

TEMPLATE 2 - Full Equality Impact Assessment (EqIA)

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: 'proposal' includes a new policy, policy review, service, function, strategy, project, procedure, restructure)	A new localised Council Tax support scheme in place of the existing national Council Tax Benefit scheme.
Which Directorate / Service has the responsibility for this?	Collections and Housing Benefits
Name and job title of lead officer	Fern Silverio, Divisional Director, Collections and Housing Benefits
Name & contact details of the other persons involved in the EqIA:	<p>Sheila Seymour-Howell, Project Member Sheila.seymour-howell@harrow.gov.uk Tel: 020 8424 1806 Ext 2806</p> <p>Bernie Beckett, Consultation Project Manager BBeckett@harrow.gov.uk Tel: 020 8424 7640 Ext 7640</p> <p>A multi-agency group has been developed to oversee the development of the Equality Impact Assessment. This group has membership from the Voluntary Sector including CAB, Mind in Harrow, Harrow Mencap, Harrow Carers, Harrow Association of Disabled People (HAD), Age UK, HASVO, Harrow Equalities Centre, Landlords Association, Tenants and Residents Association, Councillors, Unions, Representatives from Harrow Council Services.</p>
Date of assessment:	EqIA was opened on the 7 th February, 2012. The document has been monitored and updated on a regular basis by a multi-agency Steering Group. The current document is at Version 22

Stage 1: Overview

1. What are the aims, objectives, and desired outcomes of your proposals?

(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)

The Welfare Reform Act received Royal Assent on 8th March 2012, abolishing the current system for Council Tax Benefit. The Local Government Finance Act received Royal Assent on the 31st October, 2012 and includes legislation to give Local Authorities the responsibility for the development of localised Schemes for providing support for Council Tax with 90% of the funding that is currently provided.

The timescales are very tight with implementation of a new scheme required in April 2013. The grant settlement is expected to be provided on the 17th December, 2012 and therefore the schemes have initially been shaped using estimated grant allocation provided by the Department of Communities and Local Government (DCLG).

Harrow Council's aim is to implement a localised Council Tax Reduction Scheme that initially covers the first two years of delivery – 2013/14 and 2014/15 in Harrow within budget and on time, whilst mitigating any future financial risk. Within Harrow and thereafter in this Equality Impact Assessment this scheme is to be known as a Council Tax Support Scheme.

- § Within the Act Council Tax Support claimants who are pensioners will be protected by draft prescribed requirements regulations. Local Authorities must develop approaches to meet their local needs but should consider the impact on the most vulnerable when designing their schemes

A multi- agency Steering Group has been developed to work with the council to ensure the scheme is developed to reflect the needs of the local community.

Following a steer from the Leadership Group and CSB, and subsequent confirmation from the Portfolio Holder, it was agreed that savings cannot be found from elsewhere within the Council. A new scheme will therefore be developed that manages the funding gap of approximately £3.8m in the year 2013-2014 and approximately £5.1m in the year 2014-2015. These savings figures have increased since consultation following receipt of expected grant figures for Council Tax Support from Department of Communities and Local Government.

	<p>The consultation was based on the following principles:</p> <ul style="list-style-type: none"> ○ The scheme design will be developed within the statutory framework ○ The scheme will be developed to meet the resources made available from the Government ○ The scheme will provide support to the most vulnerable groups in Harrow within the funding available ○ The scheme will encourage people into work and will not provide any disincentives to work <p>The consultation materials gave examples of the main rules within Council Tax Benefit that could be changed to meet these principles. The consultation booklet and survey are an appendix to the Cabinet Report.</p> <p>As a result of the consultation three model schemes are being put to Cabinet for consideration and their details are included within the Cabinet Report. Council Tax Support Schemes 1 and 2 have been shaped through feedback from the consultation activity and both sit within the resources available to deliver Council Tax Support. Scheme 3 has been developed following the announcement from the DCLG that a transitional fund is available providing Local Authorities implement a scheme to meet with the Governments criteria and would require an overspend if implemented.</p>
<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<ul style="list-style-type: none"> - Not being able to meet the timescales that have been proposed by the Government - New Scheme not adopted by 31 January 2013 as required by the Government. - IT not in place by 31st January, 2013 - Lack of funding and resources to support implementation. - The Council is taking the risk that there will be an increase in claimants in the next two years. . - Risk of challenge
<p>3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The Department of Communities and Local Government have developed an EqIA on the proposals and this document highlights the following customers that may be affected by the proposal:</p> <ul style="list-style-type: none"> - Working age claimants - The existence of other vulnerable groups amongst working age claimants e.g. carers or disabled - Low income claimants

- Local Authorities

The following customers/stakeholders within Harrow were identified initially through modelling of Council Tax Benefit data and activity carried out with the Steering Group:

- Existing Council Tax Benefit claimants
- Future Council Tax Benefit claimants
- Workforce – Housing Benefit, Council Tax Teams and Access Harrow
- Other Council Services
- Voluntary Organisations supporting vulnerable people
- Precepting Authorities (GLA, Police, Fire)
- Council Tax payers
- Residents (if funding has to be found elsewhere could affect other services)
- Families with children
- Lone parents
- Carers
- Part time and full time workers and are claiming Council Tax Benefits
- People who are disabled and are claiming Council Tax Benefits
- Single people and couples without children
- People with mental health issues
- People who are on a low income and do not have a good education and therefore unable to earn more
- young people leaving care
- low paid workers

4. Is the responsibility shared with another department, authority or organisation? If so:

- Who are the partners?
- Who has the overall responsibility?

Harrow Council’s Housing and Council Tax Benefits Department has the overall responsibility for developing and delivering the scheme

Council Tax Department

Harrow’s partners are the precepting authorities – police, fire, Greater London Authority (GLA)

4a. How are/will they be involved in this assessment?

The Local Government Finance Bill states that precepting authorities must be consulted before the draft scheme is published and therefore meetings were held with representatives to agree how this consultation was taken forward. In line with Government advice the formal consultation was carried out with the GLA before the public consultation started on the 11th June, 2012. The GLA provided their formal response to the consultation which has been included as an appendix to the Cabinet Report.

Representatives from the GLA and Harrow Council are included in the pan London Council Tax Reduction Working Group hosted by London Councils. This group is working together to understand the proposals and how they can be implemented across London.

The precepting authorities including GLA, Police and Fire Services are members of Harrow's Consultation Steering Group that has been developed to oversee the consultation ensuring it is open, transparent and feedback shapes the new scheme. The representatives have agreed to remain on the distribution list and will attend meetings where specifically requested due to limited resources. The GLA are also part of the West London Council's Council Tax Support workshop hosted by Harrow Council and as a result meet with West London Authorities on a monthly basis.

Harrow Service Managers also attend London Council's Benefit Managers and pan London Council Tax Support meetings.

The Council Tax Section were given the opportunity to give their view through the consultation process and the Divisional Director of Benefits and Collections is a member of the Steering Group.

The Multi Agency Sub Group, with membership from the Steering Group, has met monthly to update the Equality Impact Assessments for the changes to Council Tax Benefits.

Stage 2: Monitoring / Collecting Evidence / Data

(The data quoted in this section was derived from analysis of Council Tax Benefit caseload as at 1/9/12)

5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references)

was reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc

(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

Age (including carers of young/older people)	<p>63% of the current Council Tax Benefit caseload are working age (all data is to be audited before final report and will be included as an end note to ensure clarity)</p> <p>Analysis of current Council Tax Benefit caseload for working age customers shows 3.89% are aged 18-24, 19.69% between 25-34, 34.76% between 35-44, 29.62% between 45-54 and 12.04% are 55-60.</p> <p>67% of the caseload are families with children (of the 67%, 68% are from smaller families and 32% are larger families (3+ children))</p>
Disability (including carers of disabled people)	<p>Analysis of current Council Tax Benefit caseload for working age customers shows that 15.4% are disabled (as per definition of Group A) and 1.6% are carers (shown as receiving Carers Allowance within current caseload)</p>
Gender Reassignment	<p>This information is not currently collected within the current IT system. Efforts were made to capture this information through the consultation activity however completion of the monitoring elements of the form was not consistent and therefore the information could not be relied upon.</p>
Marriage / Civil Partnership	<p>Data is provided for 'couples, analysis of current Council Tax Benefit caseload for working age customers shows that 37.79% are couples. Efforts were made to capture further information specifically regarding marriage/civil partnerships through the consultation activity however completion of the monitoring elements of the form was not consistent and therefore the information could not be relied upon.</p>
Pregnancy and Maternity	<p>This information is not currently collected as the IT system and claim forms need updating. Efforts were made to capture this information through the consultation activity however completion of the monitoring</p>

	elements of the form was not consistent and therefore the information could not be relied upon.
Race	This information is not currently collected as the data is incomplete. Efforts were made to capture this information through the consultation activity however completion of the monitoring elements of the form was not consistent and therefore the information could not be relied upon.
Religion and Belief	This information is not currently collected as the IT system and claim forms need to be updated. Efforts were made to capture this information through the consultation activity however completion of the monitoring elements of the form was not consistent and therefore the information could not be relied upon.
Sex / Gender	Analysis of current Council Tax Benefit caseload for working age customers shows that, of the person making the claim, 42% are male and 58% are female. Where there is a couple claiming the sex of the claimant has been used in these statistics. 34% of people claiming Council Tax Benefit are lone parents, of these 96% are female.
Sexual Orientation	This information is not currently collected as the IT system and claim forms need to be updated. Efforts were made to capture this information through the consultation activity however completion of the monitoring elements of the form was not consistent and therefore the information could not be relied upon.
<p>6. If you have insufficient data on any of the protected characteristics, is there any other (local, regional, national research, reports, media) data sources that can inform this assessment?</p> <p>Include this data (facts, figures, evidence, key findings) in this section.</p>	<p>The following EqlAs have been developed on a national basis:</p> <p>Department of Communities and Local Government (DCLG) – Local Finance Bill (updated version released June 2012): Localising Council Tax - identifies the impacts of the proposals on a national basis. This EqlA does identify the net impact the overall policy may have on the following groups:</p> <ul style="list-style-type: none"> - Working age council tax benefit claimants - Council tax payers - Any recipients of local services that may be reduced in order to meet any funding shortfall. <p>Race Equality Foundation – Housing benefit and welfare reform: impact of all</p>

the proposed changes for Welfare Reform on black and minority ethnic communities. This EqlA identifies the proposals for Housing benefit and welfare reform will impact Black and Ethnic Minority groups as they are disproportionately represented in low-income working and non-working households. .

Department of Work and Pensions (DWP) – Impact assessment for the Household Benefit Cap – identifies the impacts on the proposal to restrict the total amount of welfare a household can receive to meet with the average take-home pay of working households. Whilst Council Tax Benefit is excluded from these proposals, the impacts of these proposals will identify with those that will be impacted by the Localisation of Council Tax Support. This EqlA identifies the net impact of the overall policy on the following groups:

- Families who are both out of work and are either
 - Larger than average, in the most part with three or more children and are therefore receiving larger than average Child Tax Credit payments and Child Benefit payments; or
 - Situated in high rent areas and thereby receiving large Housing Benefit payments; or
 - Both of these factors combined.
- Harrow is identified as having approximately 700 households that will be affected by this policy in the year 2013/14.
 - The Steering Group are working to integrate the Health Impact Assessment (Appendix 2) and the Equality Impact Assessment and a draft template has been produced that is at Appendix 1. This activity is in progress and further work will be required to identify relevant data to help inform both Impact Assessments.

		The consultation included both quantitative and qualitative activity to bridge gaps.		
		Yes	To be carried out	No
<p>NOTE: If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are unable to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be completed before progressing with the rest of the EqIA. Guidance on consultation/community involvement toolkit can be accessed via the link below http://harrowhub/info/200195/consultation/169/community_involvement_toolkit</p>				
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	What action are you going to take as a result of the consultation? This may include revising your proposals, steps to mitigate any adverse impact. <i>(Also Include these in the Improvement Action Plan at Stage 5)</i>	
<p>The Steering Group (multi agency partnership) brought together a calendar of activity which ensured all key stakeholders were given the opportunity to give their view and shape the new Council Tax Support scheme. Regular reviews were carried out throughout the consultation process to ensure gaps in the consultation were bridged by further activity.</p>	<p>The consultation included the following activity:</p> <ul style="list-style-type: none"> • Telephone survey with 1010 residents including 310 Council Tax Benefit claimants • Written survey with members of Harrow Council's Residents Panel – 1130 were distributed and 616 (55%) completed surveys returned. • Consultation booklet and survey circulated widely 	<p>The proposals for the development of the Council Tax Support Scheme in Harrow have been shaped as a result of the feedback collected throughout the consultation. The detailed feedback reports are attached as appendices to the Cabinet Report.</p> <p>The adverse impacts have been summarised below:</p> <p><u>Feedback from the telephone survey</u> – focussed solely on vulnerability asking residents for their views on which and to what extent different groups in the population might be affected by the changes. The results of this survey were weighted in line with the population statistics for Harrow.</p> <p>Respondents were asked to identify the groups they felt would be most</p>		

<p>All residents within Harrow have been made aware of the consultation and various levels of activity have taken place to ensure all groups identified in Section 3 have been given the opportunity to give their view.</p>	<p>across Harrow with the opportunity to respond by telephone, email and freepost. The consultation booklet was also provided in easy read – 346 surveys were returned</p> <ul style="list-style-type: none"> • Specific web pages that gave the opportunity to complete the survey on line – 152 were completed on line • Facebook and Twitter • 71 Road shows, ‘Go to’ days, Events, workshops, face to face meetings which included specific events/ workshops/ Meetings and discussion groups. Over 4000 people were spoken to. • Letters sent out over an 8 week period inviting residents to these events <p>All engagement mechanisms used (bar the telephone survey that focussed only on identifying and impacts on vulnerable groups) asked the same questions to ensure consistency.</p> <p>The feedback has been collated, written up and analysed and a meeting of the Steering Group has been held to discuss the feedback and draft schemes that</p>	<p>impacted by the changes – these responses are listed under ‘Unprompted’. Respondents were also provided with a list of groups of people that have been identified as being affected by the changes through the data modelling and their responses are listed under ‘prompted’.</p> <p>The groups identified through both of these questions in order of impact are:</p> <table border="0"> <tr> <td data-bbox="1075 367 1523 638"> <p>Unprompted Household including Somebody who is registered Disabled People on a low income Unemployed Lone parents</p> </td> <td data-bbox="1523 367 2163 638"> <p>Prompted People who are registered disabled Lone parents Carers Families with children Part time workers</p> </td> </tr> </table> <p>There was a recognition that all Council Tax Benefit claimants would be impacted by the changes as they are likely to have to pay more towards their Council Tax.</p> <p>People were generally consistent in their responses regardless of the demographic group of the respondent.</p> <p><u>Feedback from the Residents Panel survey</u> - A written postal survey was carried out with members of Harrow’s Residents Panel. The survey was consistent with the questionnaire used on the web and in hard copy within the Consultation Booklet and therefore asked questions both on the groups that may be impacted by the change and specific questions relating to the different ways the rules could be changed to make the required savings.</p> <p>The Residents Panel was recruited to be as representative of the boroughs population as possible however the respondents, in the main, were white British (65.1%), male (54.7%) and over 55 (approx. 70%). Only</p>	<p>Unprompted Household including Somebody who is registered Disabled People on a low income Unemployed Lone parents</p>	<p>Prompted People who are registered disabled Lone parents Carers Families with children Part time workers</p>
<p>Unprompted Household including Somebody who is registered Disabled People on a low income Unemployed Lone parents</p>	<p>Prompted People who are registered disabled Lone parents Carers Families with children Part time workers</p>			

	<p>have been shaped following the outcomes of the consultation.</p>	<p>6.1% of the Residents Panel have reported that they receive Council Tax Benefit.</p> <p>When asked about the impact of the changes on groups the following were mentioned:</p> <table border="0"> <tr> <td data-bbox="1075 287 1523 526"> <p>Unprompted Disabled people Single parents Carers Elderly people Low paid workers</p> </td> <td data-bbox="1523 287 2172 590"> <p>Prompted People who are disabled Carers Lone parents Families with children Single people and couples without Children Part time and full time workers</p> </td> </tr> </table> <p><u>Feedback from the survey (web and hard copy)</u> - The survey was included both within the Consultation Booklet and also available on the Consultation website for completion online. People were given the opportunity to respond either by freepost, telephone or the consultation email address. The questions were consistent with those included in the Residents Survey</p> <p>When asked about the impact of the changes on groups the following were mentioned:</p> <table border="0"> <tr> <td data-bbox="1075 989 1523 1228"> <p>Unprompted People with a disability Lone parents People on a low income Pensioners Carers</p> </td> <td data-bbox="1523 989 2172 1292"> <p>Prompted People with a disability Lone parents Families with children Carers Part time/full time workers Children Single/couples without children</p> </td> </tr> </table>	<p>Unprompted Disabled people Single parents Carers Elderly people Low paid workers</p>	<p>Prompted People who are disabled Carers Lone parents Families with children Single people and couples without Children Part time and full time workers</p>	<p>Unprompted People with a disability Lone parents People on a low income Pensioners Carers</p>	<p>Prompted People with a disability Lone parents Families with children Carers Part time/full time workers Children Single/couples without children</p>
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Feedback from the face to face activity

The face to face activity gave the opportunity to discuss the changes in detail to understand the impacts of the changes.

Many groups agreed that there would be groups in the community who would be affected more than other groups. The majority highlighted people with disabilities as being a group that will be impacted by many changes. Other impacted groups included lone parents, carers, large families and people with mental health issues.

Formal response from Harrow Association of Disabled People (HAD)

HAD raised concern that disabled people will be disproportionately affected by having to pay more council tax because of the cumulative effects of the Welfare Reforms. The full response is available as an appendix to the Cabinet Report.

Formal response from Harrow Mencap Harrow Mencap's response was collated from a focus group as well as the Charity's experience of working with families, carers and users of their services. Their key concerns related to the adverse impact that people with disabilities experience because of the cumulative effects of the Welfare Reforms particularly as they felt that people with disabilities are more likely to live in poverty. The full response is available as an appendix to the Cabinet Report.

Formal response from the Greater London Authority – a formal response has been received from the Greater London Authority. This contains no feedback in relation to equalities however the full document is attached to the Cabinet Report.

(The data quoted in this section (unless otherwise stated) was derived from analysis of Council Tax Benefit caseload as at 1/9/12)

8. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc. (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)			<p>The Government have protected Council Tax Benefit claimants who are pensioners from the changes to Council Tax Benefit and therefore these proposals will impact all working age claimants. There are currently 10,882 working age claimants and all will be on a low income as Council Tax is a means tested benefit and uses the Governments needs allowance which is dependent upon family circumstances.</p> <p>Through all three proposed schemes working age Council Tax Support claimants will be required to pay more or something towards their Council Tax in the future.</p>	<p>All of the three schemes continue to not take Child Benefit and Child Maintenance into account as income when assessing for Council Tax Support to mitigate the impact of the changes upon families with children.</p> <p>Awareness Campaign - includes activity to reach all Council Tax Benefit claimants especially targeting the group of people who receive 100% Council Tax Benefit. This will include the following:</p> <ul style="list-style-type: none"> - Guidance booklet for Voluntary Organisations and staff - Training sessions for relevant departments. Staff and Voluntary Organisations - Initial letter with booklet that will be sent to all Council Tax claimants detailing the support that is available - Information sessions for claimants at Access Harrow - Articles/inserts in local press, Harrow People, Homing In and all other appropriate newsletters etc. - Help pages being developed by Communications on the Web - Information in Council Tax Bills
			<p>It was recognised by the majority of people that responded to the consultation that these changes would impact 'low income' working age families with children. All families that receive Council Tax Benefit are on a low income and therefore all Council Tax Benefit claimants have been highlighted across the board.</p> <p>Currently 64% of Council Tax Benefit working age</p>	

			<p>claimants receive 100% Council Tax Benefits, all of whom will have to pay something towards their Council Tax under all the proposed schemes.</p> <p>The level of contribution could be seen as low however in relation to this group's overall income the increase could be a substantial percentage.</p>	<ul style="list-style-type: none"> - Envelope highlighting changes to ensure opened - Posters on inside of bus routes in Harrow - Messages sent out via social media <p>Hardship fund to be developed with criteria to support the most vulnerable.</p>
			<p>67% of Council Tax Benefit claimants are working age families with children of which:</p> <ul style="list-style-type: none"> - 68% are smaller families (2 children and under) - 32% are larger families (3+ children) <p>Within this protected characteristic the consultation has identified that the changes to Council Tax Benefit could have a particularly high impact on working age large families including lone parents because large families are more likely to live in larger properties which fall into higher Council Tax banding and to be cumulatively impacted by the overall Welfare Reforms. More information is given under cumulative impacts.</p> <p>Children's Services have also identified that young children could be disproportionately affected by these changes because poverty levels would increase in those families with children. Where there is a risk of unemployment evidence shows families are at higher risk of turning to substance/alcohol misuse.</p>	<p>Collection policy to be reviewed to mitigate the risk of non collection</p> <p>The new operating model within Children & Families Services will deliver improved co-ordination of services, earlier identification of problems and swift effective early help.</p> <p>Housing delivering 1:1 support with families who are hardest hit by the benefit caps.</p> <p>Work programmes specifically targeted at Council Tax Support claimants</p> <p>Working alongside the mitigations workstream within the Welfare Reform Project Group. The proposed mitigations include the following:</p> <ul style="list-style-type: none"> - Debt and financial advice including benefit check - Development of a foodbank in Harrow - Co-ordination of second hand school uniform schemes - Recycled and reuse of furniture

			<p>Children's Services have also identified that care leavers who could be moving from supported living arrangements into their own accommodation could be adversely affected by having to pay more towards their Council Tax. There are approximately 30 care leavers annually that accessed Council Tax Benefits through their move into independent accommodation.</p>	
<p>Disability (including carers of disabled people)</p>			<p>15.42% of people currently claiming Council Tax Benefit are shown as having a known disability (this will not include some disabled people on passported benefits as this information has not been required when completing an assessment for Council Tax Benefit however will be input within the new Support Scheme).</p> <p>All the surveys received a response rate of at least 15% from people with disabilities however both the web and telephone surveys received response rates of over 25%.</p> <p>The face to face activity included events/discussion groups with users of Harrow Advisory Disability Services, Harrow Mencap, MIND in Harrow and Bentley Day Centre. Discussion groups were also held with the Deaf Drop in sessions and all Neighbourhood Resource Centres where people with disabilities also participated in much of the face to face activity held.</p> <p>There was a strong feeling within some of the activity that the Government should not be targeting vulnerable people and should be making</p>	<p>Within Council Tax regulations there are already protections in the form of discounts and exemptions. These include:</p> <ul style="list-style-type: none"> § People who have a severe mental health disability that appears to be permanent. This includes people with Alzheimer's disease, strokes and other similar illnesses. IF all the residents in the household fall into this category the property could be exempt from Council Tax otherwise some charge will still be levied. § People with disabilities whose homes have been adapted for their use may be entitled to a disabled band reduction. This means that their Council Tax will be calculated as if their property is one band lower than it would normally be. <p>Model Scheme 1 helps to reduce the effects of the changes by giving additional support to people with disabilities by having a higher level cap on the Council Tax liability (90% instead of 81.5% for all others). Criteria for the protected group is included within the Cabinet Report.</p> <p>All three schemes will mitigate the impact of the changes on people with disabilities by:</p>

			<p>the savings elsewhere.</p> <p>Within the consultation the majority of respondents highlighted people with disabilities as the group they felt would be impacted the most because of the cumulative impacts of the welfare reforms and because they felt that people with a disability are more likely to find it more difficult to access employment due to their illness/employer prejudice/accessibility to work programmes.</p> <p>Both Harrow Mencap and Harrow Association of Disabled People provided feedback relating to the disproportionate effect these changes would have on people with disabilities because of other changes which include changes to work related benefits, having to contribute to all care costs, loss of concessionary travel especially if DLA was taken into account as income. They also raised concern regarding the potential loss of DLA through the new PIP Scheme which would then have an impact on the amount of Council Tax Support if the household no longer fell into the protected category. Both organisations state that people with disabilities are less likely to be able to equally access good education and employment.</p>	<ul style="list-style-type: none"> - continuing to not take Disability Living Allowance into account when assessing income for Council Tax Support <p>continuing to take no non dependant deductions where the claimant or partner is receiving care component of Disability Living Allowance</p> <p>Awareness Campaign - includes activity to reach all Council Tax Benefit claimants especially targeting the group of people who receive 100% Council Tax Benefit. This will include the following:</p> <ul style="list-style-type: none"> - Guidance booklet for Voluntary Organisations and staff - Training sessions for relevant departments. Staff and Voluntary Organisations - Initial letter with booklet that will be sent to all Council Tax claimants detailing the support that is available - Information sessions for claimants at Access Harrow - Articles/inserts in local press, Harrow People, Homing In and all other appropriate newsletters etc. - Help pages being developed by Communications on the Web - Information in Council Tax Bills - Envelope highlighting changes to ensure opened
			<p>Approximately 1.6% of Council Tax Benefit Claimants are carers (shown as receiving Carers Allowance within current caseload)</p> <p>Through all the survey activity at least 4% of people that responded stated they were a carer however through the hard copy survey we received 25% who stated they were carers.</p>	

			<p>The face to face activity was held through events, meetings and discussion groups with carers at all the Neighbourhood Resource Centres, Harrow Mencap event, Carers Revival Meetings and the CNWL Carers event.</p> <p>Throughout the majority of the consultation activity feedback suggested that carers were identified as one of the groups who would be highly impacted because of the proposed changes. People felt they would be impacted because they had limited household income and limited employment options because of their caring duties. People also felt that carers already have extra outgoings as a result of their caring duties. There was a strong feeling, particularly in the face to face activity, that carers save the Government and Local Authorities money because they are providing the care for those in need however receive little or no help to carry out this responsibility.</p>	<ul style="list-style-type: none"> - Posters on inside of bus routes in Harrow - Messages sent out via social media <p>Hardship fund to be developed with criteria to support the most vulnerable.</p> <p>Collection policy to be reviewed.</p> <p>Work programmes specifically targeted at Council Tax Support claimants</p> <p>Working alongside the mitigations workstream within the Welfare Reform Project Group. The proposed mitigations include the following:</p> <ul style="list-style-type: none"> - Debt and financial advice including benefit check - Development of a foodbank in Harrow - Co-ordination of second hand school uniform schemes - Recycled and reuse of furniture
			Households claiming Council Tax benefit who have non dependants who are disabled or are carers could be liable for a decrease in their Council Tax Benefit due to the proposed changes to the non-dependant deductions. This would have an effect on the non- dependants, who would be expected to contribute more towards the household's Council Tax bill.	
Gender Reassignment			No information to suggest specific adverse or positive impact	Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics.
Marriage and			No information to suggest specific adverse or	

Civil Partnership			positive impact	
Pregnancy and Maternity			No information to suggest specific adverse or positive impact	Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics.
Race			<p>Monitoring information is not currently collected on this specific characteristic in relation to claimants of Council Tax Benefits however the monitoring information was included on the telephone survey/residents panel/web and hard copy surveys. Many people did not complete this element of the information however the numbers of those that completed this information are as follows:</p> <p>Telephone Survey</p> <ul style="list-style-type: none"> - Asian or Asian British – 34% - Black or Black British – 8% - Mixed background – 3% - White or White British – 51% - Other background – 2% - Refused – 3% <p>Residents Panel</p> <ul style="list-style-type: none"> - Asian or Asian British – 19% - Black or Black British – 3.2% - Mixed background – 2% - White or White British – 68.5% - Other background – 1.5% - Refused to say – 6% <p>Hard copy survey</p> <ul style="list-style-type: none"> - Asian or Asian British – 35% - Black or Black British – 13% - Mixed background – 3% 	<p>Awareness Campaign - includes activity to reach all Council Tax Benefit claimants especially targeting the group of people who receive 100% Council Tax Benefit. This will include the following:</p> <ul style="list-style-type: none"> - Guidance booklet for Voluntary Organisations and staff - Training sessions for relevant departments. Staff and Voluntary Organisations - Initial letter with booklet that will be sent to all Council Tax claimants detailing the support that is available - Information sessions for claimants at Access Harrow - Articles/inserts in local press, Harrow People, Homing In and all other appropriate newsletters etc. - Help pages being developed by Communications on the Web - Information in Council Tax Bills - Envelope highlighting changes to ensure opened - Posters on inside of bus routes in Harrow - Messages sent out via social media <p>We will work with the Voluntary Sector to ensure all materials are accessible to those whom English is a second language.</p>

- White or White British – 33%
- Other background – 3%
- Refused to say – 0%

Web

- Asian or Asian British – 28%
- Black or Black British – 5%
- Mixed background – 3%
- White or White British – 65%
- Other background – 5%
- Refused to say – 0%

Overall the responses to the surveys reflect the diverse population within Harrow which is approximately 46.6% White British and 53.4% Black, Asian and other minority ethnic groups.

Face to face activity with specific communities included events/meetings/discussion groups held with Harrow Elders, Hayaan project (Somalian Elders), Afro Caribbean Association, Afghan events, Harrow Women’s Centre, Tamil Association drop in, Afghan Payaan AGM, Harrow Women’s Association (meeting of Asian women)

There has also been concern raised that many large families of low income may be of ethnic origin and therefore may be adversely affected by the changes because of the cumulative impact of all the welfare reform changes. We do not have the monitoring information to be able to substantiate this however families with children have been highlighted both in the ‘Age’ protected

Hardship fund to be developed with criteria to support the most vulnerable.

Collection policy to be reviewed.

Work programmes specifically targeted at Council Tax Support claimants

Working alongside the mitigations workstream

within the Welfare Reform Project Group. The proposed mitigations include the following:

- Debt and financial advice including benefit check
- Development of a foodbank in Harrow
- Co-ordination of second hand school uniform schemes
- Recycled and reuse of furniture

			<p>characteristic and cumulative impacts and therefore have been considered within both proposed schemes.</p> <p>Some claimants may be impacted through language barriers and therefore Awareness Campaign needs to consider this.</p>	
Religion or Belief			No information to suggest specific adverse or positive impact	Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics.
Sex			<p>There are 42% male and 58% female Council Tax Benefit claimants. Where there is a couple claiming the sex of the claimant has been used in these statistics.</p> <p>Within the consultation the following information has been captured:</p> <p>Overall there were more responses from women than men, the only exception being the Residents Panel survey where 55% of the responses were from men.</p> <p>34% of people claiming Council Tax Benefit are lone parents.</p> <p>96% of lone parents that are currently claiming Council Tax Benefit are women and therefore there is an impact for this protected characteristic. All surveys highlighted lone parents as one of the adversely impacted groups and the reasons given were because lone parents may have limited ability to be able to access work and do not have other means of accessing money to pay their</p>	<p>All of the three schemes continue to not take Child Benefit and Child Maintenance into account as income when assessing for Council Tax Support to mitigate the impact of the changes upon lone parents.</p> <p>Awareness Campaign - includes activity to reach all Council Tax Benefit claimants especially targeting the group of people who receive 100% Council Tax Benefit. This will include the following:</p> <ul style="list-style-type: none"> - Guidance booklet for Voluntary Organisations and staff - Training sessions for relevant departments. Staff and Voluntary Organisations - Initial letter with booklet that will be sent to all Council Tax claimants detailing the support that is available - Information sessions for claimants at Access Harrow - Articles/inserts in local press, Harrow People, Homing In and all other appropriate

			<p>Council Tax.</p>	<p>newsletters etc.</p> <ul style="list-style-type: none"> - Help pages being developed by Communications on the Web - Information in Council Tax Bills - Envelope highlighting changes to ensure opened - Posters on inside of bus routes in Harrow - Messages sent out via social media - Online benefits calculator <p>All materials will be made available in other languages as required</p> <p>Hardship fund to be developed with criteria to support the most vulnerable.</p> <p>Collection policy to be reviewed.</p> <p>Work programmes specifically targeted at Council Tax Support claimants</p> <p>Working alongside the mitigations workstream within the Welfare Reform Project Group. The proposed mitigations include the following:</p> <ul style="list-style-type: none"> - Debt and financial advice including benefit check - Development of a foodbank in Harrow - Co-ordination of second hand school uniform schemes - Recycled and reuse of furniture <p>The council will work with the voluntary sector to ensure that the awareness campaign is inclusive</p>
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				<p>Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics.</p> <p>Housing delivering 1:1 support with families who are hardest hit by the benefit caps.</p> <p>The new operating model within Children & Families Services will deliver improved co-ordination of services, earlier identification of problems and swift effective early help.</p>
Sexual Orientation			No information to suggest specific adverse or positive impact	Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics.
<p>(The data quoted in this section was derived from analysis by the Corporate Performance Team using a snapshot of data from the Council Tax Benefit and Housing Benefit caseload data at June 2012)</p> <p>9. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.</p> <p>Example: <i>A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people’s participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled</i></p>			<p>The Government’s analysis does not show the effects of other changes to parts of the local government finance or welfare system.</p> <p>There is likely to be a cumulative impact as the Welfare Reform Act 2012 proposes to make major changes to the Benefits system. This project is a workstream of the Welfare Reform Project Board where Harrow Council services and partners are working together to identify the impacts of all the proposed changes. These will be identified and any mitigating factors recorded and included within this EqIA.</p> <p>Technical Reforms for Council Tax – Changes under the Local Government Finance Act 2012 allow Councils to charge full Council Tax on second homes and to abolish Class A and C exemptions. This could result in higher costs for Landlords which may be passed on to tenants who could also be affected by the changes to Council Tax Benefits.</p> <p>Community Health and Wellbeing (Adults) – possibility of a cumulative impact as a result of the introduction of the Contributions Policy. A snapshot of Adult Social Care client data was taken on the 12th October</p>	

people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.

and this information has been used to inform the data. There has been difficulty in matching the data and therefore these figures are approximate.

Within the snapshot there are 4001 clients of Adult Social Care. Of this number there are approximately 1,266 who are in community based settings and in a household receiving Council Tax Benefit however approximately 75% of these are pensioners. The remaining 25% working age Adult Social Care clients are living in a household that is receiving Council Tax Benefit and therefore could be affected by the changes. Approximately 1.8% of Adult Social Care users who are community based, receiving CTB and making a contribution towards their care. These changes could affect access to care if care users are unable to make a contribution because of lack of money.

Over 50% of these Adult Social Care users that are impacted by the changes to Council Tax Benefits live in social housing so could be affected by multiple benefit impacts.

The Council is looking at ensuring increased Council Tax charges are taken into account when assessing for contribution towards Adult Social Care.

Duty to prevent homelessness - Impact of Council Tax Benefit changes could contribute to Harrow's homelessness duties if Council Tax Benefit Claimants are made homeless

- Because of additional financial pressure due to multiple changes
- Because of recovery of Council Tax Benefit arrears or inability to pay rent because prioritise Council Tax payment.

Groups identified as being most likely to be impacted by these changes could be:

- Large families
- Ethnic minority families; and
- Lone parents

	<p>The mitigations for the wider welfare reforms are being developed through the Welfare Reform Project Board which include representation from all Directorates. The mitigations include:</p> <ul style="list-style-type: none"> - Government funding via Discretionary Housing Payment (DHP) - New welfare provision following abolition of Social Fund - Hardship fund to be provided as a direct result of the consultation 		
<p>10. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>			
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	Are there any actions can you take to meet the PSED requirements? <i>(List these here and include them in the Improvement Action Plan at Stage 5)</i>
<p>Policy decision was taken by the Portfolio Holder to design a scheme that met the funding available from the Government for the Localisation of Council Tax Support to protect other service budgets.</p>	<p>Modelling has been carried out to ensure the schemes protect the most vulnerable whilst balancing the need to make savings to avoid cuts in other services.</p>	<p>Extent of consultation with different groups and inclusion of the Voluntary Sector within the Steering Group has ensured wide opportunity to respond and much commonality in relation to concerns about who would be most affected regardless of whether respondents came from that protected group or not.</p> <p>Discussions are being held with the Steering Group in relation to their ongoing involvement in the wider implementation of the</p>	<p>Please see Action Plan that has been developed at Stage 5 which includes all mitigations.</p>

		Welfare Reforms. As part of this ongoing role the Steering Group have advised that they want to be involved in the ongoing monitoring of Council Tax Support.	
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11. Is there any evidence or concern that your proposals may result in a protected group being disadvantaged (please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act)?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	x	x				x		x	
No			x	x	x		x		X

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)
If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 4: Decision

12. Please indicate which of the following statements best describes the outcome of your EqlA (tick one box only)

Outcome 1 – No change required: when the EqlA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqlA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 5</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance equality. In this case, the justification needs to be included in the EqlA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (explain this in 12a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups.	

(You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
12a. If your EqIA is assessed as outcome 3 , explain your justification with full reasoning to continue with your proposals.	N/A

Stage 5: Making Adjustments (Improvement Action Plan)

13. List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
Age - All working age Council Tax Benefit Claimants/families with children/lone parents/children	Develop Council Tax Support Schemes that take account of feedback from consultation and meet the principles for the scheme including to continue to not take Child Benefit into account when assessing for Council Tax Support.	<ul style="list-style-type: none"> - Minimising the impact for working age families with children Council Tax Support claimants - Providing some protection for families with children/lone parents/children - Scheme implemented within the resources available from the Government therefore avoiding additional reductions in 	31.1.13	Fern Silverio	Schemes developed and being put to December Cabinet alongside this EqIA

		other services			
	<p>An awareness campaign is to be developed to ensure all Council Tax Benefit claimants understand why the changes are taking place and what it means for the individual. This will include signposting and information on support available. All of this information will be developed to be inclusive to all Council Tax Benefit claimants.</p> <p>There will be an opportunity for people to carry out a benefit check including for CTS using an online calculator.</p> <p>The Awareness Campaign will include a feedback report.</p>	<ul style="list-style-type: none"> - Raise awareness of the changes - Feedback to residents how their views have shaped the new scheme - Manage expectations to ensure that all Council Tax Benefit claimants understand they will have to pay towards their Council Tax Bill 	1.12.12 – 30.4.13	Nicola Rae/Bernie Beckett	Communications and Awareness Campaign finalised.
	<p>Hardship Fund is being developed, this will be used to help those experiencing genuine hardship as a result of the changes to Council Tax</p>	<ul style="list-style-type: none"> - Hardship fund developed with clear criteria that supports the most vulnerable - Policy developed 	31.3.13	Jenny Townsley/Bernie Beckett	Multi agency sub group set up to take forward development of Hardship Fund as part of overall mitigations for wider

	Support pay their Council Tax bills	that aligns with other mitigations from welfare reforms			welfare reforms
	An action plan is being developed to include all mitigations developed by both the Steering Group and Welfare Reform Project Board.	- Impact minimised for groups affected by Welfare Reforms	Ongoing	Welfare Reform Project Board	Action plan currently being developed
	Ability to monitor all nine protected characteristics for equality monitoring which will require upgrade of IT system and update of claim form	- Ability to adhere to equality requirements for monitoring service delivery	31.3.13	Jenny Townsley/Susan Hopkins	Request has been put to the current IT provider for Council Tax Benefits to update their system to monitor all nine protected characteristics. User group is meeting to update claims form – date to be confirmed
Disability	Model Scheme 1 has been developed to help reduce the effects of the changes by giving additional support to people with disabilities by having a higher level cap on the Council Tax liability (90% instead of 81.5% for all others). Criteria for this group is	- Minimising the impact for people with disabilities who are Council Tax Benefit claimants - Scheme implemented within the	31.1.13	Fern Silverio	- Schemes developed and being put to December Cabinet alongside this EqIA

	<p>included within the Cabinet Report.</p> <p>All three schemes have continued to disregard DLA when assessing for Council Tax Support and do not take non dependant deductions where the claimant or partner is receiving DLA care component and the disability premiums will remain.</p>	<p>resources available from the Government therefore avoiding additional reductions in other services</p>			
	<p>People with disabilities are able to access elements within work programmes and can also volunteer for Work Choice which is run by CTEC</p>	<p>- Providing the opportunity for people to be able to access work programmes</p>	Ongoing	Mark Billington	Currently in operation
	<p>Awareness Plan/Hardship Fund/Mitigations Action Plan/Monitoring – all as above in Age</p>				-
Race	All as age				
Sex	All as age				

Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	Proposing to monitor through the following mechanisms: <ul style="list-style-type: none">- Complaints- Appeals- Applications to the Hardship Fund/Welfare Assistance Scheme- Level of arrears			
15. Do you currently monitor this function / service? Do you know who your service users the service?	Yes	x	No	
16. What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	- Collection of monitoring information relating to nine protected characteristics in relation to four areas of monitoring as above.			
17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	- Monitoring reports will be developed and put to the multi-agency Steering Group for discussion on a quarterly basis.			
18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	- the GLA have complimented the extensive consultation process used to inform the policy			

Stage 7 – Reporting outcomes

The completed EqIA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqIA's will also be published on the Council's website and made available to members of the public on request.

A summary of the impacts is provided in the table below. Officers are recommending that Scheme 1 is adopted as the Council Tax Support scheme because:

- It meets the principles of the scheme
- Maintains the existing protections in relation to disregarding DLA and Child Benefit; and
- Minimises the effect of the cap for people with disabilities

Table 4	
Protected Characteristic	Impacted group
Age	<ul style="list-style-type: none"> § All working age claimants will be required to contribute towards their Council Tax Bill § 7,001 working age claimants currently receive 100% Council Tax Benefit – all will be required to contribute towards their Council Tax Bill § Working age large families will be adversely impacted due to the cumulative impact of Welfare Reforms § Working age lone parents will be adversely impacted as they have a limited ability to be able to access work and they also could have a lack of support. § Children could be adversely impacted due to increased poverty levels § Young people leaving care who are moving into their own accommodation § Non-dependants would be expected to contribute more towards the households Council Tax bill
Disability	<ul style="list-style-type: none"> § People with disabilities due to cumulative impacts of Welfare Reforms and difficulties in accessing employment § Carers because likely to have extra outgoings and less likely to be able to access full time employment
Race	<ul style="list-style-type: none"> § Large families may be of ethnic origin and therefore may be affected by the changes
Gender	<ul style="list-style-type: none"> § Lone parents are more likely to be women and for those claiming Council Tax Benefit 96% are female lone parents.

No specific adverse effect has been identified for the following groups:

- § Pregnancy and maternity
- § Gender reassignment
- § Religion or belief
- § Sexual orientation

19. Summary of the assessment

NOTE: This section can also be used in your reports, however you must ensure the full EqlA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)

What are the key impacts – both adverse and positive?

Are there any particular groups affected more than others?

Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this?

What course of action are you advising as a result of this EqlA?

20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc	The impact assessment will be publicised on the Council website and through the Steering Group.		
Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)			
The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.			
21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Fern Silverio	Signed: (Chair of DETG)	Alex Dewsnap
Date:	21/01/2013	Date:	21/01/2013