

Equality Impact Assessment (EqIA)



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)

Type of Decision:	<input type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state) Full Council	
Title of Proposal	Technical Changes to Council Tax Support	Date EqIA created 29 th May 2019
Name and job title of completing/lead Officer	Jenny Townsley Housing Benefit Service Manager	
Directorate/ Service responsible	Housing Benefits, Resources	
Organisational approval		
EqIA approved by Directorate Equalities Lead	Name Alex Dewsnap	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 6/12/19

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

a) What is your proposal?

Following consultation with stakeholders, Harrow's Council Tax Support scheme has been modernised to ensure it is fit for purpose following the roll out of Universal Credit. The proposed new scheme is being brought to Cabinet in January and February in February prior to implementation from 1st April 2020.

Universal Credit will create additional work and therefore cost more to administer Council Tax Support in its current form. This is because Universal Credit is a monthly benefit which will potentially change on a monthly basis. Entitlement under the current Council Tax Support scheme will change every time Universal Credit changes. This not only costs more to administer but is also confusing to claimants who could struggle to know how much Council Tax they have to pay. It could also impact on the Council's ability to collect Council Tax. Furthermore, as the Council will no longer have to administer Housing Benefit, the economies of scale from aligning Council Tax Support with Housing Benefit are lost and the benefits of a complex means tested Council Tax Support scheme cannot be justified if information is not required for the assessment of Housing Benefit as well as Council Tax Support. This impact of Universal Credit was set out in the National Audit Office's report into the rollout of Universal Credit in June 2018. The report identified the impact of multiple changes on local authorities and suggested that local schemes could be changed to mitigate this impact <https://www.nao.org.uk/report/rolling-out-universal-credit/> (Figure 17, page 48 and figure 26 page 74).

Since the introduction of Universal Credit in Harrow it has also been identified that the number of claims from working age households has reduced at a faster rate than prior to Universal Credit rollout. The Department for Work and Pensions survey in March 2019 included findings that nationally 59% of Universal Credit claimants did not know they needed to make a separate claim to the local authority for help with their Council Tax, <https://www.gov.uk/government/publications/universal-credit-full-service-omnibus-survey> , indicating that low income households are not always claiming all of the benefits they are entitled to.

It is therefore proposed to make the following changes to the Council Tax Support scheme to mitigate the impacts of Universal Credit. As Council Tax Support for pensioners is under a prescribed scheme set by Ministry of Housing, Communities and Local Government, these proposals will only affect working age Council Tax Support claimants.

Introduce an income banded scheme

The proposed banded scheme will use the claimant and partner's total gross earned income. Gross earned income

includes earnings from employed and self-employed work before any deductions such as for tax, national insurance or pensions. The household will be placed in one of the income bands set out below depending on their income and the household make up. They will receive a maximum amount of Council Tax Support between 0% and 86% depending on the band they are in.

Disabled and War Pension recipients*		Not classified as disabled under the Council Tax Support scheme		Not in receipt of maximum Universal Credit and not classified as disabled under the Council Tax Support scheme							
% Award	In receipt of maximum Universal Credit or in-work	% Award	In receipt of maximum Universal Credit	% Award	Single people without children	% Award	Couple without children	% Award	Lone parents	% Award	Couples with children
					Gross earned income**		Gross earned income**		Gross earned income**		Gross earned income**
86%	No earned income or gross earned income up to the £440.00	70%	Maximum Universal Credit	65%	£0-£75	65%	£0-£75	65%	£0-£75	70%	£0-£100
				50%	£75.01-£125	60%	£75.01-£125	60%	£75.01-£125	60%	£100.01-£150
				40%	£125.01-£175	50%	£125.01-£175	50%	£125.01-£175	50%	£150.01-£200
				0%	>£175	40%	£175.01-£225	40%	£175.01-£225	40%	£200.01-£250
						0%	>£225	30%	£225.01-£275	30%	£250.01-£300
								0%	>£275	20%	£300.01-£375
										0%	>£375

* Working Age Disabled and War Pension recipients (working age) – which consists of households where the customer, a partner or a dependent child is physically or mentally disabled and receives one of the following: Personal Independence Payments, Disability Living Allowance, Employment Support Allowance (Support group), Incapacity Benefit, Mobility Supplement, Severe Disablement Allowance; people who are registered blind; people who live in a property which has been granted a disabled band reduction; or anyone who is working age and receives War Disablement Pension or War Widows Pension.

** The gross income is calculated by totalling the claimant and partner's gross earned income. Gross earned income is the amount of earnings paid for either employed or self-employed work before any deductions are taken for tax, national insurance, pensions etc.

Reduce the number of non-dependant deductions

A non-dependant is an adult in the household who is not the claimant or partner. The deduction is the amount of Council Tax Support that the claimant's award is reduced by for each non-dependant. The current amount of the deduction depends on the non-dependant's income. The deductions in the current scheme are set out below:

Non Dependant Income	Rate of weekly deduction
Aged under 25 and on Income Support, Job Seekers Allowance (Income Based) or Employment Support Allowance (Income Related) assessment phase	£3.30
Aged 25 or over and on Income Support or Job Seekers Allowance (Income Based)	£3.30
Aged 18 or over and not in remunerative work	£6.60
In receipt of main phase Employment Support Allowance (Income Related)	£3.30
In receipt of Employment Support Allowance contribution based	£3.30
In receipt of Job Seekers Allowance contribution based	£6.60
In receipt of Pension Credit	£3.30
Gross income less than £207.70	£6.60
Gross income not less than £207.70 but less than £360.10	£13.10
Gross income not less than £360.10 but less than £447.40	£16.50
Gross income not less than £447.40	£19.80

It is proposed to replace the above with a single deduction for all non-dependants irrespective of their income. This would be at a rate of £7.00 a week for each non-dependant. As in the current scheme, if the claimant or partner receives Disability Living Allowance Care Component or the Daily Living element of Personal Independence Payment then a non-dependant deduction will not be applied. Furthermore, students will continue to be exempt from non-dependant deductions.

Use a Universal Credit notice as a claim for Council Tax Support

When a claim is made for Universal Credit the Department for Work and Pensions (DWP) ask the claimant if they would like to claim Council Tax Support. If the claimant agrees then the Department for Work and Pensions will send a notification to the Council to inform them of the claimant's intent to claim Council Tax Support. It is proposed to accept this notification as a claim for Council Tax Support. This proposal will make it easier for people to claim Council Tax Support and increase the number of people accessing the assistance they are entitled to in Harrow.

Making Universal Credit a qualifying benefit

It is proposed to only award Council Tax Support to households where the claimant or partner are in receipt of Universal Credit. When people start to receive Universal Credit they will move onto the new income banded scheme set out above. Once the rollout of Universal Credit is complete (Government currently expect this to be by end of 2023), the existing Council Tax Support scheme will be deleted and anyone who is not entitled to Universal Credit will no longer be able to receive Council Tax Support.

By adopting this approach Harrow's Council Tax Support scheme will retain elements from Universal Credit which some of the Council Tax Support schemes set by other boroughs have removed, such as a capital limit of £16,000 for claimant and partner.

An exception to the Universal Credit qualifying rule will be for people in receipt of contribution based Job Seekers Allowance and Employment Support Allowance if they meet the following criteria. These people will be treated as if they receive maximum Universal Credit in the income banded scheme

- not in receipt of Universal Credit; and
- receive JSA(C) or ESA(C); and
- have no other income or their only other income is disability benefits that are disregarded under the current Council Tax Support scheme; and
- have under £16,000 in capital

Transitional Protection for those detrimentally affected

Households in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020 will be assessed for Transitional Protection. Transitional Protection will be awarded where the loss of entitlement under the new scheme is 10% or more of entitlement under the existing scheme and will be calculated as 50% of the amount lost. The award will be made on 1st April 2020 for the year 2020/21 only and will not be adjusted irrespective of changes in the claimant's circumstances whether beneficial or detrimental, other than to not exceed their Council Tax liability..

When developing these proposals consideration was given to known potential impacts on groups with protected characteristics and steps were taken where possible to remove or minimise any negative impacts for those people. For example, people with disabilities will retain the protection of a higher rate of entitlement up to 86% of their council tax liability; and the inclusion of different categories for different groups of people e.g. people with and without children. Carrying out the Equality Impact Assessment helps to understand further any unforeseen impacts on protected characteristics.

This Equality Impact Assessment has initially been carried out in advance of the consultation to understand potential impacts on groups with protected characteristics. The data used is based on the whole Council Tax Support caseload having transferred onto Universal Credit. In reality this migration of customers onto Universal Credit is expected to be a phased change which is dependant on the Department for Work and Pensions rollout plan, currently scheduled to be completed by Dec 2023.

The impacts focus on the combined impact of all of the proposals.

Some data is not available for certain characteristics and for others it is limited. This is noted against each characteristic below.

Where comparisons are made to borough data, it should be recognised that borough data is frequently based on the population while Council Tax Support data is usually based on the person making the claim and not their partner or other members of the household. The data therefore gives an indication of whether there are impacts on certain characteristics but does not allow for a direct comparison across the borough.

An 8 week consultation will be carried out between 29th July 2019 to 22nd September 2019 to capture the views of Harrow residents and stakeholders on the proposed changes. The preceptor, GLA (Greater London Authority), will also be consulted as is required by statute. The consultation booklet and questionnaire can be found in Appendix 1 and 2.

b) Summarise the impact of your proposal on groups with protected characteristics

There are 6,698 working age households in receipt of Council Tax Support. The table below shows how many households will be affected and whether the impact is positive (gain) or negative (loss). It also shows the value of change to entitlement. Impacts can be seen in the charts held in Appendix 3

Impact on entitlement. Weekly	Number of households impacted	% of households impacted
Total working age	6698	
No change	3764	56.2%
Gain up to £1	115	1.7%
Gain £1 - £5	428	6.4%
Gain £5 - £10	470	7.0%
Gain £10 - £15	214	3.2%
Gain £15 - £20	47	0.7%
Gain over £20	27	0.4%
Total gain	1301	19.4%
Loss £1 or under	265	4.0%
Loss £1 - £5	925	13.8%
Loss £5 - £10	354	5.3%

Loss £10 - £15	66	1.0%
Loss £15 - £20	15	0.2%
Loss over £20	8	0.1%
Total loss	1633	24.4%

The main reason for change is the introduction of an income banded scheme in place of a means test. This results in relatively low levels of gain and loss of mostly under £5 a week.

Other key reasons households could gain are:

- if they have income other than earnings, for example a private pension as this is not taken into account in the assessment
- if they are classified as disabled and do not currently receive the maximum 86% award
- if they are on low earnings and receive tax credits
- if they have non-dependants who are in work

Other reasons some households may see a reduction to their entitlement are:

- they are not currently in receipt of tax credits they are entitled to and are in receipt of a higher rate of Council Tax Support than they should be if they claimed all the benefits they were entitled to. When they claim Universal Credit their tax credit equivalent will increase so their overall income will be higher even though their Council Tax Support entitlement is less
- the more children a working household has, they become more likely to lose because of the removal of the means test
- households who pay more for child care will lose more
- If their income is currently below their applicable amount (the amount the Benefits system says the household needs to live on)
- They will not qualify for Universal Credit

The table below shows the impact due to the proposed changes to non-dependant deductions.

Impact on entitlement due to proposed change to non-dependant deductions. Weekly	Number of households impacted	% of households impacted
Total household with a non-dependant	1609	
No change	1041	64.7%
Gain up to £1	0	0.0%
Gain £1 - £5	17	1.1%
Gain £5 - £10	74	4.6%
Gain £10 - £15	52	3.2%
Gain £15 - £20	0	0.0%
Gain over £20	0	0.0%
Total gain	143	8.9%
Loss £1 or under	264	16.4%
Loss £1 - £5	130	8.1%
Loss £5 - £10	24	1.5%
Loss £10 - £15	7	0.4%
Loss £15 - £20	0	0.0%
Loss over £20	0	0.0%
Total loss	425	26.4%

Households are more likely to gain because there is a non-dependant in the household who earns more than £207.70 a week. Households with non-dependants who are not in work or who earn less than £207.70 a week are more likely to lose as a result of this proposal. The more non-dependants in this situation, the greater the reduction to Council Tax Support, although it should be noted that while the claimant/partner remain liable for payment of the Council Tax, it is intended that the loss due to changes to non-dependant deductions is spread across each of the non-dependants. This lowers the level of loss per person.

The proposal to accept the Universal Credit notification as a claim for Council Tax Support is expected to reduce barriers for all residents to claim Council Tax Support. By not requiring a separate application to be submitted to the Council in addition to the Universal Credit claim made to Department for Work and Pensions, people who may not previously have known or felt able to make a claim for Council Tax Support should now be more likely to receive the assistance they are entitled to.

Amending the scheme to restrict eligibility to those who are in receipt of Universal Credit or contribution based Job Seekers Allowance/Employment Support Allowance is forecast to impact 23 households who are currently in receipt of Council Tax Support. This will not impact until the rollout of Universal Credit in the borough is complete.

Age

Only working age claimants will be impacted by these proposals. There may be non-dependant pensioners or children living in affected households, but the changes won't affect pensioner claimants.

The 35 – 44 age group are slightly more likely to see a reduction to their entitlement than other households (31% compare to 24% of the total caseload). This is because they are more likely to be in-work, less likely to be classified as disabled and there are slightly more households with 5 or more children in this group.

Of the 23 households expected to lose entitlement in 2023 due to no entitlement to Universal Credit, 12 are in the 55-64 age group.

Households with children

Households with children are more likely to be impacted proportionately to the caseload as a whole, in part because these households are more likely to claim Council Tax Support in the borough (59% of the working age caseload have children). This

means that while more will lose, there will also be more who gain.

31% (1,241) of households with children will lose compared to 24% of the total caseload.

The value of the reduction is also more likely to be greater with 9.9% (394) households with children losing more than £5 a week compared to 6.6% (443) in the caseload as a whole. 310 lose £5 - £10, 84 households lose more than £10 a week.

The more children there are in a household, the more they will lose: 15.7% of households with 3+ children will lose over £5 (5.7% in the total caseload) and 29.3% of households with 5+ children will also lose more than £5 a week.

The reasons for loss are:

- They are more likely to be in work (56%) than the caseload as a whole
- There are proportionately more households with children in receipt of Council Tax Support than there are in the borough as a whole
- A number of households with children are not claiming all of the tax credits they are entitled to
- Larger families will lose out due to the removal of the means test so there is no additional benefit awarded to account for the extra cost of having more children
- Households paying more child care costs will lose more Council Tax Support under these proposals. This is because, unlike in the current scheme, there is no deduction from earnings for child care costs in Council Tax Support so the level of earnings used to assess entitlement will be higher
- Proportionately less households with children are disabled than in the caseload as a whole. Disabled groups are less likely to be detrimentally impacted by these proposals

For households with children who gain, 26% will gain compared to 19% of the caseload as a whole. Households with 3 or 4 children are most likely to gain, while households with 5+ children are least likely.

The value of gain is also higher for households with children, except where there are 5+ children.

Disability

Most households who are disabled will see no change as a result of these proposals: 2,625 (88%). This is because most are already in receipt of maximum Council Tax Support and non-dependant deductions are more likely to be disregarded.

8% (247) will gain. This is because households who are classified as disabled under the scheme and are in-work will now be treated the same as out of work households, receiving 86% of their Council Tax liability less any non-dependant deduction if they are not disregarded.

4% (121) will lose. Any losses are as a result of the proposals to change the non-dependant deductions. The value of loss is less than the caseload as a whole with 111 households losing less than £5 a week and 10 households losing £5 - £15.

While some of the loss is offset by gains from the banded scheme, 130 disabled households will lose due to the proposed changes to non-dependant deductions. 120 lose under £5, 10 lose £5 - £15

While low in number, disabled households are disproportionately impacted by the proposal to use Universal Credit as a qualifying condition for Council Tax Support. Of the 23 households who are forecast not to qualify for Universal Credit, 16 are classified as disabled under the Council Tax Support scheme. Most are in receipt of contribution based Employment Support Allowance with other incomes. Depending on the type of Employment Support Allowance the contribution based award may only last upto one year (for work related) after which the claimant may then be able to qualify for Universal Credit. If the scheme were amended to give access to these households it would risk opening up access for a large number of other households and therefore scheme spend will rise. This additional expenditure cannot be quantified as the Council only holds data on current claims, not potential claims.

Carers

Households in receipt of Carers Allowance are also less likely to see a change and are less likely to lose as a result of these combined proposals.

They are however more likely to see a reduction to entitlement as a result of the proposed changes to non-dependant deductions, with 78% of those households with a Carer Allowance and a non-dependant deduction losing. 74% will lose under £5, 4% over

£5. This loss will in part be offset by other changes to the scheme so overall this group are less likely to lose than the caseload as a whole (13.6% compared to 24%).

Of the 23 households who are forecast not to be entitled to Universal Credit and will therefore not be eligible for Council Tax Support, 7 are in receipt of Carers Allowance. 6 of these are classified as Disabled under the scheme.

Marriage and Civil Partnership

Data on civil partnerships is not available.

As couples in receipt of Council Tax Support are more likely to have children and are more likely to be in-work, they are more likely to experience change to their Council Tax Support (62% of couples compared to 43% of the total caseload). 32% (801) of couples' Council Tax Support will reduce as a result of the proposals. 13% (329) will lose more than £5 a week.

31% (377) will gain compared to 19% of the total caseload.

Race

This information is based on 34% of the Council Tax Support caseload who provided Race monitoring data.

Black or Black British (total of 377 households), mixed race households (85) and White British or Irish (706) are more likely to see no change to their entitlement.

Other Asian or Asian British households (626) more are likely to lose (31% compared to 24% of the total caseload) but more are also likely to gain (31% compared to 19%). This is because households with this characteristic are more likely to not receive maximum Universal Credit.

Similarly, White Other households (95) more are likely to lose (31%) but more are also likely to gain (34%) because there are more households in this characteristic who are in work.

Sex

Men are most likely to see no change to their entitlement. However, male lone parents (97 households) are more likely to see a reduction to their entitlement (34% compared to 24% of the total caseload) and less likely to see an increase (11% compared to 19%). 91 will lose under £5 a week and 6 will lose £5 - £10.

Single people without children are less likely to see any change to their entitlement. This is because a high proportion of this group are out of work or are classified as disabled.

c) Summarise any potential negative impact(s) identified and mitigating actions

The main impact, both positive and negative, that this Equality Impact Assessment has identified is on households with children and households in work or not in receipt of maximum Universal Credit.

Households in work or not in receipt of maximum Universal Credit will see a relatively low level of change, mostly around £5 a week or less. Some will gain and some will lose. It is known that if the overall funding does not change, then when introducing an income banded scheme to replace a means tested scheme some recipients will receive more while others will receive less. However, the level of change has to be balanced with the potential impacts of not changing the scheme:

- The effect of a high number of changes in circumstance to a household's Council Tax Support entitlement as a result of fluctuations in earnings and Universal Credit.
- A simplified Council Tax Support scheme will prevent an increase in administration costs that will be experienced in the current scheme as more households move onto Universal Credit. Furthermore, as the Housing Benefit administration grant reduces due to housing costs moving into Universal Credit, the relative cost per claim of administering Council Tax Support will rise if the complex means test remains.
- The simplified scheme will be easier for residents to understand and to know what they are entitled to, and with less changes making it easier to budget.
- Less changes to entitlement will reduce the risk to Council Tax collection which could result from the recovery cycle continually being reset each time a new bill is issued.

Analysis of the impacts for larger families has identified that some households are not receiving all of the benefits they may be entitled to. This is usually tax credits which will be incorporated into the Universal Credit award so, while these households will receive less Council Tax Support, their overall income will be higher.

Some households also appear to have an income that is lower than their applicable amount (the amount the government say a household needs to live on). This could either be because they don't receive all of the tax credits they are entitled to, or because Council Tax Support do not hold current earnings details. The reduction to the amount of Council Tax Support these households will receive when they move onto Universal Credit is therefore at least in part due to them receiving the correct amount of tax credit equivalent, and Council Tax Support holding the correct income details for them, and not solely because of the mechanics of the proposed new Council Tax Support scheme.

Some households who pay child care costs will also be negatively impacted. Universal Credit gives an additional element toward Child care costs, but child care costs will no longer be taken as an expense from Council Tax Support. The level of impact of this change will depend on how much is spent on child care and how much the claimant and/or their partner earn.

In addition to above, feedback from the consultation has been taken into consideration. The full response from the consultation can be found in the Consultation Feedback report in Appendix 5. 211 questionnaires were returned from the public and feedback was captured from two workshops with the voluntary sector including return of 8 questionnaires. While overall most of the proposals were deemed to be favourable, key points from the consultation are:

- Income banded scheme is unfair and doesn't treat people equally. Scheme needs to take into account household size and expenditure. Particular concern was noted for families in this respect with the voluntary sector citing large families as being at risk
- Means test is fairer and most people who were not in favour of a banded income scheme who commented, stated they thought a means test should be retained
- More support should be given to lower income households
- Net earnings should be used in place of gross as this is easier for people to understand
- The single non-dependant deduction was detrimental to lower income people and £7 was too high. A number of respondents therefore believe that there should be more than one rate of deduction
- A level of concern was raised regarding the use of Universal Credit as a qualifying criteria for Council Tax Support
- Groups the consultation identified that respondents believed would be affected by the proposals were disabled, those in employment, families and young adults including non-dependants about to turn 18 years. Some of the voluntary sector respondents also raised concern about barriers to claiming for people with literacy and language barriers and people who have taken early retirement and are only in receipt of a private pension as these groups may struggle to access Universal Credit and therefore be unable to claim Council Tax Support.

In response to the equality impacts identified and consultation feedback, Members have allocated an additional £400,000 to the Council Tax Support scheme to assist in mitigating some of the above detrimental impacts. Following the consultation the scheme has been adjusted in the following ways:

- Include additional categories for households with 3 or more children
- Make the minimum award 70% across all non-vulnerable groups
- Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement
- Implement two non-dependant deductions in place of the proposed one
- Use net earned income instead of gross

The revised scheme is:

	Claimant Category C		Claimant Category D		Claimant Category E1		Claimant Category E2		Claimant Category F1		Claimant Category F2
Percentage award of weekly eligible Council Tax	Single people without children - weekly net income	Percentage award of weekly eligible Council Tax	Childless couples- weekly net income	Percentage award of weekly eligible Council Tax	Lone parents up to 2 children weekly net income	Percentage award of weekly eligible Council Tax	Lone parents 3 or more children- weekly net income	Percentage award of weekly eligible Council Tax	Couples with up to 2 children- weekly net income	Percentage award of weekly eligible Council Tax	Couples with 3 or more children- weekly net income
70%	£0-£75	70%	£0-£75	70%	£0-£100	70%	£0-£100	70%	£0-£125	70%	£0-£125
60%	£75.01-£125	60%	£75.01-£125	60%	£100.01-£140	60%	£100.01-£150	60%	£125.01-£165	65%	£125.01-£150
40%	£125.01-£175	55%	£125.01-£175	55%	£140.01-£175	55%	£150.01-£200	55%	£165.01-£200	60%	£150.01-£200
0%	>£175	40%	£175.01-£225	40%	£175.01-£225	45%	£200.01-£275	40%	£200.01-£250	50%	£200.01-£275
		0%	>£225	30%	£225.01-£275	30%	£275.01-£325	30%	£250.01-£300	35%	£275.01-£375
				0%	>£275	0%	>£325	20%	£300.01-£375	20%	£375.01-£425
								0%	>£375	0%	>£425

The vulnerable group will remain at the originally proposed 86% and the maximum Universal Credit group at 70%.

Non-dependant deductions were proposed to be set at £3.30 a week for people not in work and £12 for people who are working to reduce the impact on those not in work. This proposal has been amended further as set out below

These proposed changes assist in reducing the impacts of the banded scheme on individual households but enable the scheme to

achieve the original objectives to mitigate the impact of the rollout of Universal Credit.

The total scheme impacts as a result of these changes are in the table below. Charts setting out monitoring data analysis for protected characteristics is in Appendix 4. The data is slightly different to the pre-consultation analysis because it is based on more current Council Tax Support data.

Impact on entitlement. Weekly	Number of households impacted	% of households impacted
Total working age	6686	
No change	4470	66.9%
Gain up to £1	114	1.7%
Gain £1 - £5	434	6.5%
Gain £5 - £10	497	7.4%
Gain £10 - £15	269	4.0%
Gain £15 - £20	101	1.5%
Gain over £20	36	0.5%
Total gain	1451	21.7%
Loss £1 or under	46	0.7%
Loss £1 - £5	477	7.1%
Loss £5 - £10	198	3.0%
Loss £10 - £15	32	0.5%
Loss £15 - £20	8	0.1%
Loss over £20	4	0.1%
Total loss	765	11.4%

By comparing the above table to the table of impacts for the original proposals, it is evident that the level of detrimental impact has

been reduced.

The impacts solely due to the non-dependant deduction change to the two rates of £3.30 and £12 are set out in the table below for comparison to the table based on the original proposal earlier in this assessment

Impact on entitlement due to proposed change to non-dependant deductions.	Number of households impacted	% of households impacted
Weekly		
Total household with a non-dependant	1609	
No change	1041	64.70%
Gain up to £1	33	2.05%
Gain £1 - £5	193	12.00%
Gain £5 - £10	83	5.16%
Gain £10 - £15	0	0.00%
Gain £15 - £20	7	0.44%
Gain over £20	0	0.00%
Total gain	316	19.64%
Loss £1 or under	0	0.00%
Loss £1 - £5	11	0.68%
Loss £5 - £10	109	6.77%
Loss £10 - £15	4	0.25%

Loss £15 - £20	2	0.12%
Loss over £20	2	0.12%
Total loss	128	7.96%

This proposal for non-dependant deductions had a disproportionate impact on low income employed non-dependants as they would potentially move from paying £6.60 in the current scheme to paying £12 in the new scheme. The proposal has therefore been adjusted to extend the £3.30 rate to include non-dependants who earn less than £144 gross a week (National Minimum Wage at 16 hours a week). While some additional funding has been allocated to pay for this change, the higher rate non-dependant deduction has also been increased slightly to offset some of the additional cost that this proposal brings and is proposed to be set at £13.10. 64 households will now lose as a result of the proposed change to non-dependant deductions compared to the 128 shown in the table above. Some now lose slightly more due to the increase at the higher rate to £13.10, some who have more than one non-dependant lose slightly less because of the combined impact of changing both deductions. 10 households lose £10 - £20, 44 households lose £5 - £10 and 10 lose under £3.20.

The residual equality impacts are:

Age

While the proposals continue to be for working age households only, there is no age group who is disproportionately impacted when compared to the proportion of the caseload that each group accounts for. However 37% of the households losing £5 or more are in the 35-44 age group. Of the 44 households losing more than £10, 22 are in the 35-44 age group, 10 in the 45-54 age group, 7 in 25-34 and 5 aged 55–64.

Children

Households with children continue to be overrepresented within the Council Tax Support caseload compared to the borough as a whole. Following the proposed changes, 17% of the caseload with children will lose compared to 11% of the total caseload.

The level of loss has reduced with 4.6% of households with children forecast as losing over £5 a week once the new scheme has fully rolled out in Harrow. 5.1% of households with 3 or more children will lose £5 or more while they account for 30% of the total caseload.

Of those households who are forecast to lose £5 or more entitlement, the spread of the impact across households with children is more even compared to the proportion of the caseload that they account for, so there is not a disproportionate impact for larger families. Households with children, however, do remain more likely to lose £5 or more than households without children, with 75% of those predicted to lose at this rate are households with children compared to 59% of the total caseload being this cohort.

There are 39 households with children who are forecast to lose more than £10 a week. 56% of these (22 households) have 1 or 2 children, while 44% (17) have 3 or more children. These groups account for 58% and 42% of the households with children so again the impact is more evenly distributed across these households. However, households with children are much more likely to see a higher level of loss than other households with 5 of the total 44 households forecast to lose more than £10 not having children in them.

Disabled

The proposed changes to the scheme reduce the proportion of disabled households who are forecast to lose from 4% to 1.2% (37 out of 3,020 households). The main reason for loss is the change to the non-dependant deduction. Using the rates of £3.30 and £12, 33 of the 34 disabled households who are expected to lose more than £5 a week, do so because of the non-dependant deduction proposal. 3 of the 4 disabled households losing more than £10 a week do so because of this proposal.

By extending the lower non-dependant deduction rate to include low income earners and increasing the higher rate to £13.10, less disabled households are impacted. 38 disabled households are forecast to lose following this change, with 3 losing £1 - £5, 28 losing 5 - £10, 5 losing £10 - £15 and 2 losing over £20.

Carers

The changes to the proposals are expected to result in less households where the claimant or partner receive Carers Allowance losing some of their entitlement to Council Tax Support. 4.8% (45 of the 923 households in this cohort) are forecast to lose. Of these, 3.4% (31) are forecast to lose more than £5.

Couples

Data for civil partnerships and same sex couples is not available.

Data for people living together as a couple indicates that the number experiencing no change will increase following the changes to the proposals (from 38% to 55%) and the number losing will reduce (from 32% to 19%). As the majority of couples have children (85%), the impacts will be similar to those for households with children.

Race

Following analysis of the available monitoring data for Race, it has been identified that Other Asian or Asian British and White Other households are more likely to lose than the caseload as a whole (16%, 98 households, and 20%, 18 households, respectively compared to 11% for the total caseload. South Asian or South Asian British households are more likely not to lose (6%).

The value of loss is split proportionately across the caseload when analysing Race impacts relative to the proportion that each group accounts for in the caseload as a whole. The highest number losing £5 or more is Other Asian or Asian British and White British/Irish who each have 24 households forecast to lose at this rate which equates to 30% of the total number losing. Black or Black British account for 20% of households losing £5 or more, equivalent to 16 of the 81 households.

Households where Race data is held, 44 will lose as a result of non-dependant deduction changes. 17 of these are White British/Irish and 10 each account for Black or Black British or Other Asian or Asian British households.

Following the further change to non-dependant deductions, 16 households where Race data is held will lose as a result of non-dependant changes to the scheme. 8 of these households are White British/Irish while the other 8 are spread across different groups.

Sex

There are 1,076 households of single men with no children or lone parents and 2,896 single females with no children or lone parents. This is split over 99 male lone parents and 1,655 female lone parents.

None of these groups are more likely to lose or to lose more as a result of the revised proposals proportionate to the number of claims they account for in the caseload. 188 lone parent households are forecast to lose, with 56 losing more than £5 a week and 11 losing more than £10. 2 male lone parents are forecast to lose more than £5 and 52 female lone parents. 10 female lone

parents are forecast to lose more than £10. Note, where numbers don't total it is due to the sex of the claimant not having been declared.

The impacts resulting from the use of Universal Credit as a qualifying criteria remain unchanged under the revised proposals. The voluntary sector flagged this as a concern in the consultation particularly for people with language or literacy barriers and people who have taken early retirement and are living off a private pension. The mitigation of additional funding and the review of the Council's Council Tax Hardship fund policy under s13A(1)(c) will however potentially help these households.

To mitigate the impact of any loss to Council Tax Support if the proposals are implemented and to assist households who are more negatively impacted the following actions are proposed. This activity also sets out how the Council seeks to support people as they transition on to the new scheme. It is important to recognise that the impacts set out in this assessment are based upon the whole caseload having transitioned onto Universal Credit but this will be a phased approach over the course of 3 – 4 years:

- A publicity campaign will be carried out to inform people how their Council Tax Support entitlement could change in advance of them moving onto the new scheme. The campaign will set out the new scheme in simple terms to ensure residents are able to understand how it works.
- The Council will write to people who are expected to lose out under the new scheme to advise them of the change in advance to help them to start to budget accordingly and to access support if required.
- An online calculator is available for Harrow's bespoke Council Tax Support scheme. This enables residents to see how much Council Tax Support they will be entitled to. A Universal Credit 'better-buy' calculator is also available through the Harrow website which informs residents of whether they will be better off on Universal Credit and what benefits they could be entitled to.
- Anyone identified as not receiving the full benefits they are entitled to will be written to and advised of this. They will either be able to claim additional tax credits to reflect their true circumstances, or, if they don't currently receive any tax credits, then they will be informed that if they claim Universal Credit that their income could increase.
- It is possible to include additional categories for households with children (lone parents and couples) to give higher awards to those with 3 or more children. This proposed change will be considered depending on the outcome of the consultation and to what extent modelling indicates it will mitigate the impact of the proposals.

- A review of earned income claims will be carried out to ensure the correct amount of earnings is held on the Council Tax Support claim. This will reduce the impact of change when the household moves onto Universal Credit. Due to the volume of claims and resources required, it is not possible to review all self-employed claims, but resources will be targeted toward claims that have not been reviewed for the longest to bring the income held up to date, again with the intention of reducing the level of impact when the household moves on to Universal Credit and the new Council Tax Support scheme.
- The scheme parameters will be reviewed annually with a view to uprate if appropriate to ensure the scheme continues to offer a similar level of support to low income residents
- For households who are already in receipt of Universal Credit and Council Tax Support as at 31st March 2020 and who lose more than 10% of their current entitlement, a level of transitional protection will be awarded for the first year of the new scheme. 50% of the loss will be awarded to give households time to adjust their budgeting in anticipation of the further reduction in 2021. The number of households meeting this criteria will reduce if the amendments to the proposals are made as the scheme is more generous.
- The proposal to use the Universal Credit notification sent to the Council by the Department for Work and Pensions will increase the number of working age people in the borough who claim Council Tax Support. This will help to ensure residents receive the support they are entitled to at the earliest point.
- The Council already has in place a Recovery Policy to ensure consideration is given to vulnerable households when collecting monies owed to the Council. This policy will be reviewed to consider what impact the proposed changes to the Council Tax Support scheme may have on recovery and potentially vulnerable households.
- In exceptional cases, consideration will be given to exercising the Council's discretion under s13A(1)(c). Funding from the additional £400,000 allocated to the scheme that is not spent due to the full caseload not yet having transitioned onto Universal Credit will be allocated to s13A(1)(c)

The feedback from the consultation will be used to inform the decision of whether to implement the proposed changes to the Council Tax Support scheme and to identify any alternatives to the scheme and mitigations to assist any households negatively impacted by a new scheme.

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>Harrow profile</p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18 sets out that of a population of 248,750:</p> <ul style="list-style-type: none"> • 20.6% of the population are aged 0 – 15 • 64.2% are working age • 15.2% were aged 65 and over <p>Research shows that number of children living in workless households in the borough is reducing. While this may mean that some will not be in receipt of benefits, those that are will be more likely to be impacted by these proposals</p> <p>Council Tax Support profile by household type</p> <ul style="list-style-type: none"> • Harrow has 11,695 Council Tax Support claims. • 42.51% (4,971) are pensioners • 57.49% (6,724) are working age • 59.07% (3,972) of the working age households have children aged 0 - 18 <p>The table below shows the split of the working age caseload by the age of</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

the claimant. Over 65s are either due to mixed age couples who are classified as working age under Council Tax Support legislation or people aged 66 or 67 who are still classed as working age

Age of claimant	% of working age total	Number of households
Total working age		6698
18-24 years old	2%	142
25-34 years old	14%	932
35-44 years old	29%	1968
45-54 years old	30%	2040
55-64 years old	23%	1554
Over 65 years old	1%	62

Impact of proposed changes

The negative impact of the proposals for households with the Age characteristic has been classified as minor. As shown in the table below, for the majority of Council Tax Support claimants this is expected to be the case. However, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (354 will lose £5-£10 a week and 89 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.

The proposals will only affect working age claimants as the pensioner

scheme is set by the Ministry of Housing, Communities and Local Government and cannot be changed locally. 3,764 (56%) of the 6,698 working age claimants will see no change to their entitlement.

All households will be affected differently by the proposals. The average impact on all working age households is set out in the table below:

Impact on entitlement. Weekly	Number of households impacted	% of households impacted
Total working age	6698	
No change	3764	56.2%
Gain up to £1	115	1.7%
Gain £1 - £5	428	6.4%
Gain £5 - £10	470	7.0%
Gain £10 - £15	214	3.2%
Gain £15 - £20	47	0.7%
Gain over £20	27	0.4%
Total gain	1301	19.4%
Loss £1 or under	265	4.0%
Loss £1 - £5	925	13.8%
Loss £5 - £10	354	5.3%
Loss £10 - £15	66	1.0%
Loss £15 - £20	15	0.2%
Loss over £20	8	0.1%
Total loss	1633	24.4%

	<p>The majority, 17.8% (1,190), who lose will see less than a £5 a week change to their entitlement. 5.3% (354) will lose £5 - £10 and 1.3% (89) will lose more than £10 a week.</p> <p>The 35 – 44 age groups are slightly more likely to see a reduction to their Council Tax Support entitlement than across the working age caseload as a whole (31% compared to 24%)</p> <p>The 35 – 44 age group is more likely to be negatively impacted because there are more households in this group who are:</p> <ul style="list-style-type: none"> • in-work – working households are most likely to see a change to their entitlement as a result of these proposals; • less likely to be disabled – disabled households are most likely to see no change or a beneficial change • There are slightly more households with 5 or more children (8% compared to 4% of the total caseload). These groups are more likely to lose under the proposed changes <p>Of all households who gain, 8.1% (543) will see less than a £5 a week change to their entitlement. 7% (470) will gain £5 - £10 a week and 4.3% (288) will gain more than £10.</p> <p>18 – 24, 55 – 64 and those aged over 65 years are less likely to gain (14%, 12% and 13% respectively compared to 19% of the total caseload)</p> <p>25 – 34, 35 – 44 and 45 – 54 groups will see similar levels of gain to the caseload as a whole.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes</p>				
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	<p>to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Households with children</u></p> <p>Of the 6,698 working age households, 3,971 (59.3%) have children. Recognising that this is based on households with children up to the age of 18, while the borough data is based on population up to the age of 16, there are proportionately more households with children in receipt of Council Tax Support than there are in the borough (20.62% of population aged 0 – 16). Any changes to entitlement are therefore going to disproportionately impact on households with children.</p> <p>As a whole, households with children are more likely to see a reduction in their entitlement compared to the caseload as a whole (31% compared to 24% respectively).</p> <p>The level of loss for households with children is also more likely to be greater, with 9.9% (394) households losing more than £5 a week compared to 6.6% (443) in the working age caseload as a whole. This means that 88.9% of all households who will lose more than £5 are households with children. 310 of these households with children will lose £5 - £10 a week and 84 will lose more than £10 a week</p> <p>Households with 3 or more children are more likely to lose over £5 than households with 1 or 2 children (15.7% and 5.7% respectively). 29.3% of households with 5 or more children will lose more than £5 a week. 63 will lose £5 - £10 and 19 will lose over £5.</p> <p>The reasons households with more children will lose more is because:</p> <ul style="list-style-type: none"> • They are more likely to be in work (56%) than the caseload as a whole • There are proportionately more households with children in receipt of Council Tax Support than there are in the borough as a whole • A number of households with children are not claiming all of the tax 				
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	<p>credits they are entitled to</p> <ul style="list-style-type: none"> • Larger families will lose out due to the removal of the means test so there is no additional benefit awarded to account for the extra cost of having more children • Households paying more child care costs will lose more Council Tax Support under these proposals • Proportionately less households with children are disabled than in the caseload as a whole. Disabled groups are less likely to be detrimentally impacted by these proposals <p>More households with children are likely to gain as a result of these proposals compared to the caseload as a whole (26% and 19% respectively)</p> <p>Households with 3 or 4 children are most likely to gain, 29% (404). While households with 5 or more children are least likely to gain, 13% (35).</p> <p>15.1% (600) of households with children will gain more than £5 a week compared to 11.3% of the caseload as a whole. This higher level of gain is spread across all households with children except those with 5 or more children where 5.7% (16) households will gain more than £5 a week.</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are proportionately more working age claims and claims from households with children for Council Tax Support than the borough population,</p>				
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	<p>these groups will benefit from this proposal.</p> <p>Pensioners cannot claim Universal Credit and the pensioner scheme is legislated for by Ministry of Housing, Communities and Local Government. This proposal can therefore not be extended to pensioners claiming Council Tax Support.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>23 households in the current Council Tax Support caseload are forecast as not being able to qualify for Universal Credit and do not meet the exception criteria to be eligible for the proposed new Council Tax Support scheme. Of these, 12 are in the 55-64 age group. One has a child in the household.</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
<p>Disability</p>	<p>Harrow Profile</p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> • 13.7% of the working age population classify themselves as disabled • 2.6% of Harrow’s population receive Disability Living Allowance • 1,044 carers have been assessed or supported by the local authority 	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>during 2016-17. 36% of these were aged 65 or over</p> <ul style="list-style-type: none"> • Research shows that 10.6% of carers in Harrow reported that their caring responsibilities caused them a lot of financial hardship. This was an increase from 9.6% the previous year <p>Council Tax Support profile</p> <ul style="list-style-type: none"> • Of the 6,698 working age households who receive Council Tax Support in Harrow, 2,993 are classified as disabled under the scheme. For the purposes of Council Tax Support a household is classified as disabled if the following criteria are met: • Working Age Disabled and War Pension recipients (working age) – which consists of households where the customer, a partner or a dependent child is physically or mentally disabled and receives one of the following: Personal Independence Payments, Disability Living Allowance, Employment Support Allowance (Support group), Incapacity Benefit, Mobility Supplement, Severe Disablement Allowance; people who are registered blind; people who live in a property which has been granted a disabled band reduction; or anyone who is working age and receives War Disablement Pension or War Widows Pension. • Data is not held to show how many Council Tax Support households classify themselves as disabled outside of the above criteria. • 929 working age households where Carers Allowance is in payment receive Council Tax Support <p>Impact of proposed changes</p> <p>The majority of households classified as disabled under the scheme will experience no change as a result of the proposals, 88% (2,625). This is because most disabled households are already in receipt of maximum entitlement. They are also more likely to have non-dependant deductions</p>				
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	<p>disregarded if they are in receipt of certain disability benefits.</p> <p>8% (247) will gain which is proportionately less than across the working age scheme as a whole, but this group generally receive a higher rate at 86% rather than 70% already.</p> <p>The number who will see a reduction to their Council Tax Support is less than the total caseload at 4% (121) compared to 24%. All who lose are impacted by the proposals to change non-dependant deductions, not the introduction of a banded scheme. This proposal is expected to be borne by the non-dependants and will therefore be spread at a lower level across each individual. The claimant and partner will however remain liable for the Council Tax should the non-dependants not contribute as expected.</p> <p>The amount disabled households will lose is less than the caseload as a whole, with 0.3% (10) losing over £5 compared to 1.6%. None will lose more than £15 a week.</p> <p>All working age households where the claimant or partner are in work (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme. While there are fewer disabled households where the claimant or partner are in work (under 200), they will still benefit from this proposal.</p> <p>The proposal to make further changes to the non-dependant deductions reduces the above impact further. 38 disabled households are forecast to lose following this change, with 3 losing £1 - £5, 28 losing 5 - £10, 5 losing £10 - £15 and 2 losing over £20.</p> <p><u>Carers</u></p> <p>Households in receipt of Carers Allowance are also less likely to see a change</p>				
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	<p>to their entitlement: 71% (658) will see no change compared to 56% of the total caseload.</p> <p>The proportion of those with Carers Allowance who will gain is similar to that of the wider caseload</p> <p>The proportion of those who lose is less than the wider caseload 14% (126) compared to 24%. 15 households where the claimant or partner receive Carers Allowance will lose £5 a week or more.</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are a proportionately high number of disabled households and households where Carers Allowance is received, who are claiming Council Tax Support, this group will benefit from this proposal.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>The proposal to also include contribution based Employment Support Allowance as an eligibility benefit will assist in helping the majority of people in receipt of this benefit continue to have the opportunity to be assessed for Council Tax Support.</p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. 16 of these households are classified as vulnerable and 7 are in receipt of Carers Allowance (6 are in both of these categories).</p>				
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	<p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
<p>Gender reassignment</p>	<ul style="list-style-type: none"> This information is not available within Harrow profiling or the Council Tax Support caseload 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Marriage and Civil Partnership</p>	<p>Harrow Profile</p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> 54% of Harrow residents are married As at 31st December 2016 there have been 142 Civil Partnerships, 19 of which have been converted to marriage There have been 32 same sex marriages in Harrow since inception on 29th March 2014 <p>Council Tax Support profile</p> <p>2,535 households in the working age Council Tax Support caseload are couples.</p> <p>Data is either not held or cannot be extracted to identify whether Council Tax Support customers are married, if they are in same sex marriages or in Civil Partnerships</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>Impact of proposed changes</p> <p><i>The negative impact of the proposals for households in this characteristic has been classified as minor. For the majority of Council Tax Support claimants who are couples this is expected to be the case. However, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (329 will lose £5-£10 a week and 73 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></p> <p>The impacts experienced by couples are similar to those of households with children as 85% of couples have children. The level of impact will depend on how many children the couple have. See the 'Age' characteristic for more information.</p> <p>Couples are also more likely to work so are therefore more likely to see change to their entitlement (62% of couples work compared to 39% of the caseload as a whole). See the 'Age' characteristic for more information on the impacts of being in work.</p> <p>32% (801) of couples will see a reduction to their entitlement as a result of these proposals compared to 24% of the total caseload. 13% (329) will lose more than £5 compared to 6.6% of the total caseload. 256 will lose £5 - £10 a week and 73 will lose over £10</p> <p>31% (777) will gain compared to 19% of the total caseload. 17.9% (454) will gain over £5 a week compared to 11.3% of the total caseload. 261 will gain £5 - £10 a week and 193 will gain over £10.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested</p>				
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	<p>scheme</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. 9 of these households are couples</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p>People in receipt of contribution based Job Seekers Allowance or Employment Support Allowance who do not receive Universal Credit, will still be able to access the Council Tax Support scheme due to the exception to the Universal Credit eligibility rule for this group.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
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Pregnancy and Maternity	Council Tax Support data is not available for this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race/ Ethnicity	<p>Harrow profile</p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> • 61.8% of Harrow residents classify themselves as belonging to a minority ethnic group <p>2011 census data:</p> <ul style="list-style-type: none"> • 8.2% Black or Black British • 4% Mixed race • 12% Other Asian or Asian British • 1.5% Other ethnic group • 30.2% South Asian or South Asian British • 34% White British or Irish • 8.2% White Other <p>Research shows that Harrow’s BAME population rate is growing, most notably in White Other (Romanian)</p> <p>Council Tax Support caseload</p> <p>Ethnicity data is held for 34% (2,269) of the Council Tax Support working age</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>caseload. The monitoring data is completed by the applicant so gives information relating to the claimant which could differ from other household members. While this means a complete picture is not available, it gives an indication of any ethnic group that may be disproportionately impacted by the proposals. Analysis of the impacts on the 34% where Race data is held reflects the impacts on the caseload as a whole which indicates that the data is more reliable than not.</p> <p>Furthermore it should be noted that the Harrow data is based on population while the Council Tax Support data is based on households. If any ethnic group is more likely to have larger or smaller number of members in the household, this could influence the data</p> <ul style="list-style-type: none"> • 69% classify themselves as being from an ethnic minority group • 16.6% Black or Black British • 3.7% Mixed race • 27.6% Other Asian or Asian British • 2.4% Other ethnic group • 14.3% South Asian or South Asian British • 31% White British or Irish • 4.2% White Other <p>There are proportionately more claims from households in the Black or Black British and Other Asian or Asian British groups. This means these groups are disproportionately likely to be impacted by these proposals.</p>				
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	<p>South Asian or South Asian British and White Other households are less likely to be in receipt of Council Tax Support than compared to the number in the population. This means they are disproportionately less likely to be impacted by these proposals. The main ethnic group within South Asian or South Asian British is Indian at 26.4% of the population and 7.6% of the Council Tax Support caseload.</p> <p>Impacts of the proposals</p> <p><i>The negative impact of the proposals for households with the Race characteristic has been classified as minor. For the majority of Council Tax Support claimants this is expected to be the case, however as stated in other characteristics there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (90 households classified as an ethnic minority will lose £5-£10 a week and 14 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></p> <p>Below sets out where any ethnic group is disproportionately impacted compared to the caseload as a whole. Total caseload data is:</p> <ul style="list-style-type: none"> • 24% lose • 19% gain • 56% will see no change <p>Black or Black British (377) are less likely to gain 14% (54) but are also less likely to lose 25% (95). This is because disproportionately more households with this characteristic are not in work and therefore more likely to see no change to their Council Tax Support as a result of these proposals</p>				
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	<p>Mixed race (85) are less likely to gain 11% (9), less likely to lose 14% (12) and more likely to see no change 75% (64). This is because disproportionately more households with this characteristic are not in work and therefore more likely to see no change to their Council Tax Support as a result of these proposals</p> <p>Other Asian or Asian British (626) are more likely to lose 31% (191), more likely to gain 31% (193) and less likely to see no change 39% (242). This is because these households are more likely to be in-work and therefore more likely to be affected by the proposals.</p> <p>White British or Irish (706) are less likely to lose 19% (132), less likely to gain 12% (88) and more likely to see no change 69% (486). This group are less likely to see any change because they are more likely to be out of work.</p> <p>White other (95) are more likely to lose 31% (30), more likely to gain 34% (33) and less likely to see no change 34% (33). This is because these households are more likely to be in-work and therefore more likely to be affected by the proposals.</p> <p>No Race characteristic is identified as being disproportionately impacted by having more children compared to the total caseload</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing</p>				
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	<p>the barriers to claim.</p> <p>As there are proportionately more Black or Black British and Other Asian or Asian British groups claims, these groups will benefit from this proposal.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. Race monitoring data is held for 7 of these households: 3 are Asian or Asian British Indian, 3 are White British and 1 is Asian or Asian British Pakistani.</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p>People in receipt of contribution based Job Seekers Allowance or Employment Support Allowance who do not receive Universal Credit, will still be able to access the Council Tax Support scheme due to the exception to the Universal Credit eligibility rule for this group.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
	Religion or belief		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Council Tax Support data is not available for this characteristic				
Sex	<p>Harrow Profile</p> <ul style="list-style-type: none"> • Our Harrow, Our Community – Equality Profile data report 2017/18: • 49.9% of Harrow’s population are male • 51.1% are female <p>Harrow’s vitality profile 2011/13 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.</p> <p>Council Tax Support profile</p> <ul style="list-style-type: none"> • Couples account for 38% (2,535) of the Council Tax Support working age caseload. It is not possible to state how many of these are mixed sex and how many are same sex. • There are 3,957 where there is no partner and the sex of the claimant is known. 73% (2,888) are female and 27% (1,069) are male • 26% (1,754) of working age Council Tax Support households are lone parents • 94% (1657) of lone parents are female and 6% (97) are male • 56% (1,231) of single people with no children in their benefit household are female and 44% (972) are male <p>Data is either not held or cannot be extracted to identify whether Council Tax Support customers are married, if they are in same sex marriages or in Civil</p>	☒	☒	☐	☐

	<p>Partnerships</p> <p>Impact of the proposed changes</p> <p><i>The negative impact against the sex characteristic has been classified as minor. This is because for the majority of households the impact will either be positive, no impact or a minor negative impact. However,, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (13 single male claimants will lose £5-£10 a week and none will lose over £10 a week. 83 single female households will lose £5 - £10 a week and 15 will lose over £10). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></p> <p>Analysis of the impacts for people who are not in a couple (lone parents and single people without children) shows that men are most likely to see no change to their Council Tax Support (80% compared to 56% of the caseload as a whole).</p> <p>Male lone parents are more likely to see a reduction in their entitlement (34% compared to 24% of the total caseload) and less likely to see an increase (11% compared to 19%). There are 97 lone parent households where the claimant is male. The majority who lose will lose under £5 a week (27) with 6 households forecast to lose £5 - £10 and none over this rate</p> <p>Female lone parents are not disproportionately impacted compared to the caseload as a whole, but there are a proportionately high number of lone parents in receipt of Council Tax Support (27% of the caseload are lone parents compared to 6.6% in the borough) and most of these are women</p> <p>All single people without children are less likely to see a loss or gain with men most likely to see no change at 83% compared to 56% of the total caseload.</p>				
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	<p>73% of single women without children will see no change. This is because most of this group are out of work and a high proportion are disabled (around 68% of men and women are disabled and single without children compared to 45% of the total caseload)</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are proportionately more female claimants than male, females are more likely to benefit from this proposal</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. The sex of the claimant is known on 13 of these households: 3 are male and 10 female. All are single with no children.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31st March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future</p>				
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	changes they may experience (up to maximum liability).				
Sexual Orientation	Council Tax Support data is not available for this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?

Yes No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?

Yes No

If you clicked the Yes box, Include details in the space below

Large families are most likely to lose a higher amount of Council Tax Support as a result of these proposals. Other changes to the benefit system will also negatively impact this group, for example the two child limit in many benefits and the Benefit Cap being applied to all benefit income when a household moves onto Universal Credit and not just the housing costs.

The change to Council Tax Support will come at the same time as a household moves on to Universal Credit. These multiple changes could make it harder for the household to budget initially. Publicity of the Council Tax Support changes is expected to help this situation. Furthermore, reducing the number of changes to a household's Council Tax Support entitlement as their earnings change should assist with giving some stability after this initial change.

Following Government's announcement to allow local authorities to continue to increase council tax to fund social care, it is very likely that there will

be ongoing annual increases in council tax charges which residents, including those with a low income and in receipt of Council Tax Support, will be asked to pay.

Under Brexit and the uncertainty surrounding our status in Europe, there may be unforeseen impacts which we have not been able to quantify

The Birmingham University Financial Inclusion Monitor 2019 finds that being in work is not a way out of poverty, with more than 8 million people who were living in poverty in 2016/17 having at least one paid worker in their family. Furthermore means-tested benefits for people out of work are not sufficient for people to live on e.g. in 2009 a lone parent with one child received two thirds of what she needed. Ten years later, she received less than half. For those households who will receive less Council Tax Support as a result of these proposals, if they are already struggling to manage their finances the revised scheme could create further financial hardship <https://www.birmingham.ac.uk/research/chasm/financial-inclusion/3-poverty.aspx>

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
All working age households	The proposed new scheme will monitor caseload volumes and expenditure of the scheme on a monthly basis to identify any unexpected changes in claim numbers or spend. As claimants transfer onto Universal	Monthly data to be shared with Portfolio Holder along with indepth data if it identifies that there have been unforeseen impacts or that impacts are greater than anticipated	Monthly	Fern Silverio

	Credit and the number of people claiming Council Tax Support from the new scheme grows, more detailed reviews will be carried out to identify any unforeseen impacts		Annual	
<p>All working age households to reduce the impact of losing entitlement compared to the current scheme and the level of potential loss. Particularly targeted to mitigate the impacts for families, notably larger families. The impact on this group had knock on impacts across other protected characteristics.</p> <p>Proposed scheme has been amended as set out in section 1c above to incorporate additional expenditure of £400,000 either directly in to scheme spend or in a hardship fund while households transition onto Universal Credit and therefore the new Council Tax Support scheme.</p> <p>There are still losses identified across different groups as set out</p>	<ul style="list-style-type: none"> • Include additional categories for households with 3 or more children • Make the minimum award 70% across all non-vulnerable groups • Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement • Implement two non-dependant deductions in place of the proposed one at rates that support low income part time workers • Use net earned income instead of gross 	<p>Scheme to be monitored to understand caseload impacts and level of loss</p>	<p>To be implemented by 1/4/20</p>	<p>Fern Silverio</p>

<p>above. This approach carries risk to scheme expenditure as it will open up the scheme to some residents who can not currently qualify.</p>				
<p>Working age households who will see a reduction to their Council Tax Support as a result of the proposals</p>	<p>A publicity campaign will be carried out to inform people how their Council Tax Support entitlement could change in advance of them moving onto the new scheme. The campaign will set out the new scheme in simple terms to ensure residents are able to understand how it works.</p>	<p>Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.</p> <p>Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.</p>	<p>March 2020 and periodically depending on the rollout schedule for Universal Credit in Harrow</p>	<p>Fern Silverio</p>
<p>Working age households who will see a reduction to their Council Tax Support as a result of the proposals</p>	<p>The Council will write to people who are expected to lose out under the new scheme to advise them of the change in advance to help them to start to budget accordingly and to access support if required.</p>	<p>Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.</p> <p>Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are</p>	<p>March 2020 and periodically depending on the rollout schedule for Universal Credit in Harrow</p>	<p>Fern Silverio</p>

		responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	An online calculator is available for Harrow's bespoke Council Tax Support scheme. This enables residents to see how much Council Tax Support they will be entitled to. A Universal Credit 'better-buy' calculator is also available through the Harrow website which informs residents of whether they will be better off on Universal Credit and what benefits they could be entitled to.	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes. Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.	March 2020	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	Anyone identified as not receiving the full benefits they are entitled to will be written to and advised of this. They will either be able to claim additional tax credits to reflect their true circumstances, or, if they don't currently receive any tax credits, then they will be informed that if they claim Universal Credit that their income could increase.	Level of change when the new scheme is implemented. Potential to carry out further publicity if low take up	31/3/20	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the	A review of earned income claims will be carried out to ensure the correct amount of earnings is held on the Council Tax Support claim. This will reduce the	Monitor number of in-work claims reviewed	Quarterly	Fern Silverio

proposals	impact of change when the household moves onto Universal Credit. Due to the volume of claims and resources required, it is not possible to review all self-employed claims, but resources will be targeted toward claims that have not been reviewed for the longest to bring the income held up to date, again with the intention of reducing the level of impact when the household moves on to Universal Credit and the new Council Tax Support scheme.			
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The scheme parameters will be reviewed annually with a view to uprate if appropriate to ensure the scheme continues to offer a similar level of support to low income residents	Monitor the average level of support, liaise with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme and monitor collection rates to understand whether the scheme is providing the appropriate level of assistance	Annually	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	For households who are already in receipt of Universal Credit and Council Tax Support as at 31 st March 2020 and who lose more than 10% of their current	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are	31/3/20	Fern Silverio

	entitlement, a level of transitional protection will be awarded for the first year of the new scheme. 50% of the loss will be awarded to give households time to adjust their budgeting in anticipation of the further reduction in 2021.	managing the changes. Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The proposal to use the Universal Credit notification sent to the Council by the Department for Work and Pensions will increase the number of working age people in the borough who claim Council Tax Support. This will help to ensure residents receive the support they are entitled to at the earliest point.	Monitor Council Tax Support caseload volumes as Universal Credit rolls out	1/4/20	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The Council already has in place a Vulnerability Policy to ensure consideration is given to vulnerable households when collecting monies owed to the Council. This policy will be reviewed as part of the Recovery Policy to consider what impact the proposed changes to the Council Tax Support scheme may have on recovery and potentially vulnerable households	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes. Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are	31/3/21	Fern Silverio

		responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	<p>In exceptional cases, consideration will be given to exercising the Council's discretion under s13A(1)(c). Policy to be reviewed</p> <p>Funding to be allocated to this hardship scheme from the additional £400,000 while the numbers claiming on the new scheme are lower and therefore not spending the new allocation in full.</p>	Monitor expenditure under s13A(1)(c) and reasons for awards	30/6/20	Fern Silverio

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

Include details in the space below

By accepting the Universal Credit notification as a claim for Council Tax Support, all low income working age groups in the borough who claim Universal Credit will also be assessed for Council Tax Support. This reduces barriers to groups who may otherwise have been less likely to claim e.g. because of language barriers. This will be further advanced by simplifying the scheme, making it easier for residents to understand how much they can receive and how their entitlement has been calculated.

The proposals are most likely to positively impact households classified as disabled under the scheme who are in-work, incentivising disabled households in to work if viable for them. The level of entitlement for an in-work disabled household will be the same as a disabled household where the claimant or their partner are not in work.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

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

Outcome 2

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

Outcome 3

This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here

Appendix

Appendix 1 Consultation booklet

Appendix 2 Consultation questionnaire

Appendix 3 Equality Impact Assessment charts – CTS scheme consulted on

Appendix 4 Equality Impact Assessment charts – revised version of proposed scheme post consultation

Appendix 5 Consultation feedback report