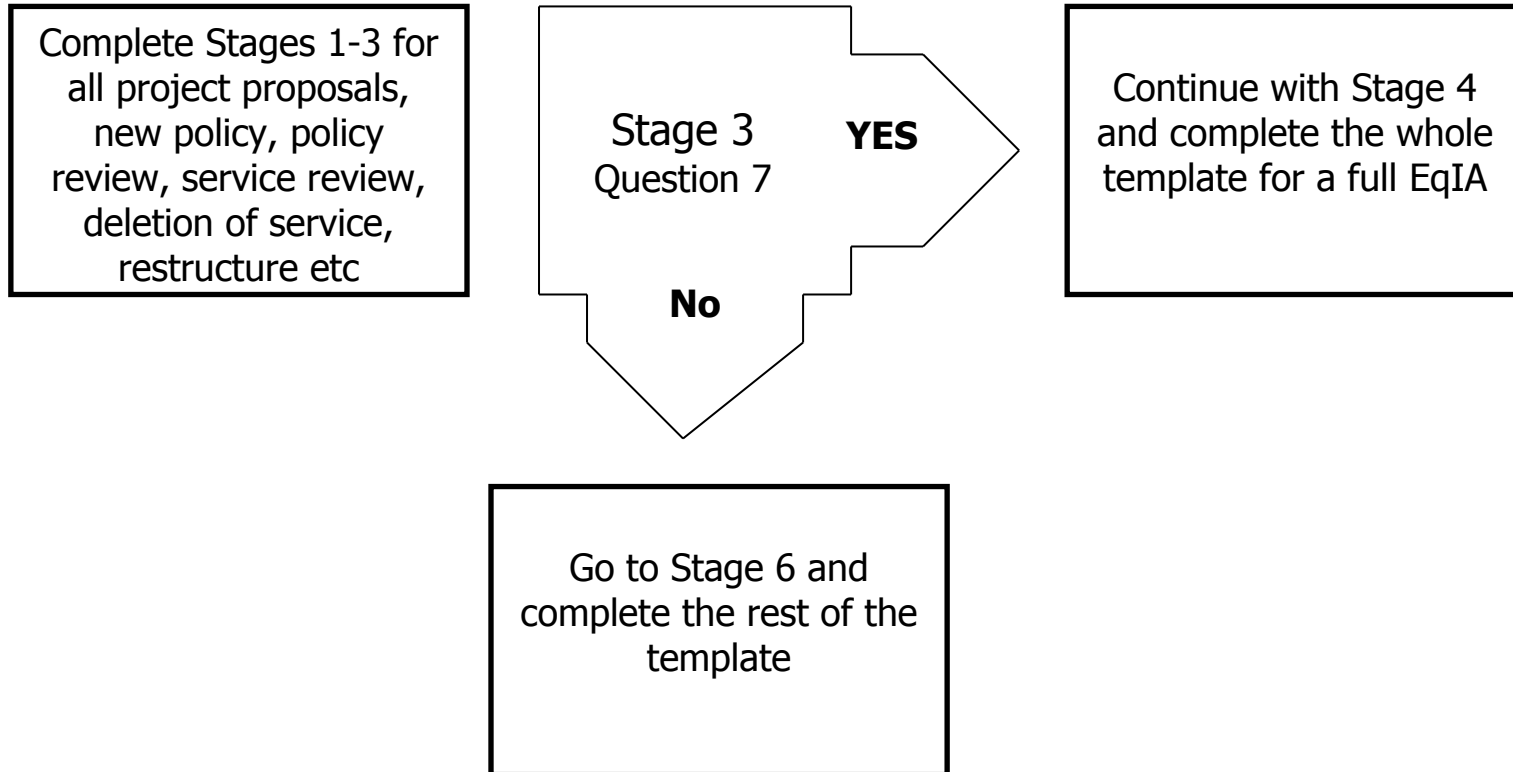


Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



Equality Impact Assessment (EqIA) Template

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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan	✓	Corporate Strategic Board	
Other		Other	
Title of Project:		Council Tax Support Review	
Directorate / Service responsible:		Resources Directorate Collections and Housing Benefits	
Name and job title of lead officer:		Fern Silverio, Head of Collections and Housing Benefits	
Name & contact details of the other persons involved in the assessment:		<p>Jenny Townsley Jennifer.townsley@harrow.gov.uk Tel: 02084241813</p> <p>Sheila Seymour Howell Sheila.seymour-howell@harrow.gov.uk Te: 02084241806</p>	
Date of assessment:		<p>Version 1 - Assessment opened 17.1.14 Version 2 - Updated 1.4.14 with additional information Version 3 - Updated 27.5.14 with revised information. Version 4 – Updated 2.7.14 with revised information Version 5 – Updated 13.8.14 with revised information Version 6 – Updated 4.9.14 with revised information Version 7 – Updated 24.9.14 with revised information Version 8– Updated 26.9.14 with revised information Version 9 – Updated 30.9.14 with revised information Version 10 Updated 30/9/14 with revised information Version 11 – Updated 6/10/14 with revised information</p>	

Version 12-Updated 07/10/14 with revised information
 Version 13 – Updated 13/10/14 with revised information
 Version 14 – Updated 28.10.14 with revised information
 version 15 - updated 06/11/14 with revised information
 version 16 - updated 07/11/14 with revised information
 version 17 – updated 12/11/14 with revised information

Stage 1: Overview

1. What are you trying to do?

(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

Review the Council Tax Support Scheme.

The Council Tax Support Scheme was implemented in April 2013 replacing Council Tax Benefits. The scheme was shaped through extensive consultation and put in place for a two year period 2013-2014 and 2014-2015 as long as key conditions remained unchanged. There is a legislative requirement to consider whether to review or replace the Council Tax Support Scheme each financial year. A decision was made at Cabinet in November 2013 to recommend to continue with the scheme for the year 2014/15 as agreed at full Council in January 2013 however to include some minor amendments to adjust the scheme to meet with inflationary upratings within the national determined scheme. These amendments fall within statutory requirements.

A multi- agency Community Reference Group is already established within the Council and will be involved in the development of any changes to the Council Tax Support Scheme to ensure the scheme is developed to reflect the needs of the local community.

Following consideration of all funding options it was agreed that proposals identifying a reduction in Harrow Council's expenditure for CTS (i.e. excluding the GLA element) of up to £2m between 2015/16 to 2016/17 should be consulted on. Proposed amendments to the scheme were therefore developed to find the potential savings. The draft scheme published in advance of the consultation is available at the following link www.harrow.gov.uk/counciltaxsupport. The current 2014/15 scheme is attached at Appendix 4 to the Cabinet Report.

Within the prescribed requirements Council Tax Support claimants who are pensioners are protected so the savings will have to be found from changes which

	<p>will only affect working age customers. The Local Authority must consider the impact of these changes on the most vulnerable when designing the scheme.</p> <p>Following feedback from the consultation, a recommendation is being put to Cabinet to retain the existing Council Tax Support scheme for 2015/16 with any pre-defined upratings that are specified in the current scheme. This Equality Impact Assessment details the potential impacts that were identified during the consultation process should the proposals have been implemented.</p>					
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p> <p>All of the people characteristics listed opposite apply</p>	Residents / Service Users	✓	Partners	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment	✓	Marriage and Civil Partnership	✓	Pregnancy and Maternity	✓
	Race	✓	Religion or Belief	✓	Sex	✓
	Sexual Orientation	✓	Other	✓		
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	<p>Harrow Council's Housing Benefit and Council Tax Support Department has the overall responsibility for developing and delivering the scheme</p> <p>Harrow's partners are the precepting authorities – police, fire, Greater London Authority (GLA). There is a requirement to formally consult with major preceptors if any changes are proposed i.e. GLA.</p> <p>A Multi Agency Sub Group, with membership from the Community Reference Group has been set up to meet during the review period to update the Equality Impact Assessments for the changes to Council Tax Support. Representatives from the Community Reference Group who have attended the sub group include Harrow Association of Disabled People, The Harrow Law Centre, MIND in Harrow,</p>					

Age UK and Capable Communities.

The Head of Service for Benefits and Collections, Portfolio Holder and Service Managers from all Directorates are members of the Community Reference Group.

The Local Government Finance Act states that precepting authorities must be consulted before the scheme is published. They have therefore been consulted throughout the process including through an invitation to attend the Community Reference Group meetings

Harrow Service Managers also attend London Council's Benefit Managers where good practice is shared across London boroughs.

Staff in Council departments that may have a vested interest in the proposals, including within the Benefits section, were given the opportunity to give their view through the consultation process.

Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)

Harrow profile

Our Harrow Our Story shows Harrow's resident population at 30th June 2012 was estimated to be 242,400 20.2 per cent of Harrow's residents are aged under 16 (48,900)⁶, 65.5 per cent (158,800) of Harrow's

population fall within the working age bracket (16 to 64) and 14.3 per cent (34,700) of Harrow's residents are 65 years of age and older.

The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities.

The number of children 0-15 is projected to increase within Harrow by 15.8% over the next ten year period. The working age population is also expected to increase over the next 10 years however at a slower rate than under 16 – 7.6%

Council Tax Support caseload

59% of the current Council Tax Support households are working age (all data is to be audited before final report and will be included as an end note to ensure clarity)

Analysis of current Council Tax Support caseload for working age customers shows 2.97% are aged 18-24, 18.4% between 25-34, 33.03% between 35-44, 30.78% between 45-54 and 14.83% are 55-61.

66% of the caseload are families with children (of the 66%, 64% are from smaller families and 36% are larger families (3+ children))

Consultation profile:

Analysis of replies to this question within the Consultation shows the following monitoring information in relation to age:

Age Group	Number
16-24	3
25-44	41
45-64	103
65 years and over	60
Did not say	23

1.3% are aged 16-24, 17.8% between 25-44, 44.8% between 45-64, and 26.1% are 65 and over. 10% of respondents to the consultation did not complete this question of the consultation form.

By comparing the CTS caseload map, child poverty and lone parent maps at appendix A1-A3 it can be seen that the highest concentration of CTS recipients are also the areas where there is the highest

percentage of lone parents and child poverty. For example Roxbourne area show as having high levels on all three maps

Harrow Profile

Our Harrow Our Story shows **Disability** -17.3% of Harrow's working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11. 13,800 (17.3%) are men and 12,900 (17.7%) are women.

Recipients of Disability Living Allowance (DLA) in May 2013 totalled 8,520 individuals, a rate of 3.5% of the total population. The rate of DLA take-up remains below the London rate which is 4.1%.

Harrow Vitality Profile shows that there are approximately 25,000 carers supporting a vulnerable person living in Harrow, just over 1 in 10 of all Harrow's residents. The number of Harrow residents providing care increased by 19.8% (4,070) over the decade

The level of carers in the borough is significantly higher than the London level and slightly higher than the national level. Harrow has the 2nd highest level of carers in London.

Council Tax Support Caseload

Analysis of current Council Tax Support 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)

Consultation Profile

The consultation question in relation to disability asked 'Are your day to day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months?'

Analysis of replies to this question within the consultation shows the following

Yes		92
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Disability (including carers of disabled people)

	Affecting mobility	50
	Affecting hearing	6
	Affecting vision	12
	A learning disability	22
	Mental ill-health	26
	Another form of disability	22
No		104
No response		34

40% of people who returned a questionnaire said that their day to day activities were limited because of a health problem or disability which has lasted or is expected to last at least 12 months. 45.2% of people who returned a questionnaire said they did not have a health problem that has lasted or is expected to last at least 12 months and 14.8% did not respond to this question.

Data was not available for carers (shown as receiving Carers Allowance within current caseload)

Gender Reassignment

Harrow Profile

This information is not available within Harrow profiling. .

Council Tax Support Caseload

This information is not currently collected for Council Tax Support as the IT system needs upgrading and there are no plans currently for the software provider to update. This data has only recently started being collected – so databases are still being developed.

Consultation Profile

Analysis of replies to this question within the consultation shows the following:

Is your gender identity the same as the gender you were assigned at birth?	Number
Yes	179
No	5
Did not say	46

77.8% of people who returned a questionnaire said their gender identity was the same as the gender they were assigned at birth. 2.2% of people who returned a questionnaire said their gender identity was different to that they were assigned at birth. 20% did not say.

Harrow Profile

Our Harrow Our Story shows since their inception there have been a total of 134 Civil Partnerships in Harrow

Harrow Vitality Profile shows the following:

Within Harrow of 53.7 per cent of residents (aged 16+) are in a marriage. There was a 25 per cent increase in the number of married people living in Harrow between 2001 and 2011.

Council Tax Support caseload

While data is not held to identify people who are married or in a civil partnership and in receipt of Council Tax Support, it is known that there are 3,389 working age claims from couples (marriage, civil partnership or living together as if married). This relates to 38.9% of working age claimants. Of these, 68% are in work.

Efforts were made to capture further information specifically regarding marriage/civil partnerships through the consultation activity however this data has only recently started being collected – so databases are still being developed.

Consultation Profile

Analysis of replies to this question within the consultation shows the following:

Q: Are you married/widowed?

Married/Widowed	Number
Yes	91
No	99
Did not say	40

39.6% of people who returned a questionnaire are married/widowed. 43% of people who returned a

Marriage / Civil Partnership

questionnaire stated they are not married/widowed. 17.4% of people did not respond to this question.

Harrow Profile

No information is collected on pregnancy and maternity within Harrow to be able to provide population data in respect to this protected characteristic.

Council Tax Support caseload

All of this information is not currently collected for Council Tax Support as the IT system needs upgrading and there are no plans currently for the software provider to update.

Consultation Profile

Analysis of replies to this question within the consultation shows the following:

Have you been pregnant and/or on maternity leave during the last 2 years?	Number
Yes	5
No	156
Did not say	69

2.2% of people who returned a questionnaire stated they had been pregnant and/or on maternity leave during the last 2 years. 67.80% of people who returned a questionnaire stated they had not been pregnant or on maternity leave over the last two years. 30% of people did not respond to this question.

Pregnancy and Maternity

Harrow Profile

Our Harrow our Story shows that Harrow is one of the most diverse places in the country. 2011 figures reveal that the White British category comprises 30.9% of Harrow's population, 69.1% of residents are therefore classified as belonging to a minority ethnic group. The most significant minority ethnic group, at 26.4% is Asian/Asian British: Indian, ranking Harrow as second in England and Wales for its Indian population. Another significant group is classified as Asian/Asian British: Other Asian, making up 11.3% of residents and ranking Harrow 1st within this classification; this group largely comprises the Sri Lankan community.

In 2011 8.2% of Harrow residents classified themselves as white other, within this group there are 3,868

Race

residents who were born in Poland and 4,784 residents born in Romania, making it the largest Romanian community within England and Wales. Harrow has a high Irish born population, ranked 7th in 2011. Whilst Black/African/Caribbean/Black British is not particularly dominant, we have the highest number of Kenyan born residents (this can be attributed to a number of migrants from Kenya who are of Asian descent).

Council Tax Support caseload

40% of working age Council Tax Support recipients completed the Race monitoring data when claiming Council Tax Support. Appendix B shows the breakdown of the caseload Race monitoring.

43% of those Council Tax Support recipients who submitted Race data are Asian or Asian British; 36% are White or White British; 15% Black or Black British; 4% Mixed background; and 2% Other ethnic background. This data indicates that of those who submitted race data there is a smaller proportion of the total White/White British population in Harrow claiming Council Tax Support, and a higher proportion of Black/Black British

24% of Council Tax Support recipients who submitted Race monitoring data are in the disabled group (15% of the total working age group fall into this category). Of the 24%, 48% are White or White British, 33% are Asian or Asian British; 14% Black or Black British; 3% Mixed background; and 2% Other ethnic background

This data indicates that of those who submitted race data a high proportion of White/White British that claim Council Tax Support are classified as disabled under the scheme, compared to Asian/Asian British who have relatively lower claim levels in this group. Changes to the Working Age Disabled liability cap and use of disability benefits as income could affect this group of people which could have disproportionate impacts on White/White British Council Tax Support recipients.

46% of Council Tax Support recipients who submitted Race monitoring data are in either full or part time work (50% of the total working age group fall into this category). Of the 46%, 55% are Asian or Asian British; 29% are White or White British, 11% Black or Black British; 3% Mixed background; and 3% Other ethnic background (totals 101% due to rounding).

This data indicates that of those who submitted race data proportionately slightly more Asian/Asian British people who receive Council Tax Support are in work, while there are less White/White British and Black/Black British in work proportionately to the working age caseload makeup. The following proposals to the Council Tax support scheme could mean that Asian/Asian British households are more likely to be

adversely impacted: including disability benefit as income, including child benefit as income, removing the additional earnings disregard, increasing the minimum council tax support award level.

66% of Council Tax Support recipients who submitted Race monitoring data have dependent children in the household (59% of the total working age group fall into this category). Of the 66%, 48% are Asian or Asian British; 32% are White or White British, 14% Black or Black British; 4% Mixed background; and 3% Other ethnic background (totals 101% due to rounding).

Of those who submitted race data proportionately more Asian/Asian British households with dependent children than in the total working age caseload, and less White/White British households have dependent children. Proposed changes to the Council Tax Support scheme could mean that Asian/Asian British households would be more likely to be adversely affected by including child benefit as income than other groups.

Consultation Profile

Analysis of replies to this question within the consultation show the following:

Ethnic Origin	Number
Asian or Asian British	65
Black or Black British	16
Mixed Background	2
Other ethnic background	5
White or White British	102
No Response	40

28% of respondents who returned a questionnaire stated they were of Asian or Asian British origin. 7% of respondents who returned a questionnaire stated they were of black or black British. 1% of respondents who returned a questionnaire stated they were of mixed background. 2% of respondents who returned a questionnaire stated they were of other ethnic origin. 44% of respondents who returned a questionnaire stated they were of white or white British origin. 18% of respondents did not answer this question.

Harrow Profile

Based on the 2011 Census, Harrow was ranked third for religious diversity, after Leicester and Redbridge. The borough was ranked 1st for persons of Hindu religion, Jainism and members of the Unification Church, 2nd for Zoroastrianism and 6th for Jewish. Out of 348 areas in England and Wales Harrow has the 2nd lowest ranking of residents with no religion and 5th lowest for Christians (37.3%). Harrow is ranked 24th for Muslim faith residents, who account for 12.5% of the population

Harrow Vitality profiles shows 37.3 % of residents are Christian, 25.3% are Hindu, 12.5% are Muslim 4.4% are Jewish and 4.8 % residents are followers of all other religions. 9.6% of Harrow's usual resident population have no religion,

Council Tax Support caseload

This information is not currently collected for Council Tax Support as the IT system needs upgrading and there are no plans currently for the software provider to update.

Consultation Profile

Analysis of replies to this question within the consultation show the following:

Religion	Number
Buddhism	3
Christianity (all denominations)	58
Hinduism	32
Islam	22
Jainism	3
Judaism	10
Sikh	0
Zoroastrian	1
No religion / Atheist	28
Other	8
No response	65

25.2% of respondents who returned a questionnaire stated their religion or belief was Christianity, 13.9% of

Religion and Belief

respondents who returned a questionnaire stated their religion or belief was Hinduism 9.6% of respondents who returned a questionnaire stated their religion or belief was Islam. 4.3% of respondents who returned a questionnaire stated their religion or belief was Judaism. 6.5% of respondents who returned a questionnaire stated they followed other religions or beliefs 12.2% of respondents who returned a questionnaire stated. They had no religion/belief, 28.3% of respondents did not answer this question.

Harrow Profile

Of Harrow's total population (242,400), 119,900 (49.5%) are male and 122,400 (50.5%) are female

Harrow's vitality profile states there are 5,560 lone-parent households in Harrow, accounting for 16,542 residents. 6.6% of Harrow's households are lone parent households.

Council Tax Support caseload

Analysis of current Council Tax Support 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. 3,274 (37.79%) of working age claims are from couples.

31% of people claiming Council Tax Support are lone parents, of these 93% are female.

Consultation Profile

Analysis of replies to this question within the consultation show the following

Male/Female	Number
Male	99
Female	93
Did not say	38

43.1% of respondents who returned a questionnaire stated their gender was male, 40.4% of respondents who returned a questionnaire stated their gender was female, 16.5% of respondents did not answer this question. Data on lone parents is not collected within the consultation

Sex / Gender

Sexual Orientation

Harrow Profile

Within our Harrow our Story it is estimated that 6% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 14,430 of our residents belonging to the LGB community

Council Tax Support caseload

This information is not currently collected for Council Tax Support as the IT system needs upgrading and there are no plans currently for the software provider to update.

Consultation Feedback

Analysis of replies to this question within the consultation show the following

Sexual Orientation	Number
Hetrosexual	134
Bisexual	10
Gay Woman/Lesbian	0
Gay Man	1
Other	11
Did not say	74

58.3% of respondents who returned a questionnaire stated they were hetrosexual 4.3% of respondents who returned a questionnaire stated they were Bisexual, 0.4% of respondents who returned a questionnaire stated they were Gay Men, 4.8% of respondents who returned a questionnaire stated they had other sexual orientation 32.2% of respondents did not answer this question.

Socio Economic

Harrow Profile

The Index of Multiple Deprivation (IMD) combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small

area in England (called Lower Super Output Areas (LSOAs)). Inequality within Harrow is highlighted by the three LSOAs in the top 20% most deprived areas in the country, an increase of one since the 2007 Indices and the 23 LSOAs in the top 20% least deprived areas in the country, the same number since 2007. The most deprived areas in Harrow appear to correlate to the areas of greatest social housing and/or local authority estates. With the exception of this factor, the areas of greatest deprivation are unrelated and are distributed throughout the borough.

Council Tax Support caseload

Council Tax Support is payable to low income households who are therefore likely to be in lower socio economic groups. From maps at appendix A4 it can be seen that CTS recipients are collected in the areas of greatest deprivation

Harrow is slightly worse than the national average for economic deprivation, as measured by the EDI 2009.

Consultation Profile

This question was not asked within the consultation

By comparing the CTS caseload map with the deprivation map at appendix A4 it can be seen that the highest concentration of CTS recipients are also the areas where there is the greater levels of deprivation. For example Roxbourne area show as having high levels on both maps

5. What consultation have you undertaken on your proposals?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected
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			groups, revising your proposals).
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<p>Precepting Authorities were formally consulted as required by statute.</p> <p>The consultation was carried out with residents and stakeholders between the dates of Monday 7th July, 2014 to Friday 12th September, 2014.</p> <p>The consultation gave all residents the opportunity to respond. All Council Tax Support recipients were communicated with.</p>	<p>A Communications and Consultation Strategy has been shaped with reference to the multi-agency Community Reference Group. Membership of the Community Reference Group includes various voluntary sector organisations such as Citizens Advice Bureau, Harrow Association for Disabled, MIND in Harrow, Age UK, Capable Communities, Harrow Mencap, Harrow Law Centre, stakeholders such as Job Centre Plus, elected members and council representatives including Children’s Service, Housing, Council Tax Support and Council Tax. The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation was delivered by using the following mechanisms to engage: Council Tax Support Changes Consultation Booklet with survey was</p>	<p>The full consultation report is attached to the Cabinet Report at Appendix A2</p> <p>Questionnaire In total there were 230 responses to the questionnaire, of which 184 were paper returns and 46 were online through the Council website.</p> <p>Through the responses received the following impacts were identified:</p> <p>Proposed Scheme 1 25% of the respondents said that Harrow Council should adopt proposed Scheme 1:</p> <p>Respondents identified the following groups would be most disadvantaged by proposed Scheme 1:</p> <ul style="list-style-type: none"> - People in receipt of disability benefits and entitled to full CTS - People in receipt of disability benefits and not entitled to full CTS - Families with 3 or more children (further detail in consultation report) <p>Proposed Scheme 2 20% of the respondents said that Harrow Council should adopt proposed Scheme 2. Respondents identified the following groups would be most disadvantaged by proposed Scheme 2:</p> <ul style="list-style-type: none"> - People in receipt of disability benefits and not entitled to full CTS 	<p>The consultation was monitored throughout to ensure users of services and affected groups were given the opportunity to give their view. The proposed Scheme which will be taken to Cabinet will be shaped using the feedback.</p> <p>Feedback was received during the consultation activity that the questionnaire did not make it clear that it was possible to say ‘no’ to all proposed schemes. As a result of these concerns this was pointed out to residents at face to face events.</p> <p>Additional events arranged where requested or need identified e.g. MIND in Harrow event 24/9/14, Flash Musicals</p>
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distributed widely to community settings such as Access Harrow, libraries, Children’s Centres, Doctors Surgeries, Voluntary Organisations, playgroups, resource centres and religious settings
 A letter advertising the consultation and enclosing the consultation booklet and survey was sent to all Council Tax Support recipients and a further 5000 random sample of Council Tax payers who were not in receipt of Council Tax Support. 31 events/meetings have been held with users of Voluntary Agencies, residents, Council Tax Support recipients and Council employees. The consultation documents were made available electronically and publicised through various mechanisms including the local press.

The consultation identified four possible schemes and gave residents the opportunity to advise whether each of the individual four schemes

- People in receipt of disability benefits and entitled to full CTS
- Families with 3 or more children (further detail in consultation report)

Proposed Scheme 3

39% of the respondents said that Harrow Council should adopt proposed Scheme 3. Respondents identified the following groups would be most disadvantaged by proposed Scheme 3:

- Families with 3 or more children
- Families with 1 or 2 children
- Full time or part time workers

(further detail in consultation report)

Proposed Scheme 4

21% of the respondents said that Harrow Council should adopt proposed Scheme 4. Respondents identified the following groups would be most disadvantaged by proposed Scheme 4 were:

- People in receipt of disability benefit and not entitled to full CTS
- Families with 3 or more children
- People in receipt of full disability benefit and entitled to full CTS

(further detail in consultation report)

People were asked if there were any other groups they believed would be detrimentally affected by any of the four proposed schemes. 14% of the 230 respondents said yes, there were other groups, of which 52% identified those on low income/no income/Job

could be adopted. Residents were also asked to identify who they thought would be impacted by the individual schemes and when they felt any changes should be put in place. The four schemes included within the consultation are attached within the Consultation document at Appendix A2 to the Cabinet Report. The consultation document includes a list of events and meetings held and all of the organisations/community groups that were given the opportunity to be involved.

Seekers Allowance/Employment Support Allowance.

More respondents were in favour of phasing the introduction of the scheme in over 2 or more years than introducing it in full from April 2015, although the difference is marginal. Actual results were:

Phasing option	Number
in full from April 2015	70
phased in over 2 or more years	85
neither	67
Both	8

General comments were made by some respondents to the questionnaire. A summary of the general comments is shown below however the full detail is included in the consultation report:

- 11% of people who responded said we should protect the vulnerable
- 7% made comments regarding the consultation process
- 6.5% said protect the disabled
- 6% raised concern regarding the lack of affordability for the individual
- 5% made comments regarding Central Government policies of Welfare Reform/benefits/level of grant

29% of respondents did not state any preferred scheme.

Event Feedback

31 face to face events were held and a summary of the topics raised is included below:

Focusing purely on the comments relating to the CTS consultation the 3 comments most commonly made were:

1. Lack of affordability for the individual – comments included:
 - I am not some lout who has not worked & claim money to spend on there "habits". It is ridiculous I can barely manage - take more from footballers, actors, MPs etc. and give to the people who need! Would you like to be a toilet attendant earning a pittance? Madness!! Because I was born in 1954 must now wait another 6 yrs until my pension!
 - I already have £2000 arrears of Council Tax that I am trying to clear. An extra payment of £25 to £30/month to be paid to the Council is virtually impossible! I have a lot of stresses at present and this extra added pressure will NOT help me at all
2. Why is it people who are at the bottom of the ladder are hit – comments included
 - How can you target the poorest and most vulnerable members of society (unemployed, single parents, disabled) etc. why don't you start by cutting the pay of the highest earners a the council (managers councillors advisors and sundries) get rid of the mayors car + office, forget black history week or white history week if you ever have one (its divisive and racist) stick to the basic - rubbish clearing - road maintenance -

street lighting etc. Cancel your glossy magazine.

- I feel yet again that people on low income or benefits are being discriminated against.
- It is appalling that the council is making any cuts what so ever to the council tax support scheme when it will be directly, negatively affecting the quality of life for our poorest and most vulnerable residents. I would much rather a disabled person or single mother had enough money to eat & heat their homes than look at the frivolous waste of tax payers' money such as the new paving in harrow town-centre - This council have their priorities all wrong!

3. Protect the Disabled – comments included –

- People with disabilities and long term health conditions should be given more care and concern than people who are able to walk and are healthy this is because disabled people can't work to afford high rates of council tax they rely solely on the benefits they receive whilst other groups are able to pay high rate because they have a steady income can afford it through work.
- Lack of council tax support will be most detriment to disabled people who are already dependent on benefit which has already been cut a lot

Childrens services

A summary of the feedback from the Children's Service Managers was as follows:

- They felt unable to choose any of the four proposals as all were too detrimental to children.
- They were concerned about the impact of reducing income to families on the number of children living in poverty in the borough
- They believed all of the proposals would have a major impact on working families
- The proposals would increase pressure on families, particularly in light of other welfare reforms and legislative changes
- Full response attached to the Consultation report as an appendix A2 to the Cabinet report

Formal Responses

Formal responses were received from the following organisations

1. Greater London Authority
2. Harrow Law Centre
3. Harrow Citizens Advice Bureau
4. Harrow Mencap
5. Zacchaeus 2000 Trust (Z2K) and Child Poverty Action Group (CPAG)

While the Greater London Authority did not raise concerns about equalities, the other four formal response included a number of commonly held views:

- Unable to support any of the four Proposed Schemes
- Proposals are seen as likely to push more people into debt and arrears
- The Harrow scheme is the harshest in the UK and goes beyond central government cuts
- Disability Benefits and Child Benefit should not be considered as income for CTS
- Schemes are seen as hitting the vulnerable and disabled, with a lack of affordability for individual claimants

Greater London Authority

A formal response has been received from GLA this contains no feedback in relation to equalities. The full response is attached to the Consultation report as appendix 2 to the Cabinet report.

The Harrow Law Centre

A summary of the responses in relation to equalities are:

- It is disappointing that this Council has chosen to freeze council tax for the wealthier residents whilst increasing council tax to its poorest residents by 30% over the past two years.
- Council Tax Support is one of the few areas in which the Council has control over the level of welfare cuts to the poor.

- Harrow Council has gone significantly beyond the cut imposed by Central Government and there is now ample evidence that its current Council Tax Support scheme means that the poor in Harrow are required to pay significantly more than anywhere else in the UK.
- The Council Tax Support cuts far exceed the detrimental impact of the benefit cap, bedroom tax, increased sanctions, higher non dependant deductions and abolition of the social fund combined. Members must be aware that these are cuts that have been imposed by the Local Authority not the Government
- Data from the National Policy Institute shows that in the first two years of the localised Council Tax Support scheme Harrow imposed the highest minimum payment of Council Tax on its poorest residents compared to any other Local Authority in the UK.
- We have raised concerns at the inadequacy of the Harrow scheme since data became available in 2013. We had hoped that at least some attempt would be made to address the fact that the poor are so penalised by the Harrow Scheme particularly from a council claiming to protect the vulnerable and tackle the housing crisis.

- We are astonished that when it has been established that Harrow provides the worst council tax reduction scheme in the UK that it would consider consulting on making it even worse.
- We do not agree with any of the suggested proposals because each of the proposals is likely to place the most vulnerable in Harrow into debt, homelessness and destitution.
- In all four categories we believe that all the suggested groups will be disadvantaged. The proposals simply extend the worst aspects of the existing scheme to people who are disabled, families with children and the working poor.
- Council tax remains the only debt for which a person can go to prison. This combined with heavy handedness by bailiffs acting for Harrow means that people have prioritised council tax over paying their rent or buying food. Consequently this local policy is leading to increased homelessness and destitution.
- The ready use of bailiffs by the Authority means that a council tax debt often triples making it completely unmanageable.
- The current levels of uncollected council tax mirror exactly the cuts to

benefits. The latest proposals will extend this level of debt and hardship to the wider community and in particular those with disabilities.

- Whilst we appreciate the desire by the Council to offer a wide consultation we are disappointed at the consultation document itself.

The full response is attached to the Consultation report as an appendix A2 to the Cabinet report.

Harrow Citizens Advice Bureau

- Do not like any of the Proposed Schemes because of how difficult people in the affected groups would find the changes
- Believe people would like the scheme to remain as it is
- Would prefer a phased approach to allow the effect of the changes to be monitored for both the claimants and for Council Tax collection
- Keep Liability Cap differential for disabled claimants
- Do not include Disability Benefits as income as this money is intended to help with the extra cost of disability
- Of the four options, three of which

include taking all of child benefit, the option to restrict Child Benefit income to families with more than 1 child is most palatable. However, concern was raised in respect to larger families who may also be affected by the benefit cap.

- Drop the Additional Earnings Disregard as it is believed this is a fairer way of distributing CTS to the lower paid
- Do not increase minimum Council Tax Support cut-off as people already struggle with a £2 minimum award and any increase would make the scheme too harsh. Every penny helps low income families.
- NDDs should start at existing level and increase for higher earners. Some clients non-dependants refuse to pay toward the Council Tax and/or refuse to disclose income.

Harrow Mencap

A summary of the feedback states that disabled people will be adversely impacted by the proposed changes as these would mean additional costs at a time when they state disabled people are experiencing severe reductions in income with rising costs of living. Particularly as the benefits they receive were designed to meet the additional costs of

living as a disabled person. Including disability benefit as income will not increase CT revenue as it will impact on the funding received by Adult Social Care. However it will increase stress, misery and the debt of disabled people impacting negatively on their health and wellbeing.

Harrow Mencap also oppose any changes to using child benefit as income as this will impact on larger families in Harrow, many of which are part of the BMER community and as such this community would be adversely disproportionately impacted by these changes as they are among the poorest and often have a higher prevalence of disability.

Zacchareus 2000

The feedback states that all the proposed schemes would disadvantage all groups as Harrow has the highest minimum payment of all London Boroughs.

A summary of their feedback states that the current scheme is already pushing deprived residents deeper into poverty, particularly for disabled residents.

Specific concerns regarding the proposed schemes are that all groups will be negatively financially impacted by the proposals and low income workers, disabled people and larger families will be affected the most. Including disability benefits as income for people with disabilities and not entitled to full Council Tax Support will increase barriers to the labour market.

Proposed changes will have a detrimental

effect on large families and lone parents who are already at high risk of living in poverty. Including child benefit as income will also have a detrimental impact on children growing up in poverty particularly in large families.

Petition

As a response to the Consultation Harrow Council has received a petition from residents regarding the proposed changes to the Council Tax Support scheme. The petition is signed by 411 people.

The petition states:

'We the undersigned are opposed to Harrow Council's decision to tax the benefit of thousands of disabled and unemployed residents. We note that Harrow's 30% 'Minimum Payment' of Council Tax is already the highest in London and that now Councillors are proposing to increase that charge, by including disability benefits and child benefit in the calculation.

We understand that this policy is driven by the Coalition Government's policy of 'localising' Council Tax Benefit and the 10% cut in funding, but note that Hammersmith & Fulham, Kensington & Chelsea, Merton, Tower Hamlets, Wandsworth and Westminster have all decided against taxing their poorest residents and so we call on councillors in Harrow to withdraw this new 'Poll Tax'.

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

The Harrow Vitality Profile has been developed using the latest census information http://www.harrow.gov.uk/info/200088/statistics_and_census_information/966/vitality_profiles

Where shown data has been taken from Our Harrow Our Story http://www.harrow.gov.uk/info/200041/equality_and_diversity/863/public_sector_equality_duty

Harrow Council Demographic Briefing Note: July 2014 ‘ 2012-based ONS Sub-National Population projections for Harrow

Local data from the Council Tax Support IT system has informed this EqIA

Joseph Rowntree Foundation How have low income families been affected by changes to Council Tax Support? Attached at Appendix C

Child Poverty Action Group/Z2K A New Poll Tax, the impact of the abolition of Council Tax Benefit in London attached at Appendix D

Stage 3: Assessing Potential Disproportionate Impact

7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

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

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

<p>8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?</p> <p>(include this evidence, including any data, statistics, titles of documents and website links here)</p>	<p>Our Harrow Our Story was used as a source of reference.</p> <p>Harrow Vitality Profiles were used as a source of reference</p> <p>Experian segmentation data</p> <p>LGiU brief on increasing demands on FoodBanks as a result of the changes in the welfare regimes.</p> <p>Joseph Rowntree has reported on the impacts of CTS on a national basis. This report is attached at Appendix C. CPAG have also reported on the impact of the abolition of Council Tax Benefit on a national basis however have highlighted Harrow as having the highest average loss per claimant across London for the 2014/15 year scheme.</p>
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9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation
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			with the affected groups, revising your proposals).
No further consultation was carried out			

Stage 5: Assessing Impact and Analysis

10. What does your evidence 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	Adverse ✓	Positive ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)	✓		<p>The Government have protected pensioners from the changes to Council Tax Support and therefore the proposals put to consultation will impact working age claimants.</p> <p>There are currently 8,708 working age claimants and all will be on a low income as Council Tax Support is means tested and uses a needs allowance for assessment purposes.</p> <p>66% of Council Tax Support claimants are working age families with children of which:</p> <ul style="list-style-type: none"> - 64% are smaller families (2 children and under) - 36% are larger families (3+ children) <p>Child benefit is awarded to pay for additional costs of having children. By including it as income in the CTS calculation, part of the child benefit award is expected to be used to pay Council Tax. This will</p>	<p>Having considered the feedback from the consultation and the potential impacts identified, a recommendation is being put to Cabinet to retain the current Council Tax Support scheme. This will alleviate the impacts identified and therefore mitigations specific to changes to CTS will not be required.</p> <p>The mitigations detailed below were brought together in response to the impacts should the proposed schemes be implemented. Some items will be implemented outside of the CTS scheme review as they are part of a broader response to welfare reform and not specific to CTS.</p> <p><u>Mitigations specific to the Age characteristic if proposed changes were implemented</u></p> <p>Pensioners will continue to receive up to 100% of</p>

		<p>potentially impact children, particularly those in larger families and there will be a likely increase in the number of children living in poverty in the borough.</p> <p>All of the proposed schemes have an impact on this protected characteristic at differing levels. The four schemes are detailed in the consultation document attached at Appendix 2 to the Cabinet Report.</p> <p>Working age working households are at risk of being disincentivised to work if they lose additional CTS. Harrow already has one of the highest tapers at 30%, and some of the proposed changes will adversely impact this group further.</p> <p>The current scheme has three groups of claimants:</p> <ul style="list-style-type: none"> - Pensioners who are not affected by the changes - Working age disabled and working age war pension recipients (see scheme for definition at Appendix 4 to Cabinet Report) - All other working age <p>Through all four proposed schemes many working age Council Tax Support claimants will be required to pay more towards their Council Tax in the future. The individual schemes have differing impacts on different groups of claimants.</p> <p>All four schemes will not additionally affect households in the working age (other) group who are in receipt of Jobseekers Allowance (Income Based), Income Support or Employment Support Allowance (Income related) who do not have non-dependents living in their household. The four schemes are detailed in the consultation document attached at Appendix 2 to the Cabinet Report.</p> <p>Within the consultation feedback it was recognised that all four proposed schemes would have an</p>	<p>the council tax under the council tax support scheme</p> <p>All of the proposals intend to retain the disregard of child maintenance and additional amount added to household allowances to account for dependent children</p> <p>All children in school years 1 & 2 will receive free school meals from September 2014 which will assist low income working families who may not have previously been entitled.</p> <p>Working age households who work will also continue to have some of their earnings disregarded within the CTS scheme under the proposals being taken to members.</p> <p>Households in the Working Age Other group who are in receipt of Job Seekers Allowance (Income Based), Income Support or Employment Support Allowance (Income Related) and do not fall in to the Disabled category will not be affected by the proposals unless they have non-dependents living in the household</p> <p><u>Generic mitigations</u></p> <p>Awareness Campaign - includes activity to reach all Council Tax Support claimants especially targeting working age. This will include the following:</p> <ul style="list-style-type: none"> - Guidance for Voluntary Organisations and staff - Training sessions for relevant departments, Staff and Voluntary Organisations - Initial letter that will be sent to all Council Tax claimants detailing the support that is available - Information sessions for claimants at Access
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impact on families with children and full and part time workers.

Childrens services expressed concern about the impact of reducing income to families on the number of children living in poverty in the borough

They believed all of the proposals would have a major impact on working families and would increase pressure on families, particularly in light of other welfare reforms and legislative changes

Formal feedback from the Harrow Law Centre expressed concern for all working age, particularly the vulnerable (although this term was not defined). It was stated that any of the four proposed CTS schemes would be likely to place the most vulnerable in Harrow into debt, homelessness and destitution and that all of the groups identified would be disadvantaged including families, lone parents, workers, single people and couples. The Law Centre believed that people would prioritise paying their Council Tax over paying rent or buying food.

Harrow Citizens Advice believed that all groups would find the proposed changes difficult. Concern was raised about the impact of using child benefit as income, particularly for larger families if they were also affected by the benefit cap. It was also felt that the CTS minimum level should not be increased because people already struggle with the £2 as 'every penny helps low income families'. They believe that a phased approach would enable the changes to be monitored for claimants.

Zacchareus 2000 believed that all of the proposed schemes would disadvantage all groups and the current scheme is already pushing deprived residents deeper into poverty. Specific concerns relate to low income workers, larger families and lone parents who it was felt would be negatively

- 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
 - Online benefits calculator

Xcite programme – Additional funds have been allocated to the Council’s employment support Xcite programme to mitigate the impacts of changes to CTS. The scheme which will target working age CTS claimants will support residents to gain vocational skills and qualifications which in turn will enable clients to progress in employment and increase their earning power, and therefore their ability to pay more towards their council tax.

Discretionary Housing Payments - In 2014/15 Harrow Council received £1.1m in Discretionary Housing Payments (DHP) and it is anticipated that a similar allocation will be received for 2015/16. DHP is available to support residents in receipt of Housing Benefit with their housing costs; mainly rent or deposits.

While legislation prevents DHP from being used to directly assist residents with Council Tax, it is directed to low income households who have been impacted by welfare reform. Receipt of these funds will increase the benefit income to households, assisting them in managing their

financially impacted by the proposals the most and at risk of living in poverty. Including child benefit as income would have a detrimental impact on children growing up in poverty.

The EqIA sub group raised the following concerns:

- Child benefit should also be used for a specific purpose. Some families save child benefit for uniforms and their children's needs so using it as income is not right.
- People under 25 years of age receive a lower level of benefit & are already struggling to pay 30% Council tax contribution and bills within the amount they receive.
- The impact on younger people is not proportioned considering their low level of income.
- Consideration is needed of 17/18 year olds with disabilities and impacts on their families. They now have to begin controlling their funds and dynamics within their families will be affected.
- Pension age increase means some people will be impacted for longer, especially with the changes under Universal Credit for those with a partner nearing pension age and the other still under pension age.

Analysis of the CTS caseload shows that 1.72% of Council Tax Support claimants are under 25 of these 19.6% were working

finances and increase their ability to pay Council Tax.

Investment in the delivery of face to face advice by the CAB - A further mitigation to the proposed CTS scheme changes, is the investment of an additional £130k to support the continuation of face-to-face advice services provided by Harrow CAB over the next 18 months.

Hardship Fund – Under the Council's Help programme £100k has been allocated to the Hardship Fund which commissions services from the voluntary sector to support residents impacted by welfare reform. 5 projects which launched on 1st October are being delivered by Carramea, Harrow Carers, Harrow Law Centre, MIND in Harrow and a consortium led by HASVO.

Harrow Advice Portal - In partnership with 13 voluntary advice agencies in Harrow, the Council has developed an on-line advice portal. The website delivers a one-stop-shop approach to advice across the borough on various subjects including

- Debts and Money
- Disability
- Emergency support
- Housing
- Social/Community Care
- Welfare Benefits

Council housing new build initiative - The Council's current housing proposals intend to deliver additional affordable housing which will be made available to those in need and in accordance with the Council's income-related eligibility criteria. The corporate regeneration proposals currently

				<p>assume 40% of new housing would be affordable rented properties.</p> <p>It is anticipated that by creating additional affordable housing in the borough, low income households will be better placed to manage their finances including the ability to pay council tax.</p> <p>Council Tax Collection and Recovery Policy</p> <p>Harrow reviewed its recovery strategy in 2013 and implemented a vulnerability policy earlier this year.</p> <p>Harrow has also improved its recovery processes and introduced checkpoints at key recovery stages to ensure more bespoke recovery action is considered before escalating key vulnerable cases to more draconian recovery actions.</p> <p>Supporting You Event</p> <p>Harrow Council is hosting the Supporting You Event in November 2014. The event brings together a broad range of organisations from across the borough to give residents access to holistic advice and support. The event is targeted at people impacted by welfare reform, but all residents are invited to attend.</p> <p>The services provided include financial management advice, benefits information and CV writing workshops. Organisations attending include:</p> <ul style="list-style-type: none"> • Age UK Harrow/Community Click • Christians against poverty • Harrow Association of Somali Voluntary Organisations • Harrow Citizens Advice • Harrow College
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				<ul style="list-style-type: none"> • Harrow Mencap • Job Centre Plus • Mind in Harrow • NatWest Business Banking • NHS Health Checks • StepChange Debt Charity • Westminster Drug Project • Harrow Council Services including Children's Services, Xcite, Housing, Housing Benefits <p>Concerns were raised by the EqIA sub-group that some of these mitigations rely on support from the voluntary sector. Under the current Take Part consultation there is potential that funding to the voluntary sector by the Council will be reduced; if the voluntary sector has reduced capacity or some organizations are no longer able to run, there is a risk to some of these mitigations.</p>
Disability (including carers of disabled people)	✓		<p>2323 of people currently claiming Council Tax Support are in receipt of disability benefits.</p> <p>Within the current scheme additional support is provided to people with disabilities who fit within agreed criteria. This was developed directly as a result of feedback to consultation when the initial Council Tax Support Scheme was developed in April 2013.</p> <p>All of the proposed schemes have an impact on this protected characteristic at differing levels. The four schemes are detailed in the consultation document attached at Appendix 2 to the Cabinet Report.</p> <p>Through the consultation feedback it was recognised that people with disabilities could be impacted by all four schemes. It was also recognized that Carers would be impacted by the</p>	<p>Having considered the feedback from the consultation and the potential impacts identified, a recommendation is being put to Cabinet to retain the current Council Tax Support scheme. This will alleviate the impacts identified and therefore mitigations specific to changes to CTS will not be required.</p> <p>The mitigations detailed below were brought together in response to the impacts should the proposed schemes be implemented. Some items will be implemented outside of the CTS scheme review as they are part of a broader response to welfare reform and not specific to CTS.</p> <p><u>Mitigations specific to Disability characteristic if proposed changes were implemented</u></p>

proposed changes within all schemes.

In addition to the comments made in formal feedback regarding detrimental impacts to all working age CTS claimants, concerns were raised about affects for disabled residents and carers.

The Harrow Law Centre has concerns that the proposals are likely to place the most vulnerable in Harrow into debt, homelessness and destitution. It is believed that the changes would extend impacts of debt and hardship under the current scheme, to the wider community and in particular those with disabilities.

Citizens Advice Bureau stated that disability benefits should not be included as income as this was made available to people to assist with the additional cost of disability.

In summary, Harrow Mencap believe that disabled people will be adversely impacted by the proposals as it would mean additional costs at a time when they believe disabled people are experiencing severe reductions in income with rising costs of living, particularly as benefits were designed to meet the additional costs of living as a disabled person. This will lead to increased stress, misery and the debt of disabled people will impact negatively on their health and wellbeing.

Zacchareus 2000 also stated that disabled groups would be negatively financially impacted by the proposals, increasing barriers to work for disabled people if their disability benefits were taken as income.

Additional allowances will continue to be added to the household allowance for households where one of the members receives specified disability benefits.

In all but one of the proposals the CTS working age disabled group will continue to receive a level of protection in the scheme compared to the 'working age other' group.

Other generic mitigations are listed under the Age characteristic above

			<p>The EqIA sub group raised the following points:</p> <ul style="list-style-type: none"> • Only people who receive certain disability benefits are classified as disabled under the CTS scheme and therefore awarded any of the protections allocated to this group within the scheme. Those people who classify themselves as disabled but do not claim the relevant disability benefits for example because they are not aware of their entitlement or because they are too unwell to claim, will not be identified under the scheme as disabled and consequently not access the correct level of assistance. • Furthermore people who currently receive the lower rate Disability Living Allowance (DLA) will potentially lose their entitlement to a disability benefit under the new Personal Independence Payments scheme (PIP). With the loss of this benefit and the associated income, they will also lose access to other benefits such as a level of protection under the CTS scheme. • DLA is supposed to be a compensatory award and as care side is eroding is often used there. To use it for Council Tax payments would be unfair. The extra costs involved with being disabled are what the payment is for. • Concern around recovery methods for Council Tax and use of DLA as income for daily expenses. • Consideration is needed of 17/18year olds with disabilities and impacts on their families. They now have to begin controlling their funds and dynamics within their families will be affected. 	
Gender Reassignment		✓	This information is not held on the Council Tax Support system however 3% of people who completed this question on the monitoring	

			<p>information within the consultation stated their gender was not the same as they were assigned at birth.</p> <p>No detrimental impacts have been identified for this group</p>	
<p>Marriage and Civil Partnership</p>			<p>Marriage and Civil Partnership is not held on the Council Tax Support system</p> <p>Council Tax Support data shows working age people classified as a couple under Council Tax Support Scheme are more likely to be in-work also that working age couples are more likely to have children this means that they are more likely to be adversely affected by the proposed changes</p> <p>Couples could be disproportionately adversely affected by the following proposals to the council tax support scheme: including disability benefits as income, including child benefit as income, removing the additional earnings disregard and increasing the minimum council tax support award level.</p> <p>48% of people who responded to the consultation stated they were married and 6% stated they were in a civil partnership and therefore as above could be disproportionately adversely affected by the proposals.</p> <p>Impacts identified by the consultation, including formal respondents, addressed under the Age characteristic, could also specifically affect people within the Marriage and Civil Partnership characteristic as CTS couples are more likely to be in work and have children.</p>	<p>Having considered the feedback from the consultation and the potential impacts identified, a recommendation is being put to Cabinet to retain the current Council Tax Support scheme. This will alleviate the impacts identified and therefore mitigations specific to changes to CTS will not be required.</p> <p>The mitigations detailed below were brought together in response to the impacts should the proposed schemes be implemented. Some items will be implemented outside of the CTS scheme review as they are part of a broader response to welfare reform and not specific to CTS.</p> <p><u>Mitigations specific to Marriage and Civil Partnership characteristic if proposed changes were implemented</u></p> <p>The couple allowance will continue to be used where the household includes couples however this remains lower than the rate that would apply to two single people. The standard earnings disregard will continue.</p> <p>Other generic mitigations are listed under the Age characteristic above</p>

Pregnancy and Maternity	✓		<p>This information is not held on the Council Tax Support system however 3% of people who completed this question on the monitoring information within the consultation stated they had been pregnant and/or on maternity leave during the last 2 years. No specific impacts for pregnant women have been identified within the consultation.</p> <p>People who have had a baby in the last two years could be detrimentally impacted by the proposed changes where Child Benefit could be treated as income. This has the same adverse impact however as any child between 0 – 18 and is therefore addressed under the Age characteristic.</p>	
Race	✓		<p>This information is collected on the Council Tax Support system however has only been supplied by 3,468 working age recipients of CTS.</p> <p>Of the respondents who returned a questionnaire 28% stated they were of Asian or Asian British origin, 7% stated they were of black or black British, 1% stated they were of mixed background. 2% stated they were of other ethnic origin and 44% stated they were of white or white British origin.</p> <p>There is concern that many large families of low income may be of ethnic origin and therefore more likely to be affected by the changes. It is not known overall what proportion of these families work and would be most severely impacted.</p> <p>The monitoring information that is available as</p>	<p>Having considered the feedback from the consultation and the potential impacts identified, a recommendation is being put to Cabinet to retain the current Council Tax Support scheme. This will alleviate the impacts identified and therefore mitigations specific to changes to CTS will not be required.</p> <p>The mitigations detailed below were brought together in response to the impacts should the proposed schemes be implemented. Some items will be implemented outside of the CTS scheme review as they are part of a broader response to welfare reform and not specific to CTS.</p> <p><u>Mitigations specific to Race characteristic if proposed changes were implemented</u></p> <p>All of the proposals intend to retain the disregard of child maintenance and higher household</p>

		<p>shown in Appendix B shows that a higher proportion of families of Asian or Asian British background are more likely to work and a higher proportion of families of White/White British background are classified as disabled under the scheme</p> <p>We do not have complete monitoring information to be able to substantiate this however families with children have been highlighted in the 'Age' protected characteristic. Large families are also at risk of being severely impacted by other welfare reforms such as the Benefit Cap.</p> <p>Feedback from the consultation, in particular Harrow Mencap, demonstrated concern for black minority ethnic and refugee groups both because there are more large families within these communities and because there are higher levels of disability within some communities.</p> <p>Some claimants may be impacted through language barriers and therefore Awareness Campaign needs to consider this.</p>	<p>allowances to account for dependent children</p> <p>All children in school years 1 & 2 will receive free school meals from September 2014 which will assist low income working families who may not have previously been entitled.</p> <p>Working age households who work will also continue to have some of their earnings disregarded within the CTS scheme under the proposals being taken to members.</p> <p>Other generic mitigations are listed under the Age characteristic above</p>
Religion or Belief		<p>This information is collected on the claim form where the applicant completes these questions however is not able to be collected on the Council Tax Support system. This information is unreliable as the data is not often completed by the claimant and therefore will not be used to inform this EqIA.</p> <p>No detrimental impacts have been identified for any of these groups</p>	
Sex		<p>42% of Council Tax Support recipients are male and 58% female. (Where there is a couple claiming the sex of the claimant has been used in</p>	<p>Having considered the feedback from the consultation and the potential impacts identified, a recommendation is being put to Cabinet to retain the current Council Tax</p>

			<p>these statistics.)</p> <p>34% of people claiming Council Tax Support are lone parents.</p> <p>96% of lone parents that are currently claiming Council Tax Support are women and therefore there is an impact for this protected characteristic.</p> <p>Lone parents who are not in receipt of Job Seekers Allowance (Income based) Income Support or Employment Support Allowance (Income related) or fall within in the disabled group will be affected.</p> <p>35.9 % of lone parents that are currently claiming Council Tax Support work of these 95 % are female and 5% are male. These females would therefore be disproportionately adversely affected by the proposals to use child benefit as income, remove the additional earnings disregard and increase the minimum council tax support level.</p>	<p>Support scheme. This will alleviate the impacts identified and therefore mitigations specific to changes to CTS will not be required.</p> <p>The mitigations detailed below were brought together in response to the impacts should the proposed schemes be implemented. Some items will be implemented outside of the CTS scheme review as they are part of a broader response to welfare reform and not specific to CTS.</p> <p><u>Mitigations specific to Sex characteristic if proposed changes were implemented</u></p> <p>Working age households who are in receipt of Job Seekers Allowance (Income Based), Income Support or Employment Support Allowance (Income Related) and do not fall in to the Disabled category will not be affected by the proposals unless they have non-dependents living in the household</p> <p>All of the proposals intend to retain the disregard of child maintenance and additional amount added to household allowances to account for dependent children</p> <p>Lone parents will continue to get the higher standard earnings disregard of £25</p> <p>Other generic mitigations are listed under the Age characteristic above</p>
Sexual		✓	This information is not held on the Council Tax Support system however of those that responded	

orientation			<p>to this question in the consultation 86% stated they were heterosexual, 7% bisexual, 6% other and 1% gay man.</p> <p>No detrimental impacts have been identified for any of these groups</p>				
<p>11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?</p> <p>If yes, which Protected Characteristics could be affected and what is the potential impact?</p>			Yes	✓	No		

The Council will be required to find savings of approximately £75 million by 2018/19 and is currently consulting on proposals for changes to services across the Council to identify this saving

The EqlA subgroup highlighted the following cumulative impacts

- Young people living independently may have shortfalls in Housing Benefit and will be affected if they cannot sustain tenancies, they will have to be re-housed or become homeless causing a higher level of vulnerability.
- People coming off Incapacity benefit often struggle to obtain ESA (support group component) so will come out of the disabled group so will be put into a vulnerable position
- Impact for those paying care contributions and transport costs will be cumulative.
- There is daily impact of cumulative changes for people who work and have static incomes with outgoings increasing. They often pay fuel & food bills first over Council Tax as they consider those as priorities.
- The make-up of many Asian families could mean they are cumulatively affected by reduction due to liability cap, nondependent deductions and welfare reforms.
- There may be a cumulative impact where the recipient of Council Tax Support is affected by more than of the welfare reforms.

As Personal Independence Payments (PIPs) is rolled out in Harrow, households currently in receipt of CTS as a disabled working age household, may lose their entitlement to a disability benefit and therefore transfer into the working age other group and receive a lower level of CTS

There is potential for additional reductions to welfare provision in coming years following an announcement at the Conservative Party conference of this intention. It is not possible to state what the cumulative impacts of these additional changes would be without detail behind the announcement, but it is anticipated that any further reductions to the incomes available to low income households will have accumulative adverse impacts.

11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?

If yes, what is the potential impact and how likely is to happen?

Yes	✓	No	
The Council will be required to find savings of approximately £75 million by 2018/19 and therefore there is likely to be changes to other services. This will be monitored throughout the consultation and any information will be included.			

12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on [Harrow HUB/Equalities and Diversity/Policies and Legislation](#)

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

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 6: Decision

13. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.

Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7*

Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA 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 13a below)**

x

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)

13a. If your EqIA is assessed as **outcome 3** or you have **ticked 'yes' in Q12**, explain your justification with full reasoning to continue with your proposals.

The assessment has identified that the proposed options would have a potential adverse impact on certain protected groups, specifically (1) age, due to working age claimants being impacted, as opposed to pension credit age claimants; (2) disability, due to the proposal to take into account disability benefits; (3) gender, due to a higher proportion of lone parents being female and the proposal to take account of child benefit as income; (4) race, due to some evidence that larger families are more likely to come from certain racial groups.

Whilst there are a number of mitigating steps which have been put in place, the proposal has been amended to recommend keeping the current scheme.

Stage 7: Improvement Action Plan

14. 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 required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
The areas of potential adverse impact identified above are in relation to the					

<p>implementation of proposed changes to the Council Tax Support scheme. With a recommendation going to members to retain the existing scheme, there are no new impacts requiring mitigating action. Many of the mitigations listed above will still be implemented as they relate to the Council's broader response to welfare reform, but actions are not detailed here.</p>					
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Stage 8 - Monitoring

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

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to

Proposing to monitor through the following mechanisms:
 - Complaints

ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	<ul style="list-style-type: none"> - Appeals - Applications to the Hardship Fund/Welfare Assistance Scheme - Level of arrears
16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Monitoring will be reported through to the multi-agency Community Reference Group
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	Negative feedback has been received through the consultation regarding the proposals. These are included within the consultation element of this EqIA and in the Consultation Feedback Report.

Stage 9: Public Sector Equality Duty

18. How do your proposals contribute towards 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.

(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)

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
Decision taken to review the Council Tax Support Scheme as a direct result of funding gap of £75m over the next four years. The proposals will be considered by elected Members in line with the consideration of the overall budget.	<p>Modelling has been carried out to balance the impacts across differing characteristics and feedback from the consultation is taken into account.</p> <p>When modelling the 4 schemes that were put to consultation consideration was given to the ability to pay.</p>	<p>The consultation was carried out ensuring differing groups within the community were given the opportunity to be involved and have their say.</p> <p>If proposed changes are agreed the awareness strategy will be developed to meet the needs of the community within Harrow.</p>

Stage 10 - 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.

19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	
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Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:		Date:	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	