

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 checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state) | |
| Title of Proposal | Permission to consult on changes to Council Tax Support scheme | Date EqIA created: 25/06/2024 |
| Name and job title of completing/lead Officer | Jenny Townsley, Benefits Service Manager | |
| Directorate/ Service responsible | Resources/Finance/Collections & Benefits/Benefits | |
| Organisational approval | | |
| EqIA approved by the EDI Team: | Name: | Signature <input type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval: |

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?

Proposal is to obtain permission to consult on changes to the Council's working age Council Tax Support (CTS) scheme. Legislation requires the Council to annually review its scheme to decide whether or not to make changes. It is proposed to make changes to the non-vulnerable working age CTS caseload and non-dependants in vulnerable households.

Harrow is currently facing extreme financial pressures, and CTS for working age claimants is a discretionary scheme. As such, following consideration of a variety of savings proposals, the Council proposes to consult on options to reduce the scheme's expenditure by £1.5m a year from 1/4/2025. Due to 20% of savings being passed onto preceptors, this would result in a saving of between £1.3m for the Council.

This EqIA is to support the Cabinet report which asks for authority to consult on proposals to make changes to the CTS scheme that would enable these savings to be achieved. It is based on one potential option and reviewed impacts of what is known pre consultation, but it should be noted that different options could have a different impact and the level of impact will be investigated as part of the consultation. It is important to note that while the EQIA seeks to identify potential impacts for households affected by these proposals, the Cabinet report is only seeking permission to consult at this stage and is not approving any changes to the CTS scheme.

Impacts are assessed on forecasted impacts on the basis of current data. The Council currently has two working age CTS schemes: one for people in receipt of Universal Credit and one for those not on Universal Credit. Due to the migration to Universal Credit that is taking place between April 2024 and December 2025, the majority of households will have moved onto Universal Credit by the time any changes to the CTS scheme are implemented, and all but an estimated 141 will have migrated by December 2025. The value of impacts therefore focuses on people who are in receipt of Universal Credit and estimates these impacts for the caseload as a whole, on the basis of the almost 5,800 households out of a total working age of 8,218 that have already migrated.

Of the 141, their full income details are not always known so it is not possible to compare the impact for these non-UC households to those on the UC CTS scheme. Some are also expected to still migrate onto UC even though their current income indicates they may not be entitled at present. However, consideration has been given to whether any households remaining on

the non-UC scheme would be detrimentally impacted to a greater extent than those on the UC scheme, and it has been found that where data is held, this is unlikely.

Of those currently not on Universal Credit but expected to migrate by December 2025, consideration has been given to whether there are any groups that may see a notably different level of impact than the average for those who have already migrated. As 83% of the non-vulnerable caseload have already migrated, the level of change to the average loss following the full migration is expected to be fairly minimal. There are however two groups where there is a higher level of loss and there are disproportionately more remaining in the non-migrated group than migrated: households with 3 or more children and households in Band E or higher. This will be monitored and new data analysis undertaken as part of the post consultation decision making process.

The Council does not hold full data in respect to all of the protected characteristics for households in receipt of CTS. The consultation will therefore also ask stakeholders what they believe the potential impacts of proposed changes will be, with particular focus on those characteristics where data is not available. It is intended to work with the Voluntary and Community Sector in advance of the consultation starting to understand who these groups might be to ensure the consultation specifically reaches out to those households to capture their views. This information along with updated caseload data post consultation will be reviewed as part of the EqIA to support the Cabinet report if a decision to change the CTS scheme is to be taken to Cabinet and then on to Council for approval.

State pension age only households are covered by a prescribed national scheme and are therefore not included as part of this proposal. It will only be working age claim households who are impacted, although these households may have pensioners living in them either as non-dependants or as mixed age couples.

Harrow's currently Council Tax Support scheme for working age households awards a reduction to the council tax charge for low income households in the borough up to the maximum of 86% for vulnerable households and 70% for other working age households.

A working age household is classified as vulnerable under the Council Tax Support scheme if the claimant, partner or a dependent child are receiving:

- Disability Living Allowance (any component); or
- Employment Support Allowance (Support group); or
- Incapacity Benefit; or

- Mobility Supplement; or
- Severe Disablement Allowance; or
- Personal Independence Payment or Armed Forces Independence Payment (AFIP); or
- Has an invalid vehicle supplied by the National Health Service or gets Department of Work and Pensions payments for car running costs; or
- A disability banding reduction has been granted for the property; or
- You or your partner are registered blind; or
- Receive a War Pension

If the claimant or partner combined earned/self-employed net income is less than £440 a week they will be passported to an award of 86% less any non-dependant deductions.

Non-vulnerable households are also assessed based on the earned income of the claimant and partner, and then awarded an amount depending on the income bracket they are in. Appendix A gives more detail on the scheme and income brackets.

The proposed changes to the scheme are set out in Appendix B, but in summary are:

- Vulnerable
 - Increase non-dependant deductions by Retail Price Index (RPI) annually since they were last reviewed in 2020 and annually thereafter by whichever is higher of RPI or Consumer Price Index (CPI)
- Non-vulnerable
 - Lower the maximum award threshold from 70% to 50%
 - Reduce subsequent income bands to reflect rate of reduction in maximum award
 - Cap the maximum rate of council tax used in the CTS assessment at Band D
 - Increase non-dependant deductions by RPI annually since they were last reviewed in 2020 and annually thereafter by whichever is higher of RPI or CPI

This proposal would achieve £1.7m savings gross, which equates to £1.3m for the Council once the preceptor is paid

To ensure all potentially impacted groups are able to give their views on the changes including potential impacts, it is proposed to carry out a detailed consultation which intends to include activity such as the following:

- Engagement with Voluntary and Community Sector (VCS) and faith groups both to capture views on scheme options but also to assist in ensuring all potentially impacted households are aware of and can access the consultation
- Open days for public to attend at accessible venues
- MyHarrow Talk consultation survey
- Mailshot to all impacted households
- Publicity through Harrow online, Council newsletters and social media
- Easy Read document (including translated versions)
- Information videos

VCS engagement is expected to include a pre-consultation meeting with VCS groups to ensure they are able to assist the consultation in accessing all impacted groups and for organisations to support the consultation as well as providing their own responses to the proposals. This engagement will assist in identifying the protected characteristics where the Council does not hold data currently and ensuring additional activity is undertaken in the consultation to engage with these groups.

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

In April 2024 when the CTS modelling data was extracted, the working age Council Tax Support (CTS) caseload was 8,218. 4,132 of these households are classified as non-vulnerable and 4,023 vulnerable. 472 of the vulnerable households have non-dependant deductions applied to them.

5,787 working age CTS households are currently in receipt of Universal Credit (UC) and therefore assessed under the CTS UC scheme. It is forecast that once the full UC migration has completed during 2025, there will be 141 households remaining on the non-UC scheme. The EqIA focuses on the caseload as a whole but the value of loss is based on current households in the UC scheme as this is the loss all except the estimated 141 will experience once they migrate to UC.

Of those currently not on UC but expected to migrate by December 2025, consideration has been given to whether there are any groups that may see a notably different level of impact than the average for those who have already migrated. The main impact of this is expected to be an increase to the overall average level of loss for the caseload as a whole, because of the proportion of households where the loss is forecast to be higher who have not yet migrated to UC. The key groups identified to date are:

- Households with 3 or more children

- Households in Band E or higher:

As these two groups are estimated to experience a higher level of loss than average, and the proportion of households that have migrated at the point the data was extracted was lower for these two groups, it is indicated that once the full migration is complete the overall average level of impact will be higher. The migration is not expected to have a large impact on the estimated level of loss for individual groups.

Data will be extracted again to feed into the post consultation decision making process. Consideration will be given to what proportion of the caseload has migrated at that point and whether there has been any impact on the estimated value of loss. 83% of the non-vulnerable caseload has migrated at the point the data was extracted so any changes are expected to be minimal.

Appendix C sets out some example scenarios of how households will be impacted by this proposal

Age

Only working age non-vulnerable CTS households and vulnerable households with non-dependant deductions will be affected. This equates to 4,377 households.

There are 6,794 children living in 3,008 (73% of all non-vulnerable) non-vulnerable CTS households. All of these households will lose some of their CTS. The average level of loss for households with children is £7.59 a week.

As the average level of loss for all non-vulnerable households is £7.49, households with children will lose slightly more than average.

Households with 3+ children are estimated to lose more than average at a rate of £8.28 a week. Larger families are more likely to have their benefits reduced for other reasons such as the 2 child cap or Benefit cap, meaning they have relatively less income than other households proportionate to their size. There are 1,058 CTS non-vulnerable households with 3 or more children (35% of all non-vulnerable households with children)

Households in Band E or above are estimated to lose more on average than those in lower bands. The average level of loss for those in Band D or below is £6.55. There are 704 or 17% of non-vulnerable households in Band E or higher who will lose an estimated £13.05 a week.

73% of non-vulnerable households have children but 82% of households in Band E or higher have children indicating that households with children are slightly more likely to be impacted by this proposal. Households with children in Band E or higher (575 households) are estimated to lose slightly less than average for Band E at £12.71 a week. There are proportionately more households with 3 or more

children in Band E or higher properties than in non-vulnerable households as a whole, indicating that this group are more likely to be impacted by the proposal to cap at Band D. This may be because these properties are likely to have more bedrooms.

125 vulnerable households who will see the level of the non-dependant deductions increase have children. The average level of loss for this group is £4.25 a week which is slightly below average for all vulnerable with non-dependant deductions.

Pension Age

The 4635 Pension Age Council Tax Support claims will not be impacted by these proposals.

It is estimated there are 47 mixed age couples in receipt of Council Tax Support where either the claimant or partner are pension age and classified as non-vulnerable. Once the working age member of the couple reaches pension age, the claim will move into the pension age scheme and be assessed against 100%.

717 households have non-dependant deductions applied which will increase as a result of these proposals. It is estimated that there are 991 non-dependants. It is not known how many of these are of pension age, however the majority of pension age non-dependants are expected to be out of work and therefore have the lowest level of deduction applied. This means the impact would equate to £1.25 a week per non-dependant.

Disability

Of the 8,218 working age CTS households, 4,023 are classified as vulnerable under the scheme. The definition of vulnerable is set out in section 1(a) above.

The majority of vulnerable households will not be impacted by the proposals.

The only change to directly impact CTS vulnerable households is the increase to non-dependant deductions. There are 472 vulnerable households with 650 non-dependants in vulnerable households. The average level of loss for this group is £4.51 a week. This is higher than the estimated level of loss resulting from an increase to non-dependant deductions for the 245 non-vulnerable households containing 339 non-dependants who it is estimated would lose £3.37 a week as a result of this proposal.

The expectation is that the additional non-dependant charge is passed onto the non-dependants and not paid by the potentially vulnerable claimant or partner.

It is not known whether or not the non-dependant is vulnerable.

Where the claimant or partner are registered blind or claiming Disability Living Allowance care component (for Universal Credit it must be the middle or higher rate), Personal Independence Payment daily living component then a non-dependant deduction will not be taken.

Carers

It is not known how many people in CTS households would classify themselves as a carer. However, 407 of the non-vulnerable CTS households are in receipt of Carers Allowance. They are estimated to lose £8.52 a week which is above the average of £7.49 a week for all non-vulnerable CTS households.

Households in receipt of Carers Allowance in Band E or above (89 households) are estimated to lose £14.61 a week. This is above the average estimated loss for non-vulnerable CTS households in Band E or above properties at £13.05 a week.

22% of households in receipt of Carers Allowance are in Band E or above (89 households, 66 of which are in Band E and 23 in Band F or above). 17% of the non-vulnerable CTS households as a whole are in Band E or above. This means a household in receipt of Carers Allowance is more likely to be impacted by the proposal to cap at Band D, than other non-vulnerable CTS households.

164 households where Carers Allowance is in payment have non-dependant deductions and will experience loss to their CTS because of the uprating to the deductions. This is across the vulnerable and non-vulnerable households

Households in receipt of Carers Allowance may find it more difficult to find work to resolve their financial situation, because of their carer role.

Marriage and Civil Partnership

Of the 4,132 working age CTS non-vulnerable households, 1,460 (35%) are living together as a couple. It is not known whether they are married or in a civil partnership. They are estimated to lose more than average at £8.91 a week compared to all non-vulnerable at £7.49 a week.

23% (330 households) of couples live in properties at Band E or above compared to 17% of the non-vulnerable CTS caseload as a whole. This means couples are more likely to be impacted by the proposal to cap at Band D.

The estimated level of loss for couples in Band E and above is £13.98 a week compared to £13.05 a week for non-vulnerable in Band E as a whole. This indicates that couples are likely to lose more than single households.

It should be noted that couples are likely to receive proportionately more than equivalent single households. The value of loss may therefore be higher, but the proportion lost may not be.

Sex

Sex data is held for 33% of the caseload for claimants and partners and 23% of the non-vulnerable caseload. It is therefore not completely reliable and more information will need to be captured through the consultation. Given the low proportion of non-vulnerable households where this information is known, it is not possible to robustly evaluate the potential impacts for groups with this protected characteristic.

Data does however indicate that there is a higher proportion of lone parents who are female than male. 1,713 in total non-vulnerable are lone parents, 268 or 94% of those whose sex is known are female, 17 or 6%, are male. This indicates that female lone parents are more likely to be impacted than males. However, the level of impact for lone parents is estimated to be less than for all non-vulnerable households and less than all non-vulnerable households with children.

It should be noted that couples are likely to receive proportionately more than equivalent single households. The value of loss for lone parents may therefore be lower, but the proportion lost may not be.

Victims of domestic abuse will be impacted by these changes if they are in receipt of CTS. It is not always known who these CTS households are. The majority are believed to be female. The Council's Adult and Housing services will be engaged with, along with the VCS, to understand what the potential impacts may be for this group and how it can be ensured they feed in their views to the consultation. The consultation will engage with the Council's Domestic Abuse services to capture views on what the impacts may be for this group.

Other matters that households may need to consider in addition to CTS changes:

Those who have not yet migrated to Universal Credit will need to adjust to managing a monthly budget paid in full to the claimant when they migrate over the next 18 months, while also potentially budgeting for an increase in the amount of council tax they pay.

Self-employed people may have a Minimum Income Floor applied to the income used in the Universal Credit calculation. This means DWP apply a higher rate of self-employed earnings than the claimant/partner may actually receive. It is this rate that is used in the CTS assessment. These households could be asked to pay more toward their council tax from an income that they potentially do not have.

Some of the households in Band E or higher properties will own the property and therefore have assets that they may be able to use to financially assist them. However, it is believed a large proportion of the CTS caseload will rent the property and therefore not have this asset. If the household lives in a higher council tax Band because of the need for a larger property, they may be unable to downsize to alleviate this additional financial pressure or if they did downsize, they may be overcrowded. Some of these properties are council properties or properties that the council has placed people in.

Non-dependant deductions have not been updated since 2020. During this period incomes have increased so the rate of deduction has not kept pace with relative incomes. The liable parties are expected to pass on the additional charge to the non-dependants in the household.

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

All 4,132 working age CTS non-vulnerable households and 472 vulnerable households with non-dependant deductions will be negatively impacted by the proposals. The average level of loss is estimated to be £7.49 and £4.51 a week respectively.

While some protected characteristics have been identified as seeing a higher level of impact than others, or a disproportionate impact due to the level of representation within the total caseload, more information is needed to inform the final decision on any changes to the scheme.

Additional data is required in respect to some protected characteristics and a greater understanding of what the impacts might mean for different groups.

It is therefore proposed to carry out an indepth consultation which seeks to engage with stakeholders impacted by the proposals. A Campaign Strategy will detail how the consultation will be carried out and identify stakeholders, but it will be key to engage with the Voluntary and Community sector at an early stage for their assistance in identifying who the affected groups may be and for additional support on how to reach these groups to capture their views.

All potentially impacted working age claim households will be written to inviting them to take part in the consultation. The consultation will be available online and in hard copy. Open days are proposed to give affected people opportunity to meet with officers to discuss how the changes might affect them and to share their views. Open days will be held in the parts of the borough where the number of working age households in receipt of CTS is higher to increase accessibility and to target groups with protected characteristics who are either known to be affected or thought to be affected. Information relating to areas with higher levels of income deprivation will also be fed into the decision of where to hold the open days

A pre-consultation meeting with the VCS will enable groups to start to be identified in advance of the consultation to ensure alternative methods of engaging these groups can be considered. This includes working with internal services to identify any groups who are more vulnerable or less likely to engage with the consultation such as Adult Services and Housing.

Publicity will be undertaken to raise awareness across all groups including a mailshot to all impacted households, posters in venues such as VCS venues, libraries, children centres, local media such as online newsletters, social media

An Easy Read version of the online consultation in MyHarrow Talk will be made available along with a hard copy version of the consultation document to ensure all stakeholders can feed in their views. Information videos will be developed and consideration given to language barriers to also attempt to breakdown and reduce any obstacles that people may have when attempting to engage with the consultation.

In addition to understanding impacts and views on the proposals, the consultation will also ask stakeholders for their feedback on potential mitigations to the impacts. The mitigations currently under considerations are:

- Phasing in the changes for those experiencing greatest losses over two years
- Implementing a hardship scheme of approx. £125k for 2025/26 for people struggling to pay their council tax as a result of the changes

- Allocating £25k to deliver welfare advice to assist those impacted by the changes to access financial advice

Data sources used to inform EqIA

LBH Council Tax Support caseload data 14/04/2024

LBH vitality profiles: Deprivation 2018-19 [Harrow vitality profiles: Deprivation](#)

Joint Strategic Needs Assessment Summary [Harrow Profiles 2021](#)

Census population data 2021 [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

Office for National Statistics (ONS) [Population estimates by marital status and living arrangements, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

Office for National Statistics (ONS) [Sex - Office for National Statistics \(ons.gov.uk\)](#)

| 2. Assessing impact | | | | | |
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| 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><u>LBH age profile:</u></p> <p>Council Tax households: 96,500</p> <p>Joint Strategic Needs Assessment (JSNA):</p> <p>Percentage of children under the age of 16 living in low income households 12.3% (2019). This compares to 19.3% in London and 17.1% in England.</p> <p>Census 2021:</p> <p>LBH total population 259,200</p> <p>18.5% (48,300) of population under 15 years</p> <p>66.2% (172,900) aged 15 to 64 years</p> <p>15.4% (40,200) aged 65 years and over</p> <p>Harrow vitality profile:</p> <p>Index of Multiple Deprivation (based on data from 2015 and 2016):</p> <p>Overall Index of Multiple Deprivation for Harrow is 7 based on 1 being most deprived and 10 being least deprived</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| | <p>LBH Income deprivation is decile 5 at national level. Indicators are that approximately 27,300 individuals in Harrow may be experiencing income deprivation.</p> <p>LBH ranking for income deprivation affecting children is improving: in 2019 ranked 199/317 boroughs compared to 140/326 in 2015 and 66/326 in 2010. However, the income score indicates that 12.3% of children in Harrow live in families experiencing income deprivation which equates to approximately 6,500 children. The LSOAs with higher rates of income deprivation are Wealdstone, Marlborough, Roxbourne and Harrow Weald. LSOAs are Lower Layer Super Output Areas which are small areas or neighbourhoods within the borough.</p> <p>LBH Employment decile 8 indicating lower level of deprivation in respect to employment</p> <p>Harrow's ranking for employment deprivation has improved since 2015 relative to other local authorities in England and other London Boroughs. LBH average score indicates that 6.7% of the working age population (18-64 year olds) are experiencing employment deprivation, equating to approximately 10,600 individuals</p> <p><u>CTS caseload age profile:</u></p> <p>Pension age claimants are not affected by the proposals</p> <p>All working age CTS households who are not classified as vulnerable will be impacted in addition to vulnerable households who have non-dependant deductions. This equates to 4,377 working age households (5% of all households in borough).</p> <p>Non-vulnerable working age households</p> <p>Total non-vulnerable working age CTS households: 4,132 (50% of all working age CTS households)</p> <p>Households with children: 3,008 (73% of non-vulnerable households)</p> <p>Total number of children in non-vulnerable working age CTS households: 6,794. For the purpose of CTS children are defined as a person who is classified as a dependant in a claim household, normally where child benefit is payable for them.</p> <p>The value of the amount of CTS loss given below is based on averages for the existing households who are on the Universal Credit (UC) CTS scheme. See the Impacts section 1b in respect to potential changes to the average level of loss for the caseload</p> | | | | |
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as a whole once the UC migration is complete. It is noted that the average level of loss across the caseload could increase once the UC migration completes

Average estimated loss for non-vulnerable working age CTS households 4,132: £7.49 a week

Average estimated loss for households with children 3,008: £7.59 a week

Average estimated loss for households with 1 or 2 children 1,950 (65% of all non-vulnerable households with children) : £7.30 a week

Average estimated loss for households with 3 or more children 1,058 (35% of all non-vulnerable households with children): £8.28 a week

Non-vulnerable households in Band E or above, 704 (17% of all non-vulnerable households): average estimated loss for these households is £13.05 a week.

Average estimated loss for non-vulnerable households in Band E or above with children, 575: £12.71 a week

The table below shows number of children in the non-vulnerable household by CT Band

| CT Band\ No. of children | A | B | C | D | E | F | G | H | Total |
|--------------------------------|----|-----|-----|-----|-----|----|----|---|-------|
| 0 | 50 | 190 | 454 | 301 | 101 | 15 | 13 | | 1124 |
| 1 | 20 | 93 | 432 | 304 | 93 | 28 | 7 | | 977 |
| 2 | 6 | 42 | 403 | 344 | 143 | 26 | 6 | 3 | 973 |
| 3 | | 19 | 190 | 271 | 117 | 28 | 4 | | 629 |
| 4 | | 5 | 67 | 124 | 57 | 6 | | | 259 |
| 5 | | 1 | 15 | 55 | 32 | 4 | 1 | | 108 |
| 6 | | | 6 | 23 | 10 | 3 | | | 42 |
| 7 | | | 1 | 6 | 2 | 1 | | | 10 |
| 8 | | | | 5 | 1 | 1 | | | 7 |

| | | | | | | | | | |
|--------------|-----------|------------|-------------|-------------|------------|------------|-----------|----------|-------------|
| 9 | | | | | | 1 | | | 1 |
| 10 | | | | 1 | | | | | 1 |
| 11 | | | | | 1 | | | | 1 |
| Total | 76 | 350 | 1568 | 1434 | 557 | 113 | 31 | 3 | 4132 |

The data indicates that while the majority of households with children are in Band D or lower, there are a relatively high number in Band E with 1 – 3 children. However, proportionately households with 1 – 2 children account for 65% of all households with children, but they account for 84% of those in properties at Band D or lower. This indicates that larger families (3+ children) will be more likely to be impacted by the cap at Band D.

Households with children are more likely to be in a property at Band E or higher and therefore more likely to be impacted by this proposal compared to the total non-vulnerable caseload

Mixed age couples: it is estimated there are 47 mixed age couples in receipt of Council Tax Support where either the claimant or partner are pension age and classified as non-vulnerable.

Vulnerable households

The only proposed change that is known to impact households who are classified as vulnerable is the uprating of non-dependant deductions. There are 245 vulnerable households with non-dependant deductions. The estimated average loss to these households is £4.51 a week.

125 of these households contain children for whom the average level of loss is slightly less than the total at £4.25 a week.

Households with non-dependants who are pension age pensioners:

There are 717 households where non-dependant deductions are applied. It is estimated there are 991 non-dependants. It is not known how many of these are of pension age, however the majority are expected to have the lowest level of deduction applied as they are least likely to be in remunerative work. This means the impact would equate to £1.25 a week per non-dependant

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| | <p>Impacts on households with children</p> <p>Relative to the proportion of households with children in the borough, a high percentage of the CTS working age caseload contains children. 6,500 children (under age 15) in Harrow are believed to live in families experiencing income deprivation, compared to 6,794 who are in households in receipt of Council Tax Support who will be impacted by the proposed changes (CTS child is defined as a dependant for whom child benefit is in payment for). Even with the difference in definition between the Census and CTS, it is apparent that children will be disproportionately impacted by these proposals due to the number of households with children who will be affected.</p> <p>56% of the CTS working age caseload include children. 49% of the non-vulnerable caseload contain children. This indicates that by protecting the vulnerable, the impact on households with children will be less than if the vulnerable were not protected.</p> <p>Households with 3 or more children, are estimated to lose more than households with 1 or 2 children.</p> <p>Non-vulnerable households with children will normally receive proportionately more CTS than an equivalent household without children. If both were to lose the same percentage, this would be a higher financial value to the household with children than the household without. Therefore where the value of loss indicates a greater loss for households with children, proportionately this may not be the case depending on the particular circumstances of the household.</p> <p>17% of the non-vulnerable CTS caseload live in a property with a CT valuation of Band E or higher compared to 14% of the non-vulnerable caseload with children which indicates households with children are proportionately less likely to be impacted by this proposal.</p> <p>There are proportionately slightly more households with 3 or more children in Band E or above (47%) than there are this size household in the CTS non-vulnerable caseload as a whole (35%). This indicates that larger families are more likely to be impacted by the proposal to cap at Band D than smaller families</p> <p>Larger families are also likely to have other benefits capped at the two child rate or are more likely to be Benefit capped so may have a proportionately lower income than households with 1 or 2 children.</p> | | | | |
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| | <p>Impacts on households with people of pension age</p> <p>As pension age claimants are not included in the proposed changes to the CTS scheme, the majority of pension age CTS claimants will not be impacted. However, mixed age couples where the claimant or partner is pension age while the other is working age, will be impacted. The modelling of the proposed changes indicates that this is a relatively small group of approx. 47 non-vulnerable CTS households.</p> <p>Once the working age person in a mixed age couple reaches pension age, the CTS claim will move into the pension age scheme and they will be assessed against a maximum rate of 100%. This impact is therefore only applicable to them for this time.</p> <p>Households with pension age non-dependants will have the upratings to the deductions applied in the same way as households with non-dependants who are not pension age. As pension age are more likely to have lower incomes than working age people who may have higher earnings, the non-dependant deduction is expected to be relatively low in most cases. All non-dependant deductions are being increased by the same percent, so proportionately those on the lower rate of deduction will see a lower impact.</p> <p>Other matters that households may need to consider in addition to CTS changes:</p> <p>Those who have not yet migrated to Universal Credit will need to adjust to managing a monthly budget paid in full to the claimant when they migrate over the next 18 months, while also potentially budgeting for an increase in the amount of council tax they pay.</p> <p>Self-employed people may have a Minimum Income Floor applied to the income used in the Universal Credit calculation. This means DWP apply a higher rate of self-employed earnings than the claimant/partner may actually receive. It is this rate that is used in the CTS assessment. These households could be asked to pay more toward their council tax from an income that they potentially do not have.</p> <p>Some of the households in Band E or higher properties will own the property and therefore have assets that they may be able to use to financially assist them. However, it is believed a large proportion of the CTS caseload will rent the property and therefore not have this asset. If the household lives in a higher council tax Band because of the need for a larger property, they may be unable to downsize to alleviate this additional financial pressure or if they did downsize, they may be overcrowded.</p> | | | | |
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| | - | | | | |
| Disability | <p><u>LBH disability profile:</u></p> <p>Council Tax households: 96,500</p> <p>Joint Strategic Needs Assessment (JSNA):</p> <p>15% of households in Harrow reported that their daily activities were limited by a long-term health problem or disability. This compares to 14% across London as a whole and 18% nationally</p> <p>Census 2021:</p> <p>LBH total population 259,200</p> <p>Harrow vitality profile:</p> <p>Index of Multiple Deprivation (based on data from 2015 and 2016):</p> <p>Overall Index of Multiple Deprivation for Harrow is 7 based on 1 being most deprived and 10 being least deprived</p> <p>LBH health and deprivation and disability is at decile 10.</p> <p>No LSOAs (Lower Layer Super Output Areas) in Harrow are in the the most deprived 30% in England but Greenhill and Wealdstone have the lowest highest levels of health deprivation</p> <p><u>CTS caseload disability profile:</u></p> <p>Of the 8,218 working age CTS households, 4,023 are classified as vulnerable under the scheme. The definition of vulnerable is set out in section 1(a) above. 472 of these households have non-dependant deductions applied to them</p> <p>It is not known which CTS households would classify themselves as disabled or having a long term health issue which affects their daily living, only those that are classified as vulnerable under the scheme. The consultation intends to capture the impacts that people who classify themselves as disabled may experience from these proposals.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| | <p>Vulnerable households can currently receive up to 86% of their council tax in CTS. The only change to affect this group is the increase to the non-dependant deductions. As the deductions are expected to be passed on to the non-dependant to pay, the vulnerable claimant or partner should not be impacted.</p> <p>It is not known whether the non-dependants would be classified as vulnerable.</p> <p>Households classified as vulnerable are likely to lose more than households who are not vulnerable:</p> <p>Average estimated loss for vulnerable households due to non-dependant deduction changes: 472 households with an estimated reduction of £4.51 a week. This relates to 650 non-dependants across the 472 households. This compares to the 245 households (339 non-dependants) in non-vulnerable households who are estimated to lose £3.37 a week due to the change to non-dependant deductions.</p> <p>The vulnerable households that will lose most due to this proposal are lone parents with 3 or more children, although this will only affect 12 households at a rate of £4.11 a week, and households with no children (120 households) at a rate of £4.84 a week.</p> <p>Where the claimant or partner are registered blind or claiming Disability Living Allowance care component (for Universal Credit it must be the middle or higher rate), Personal Independence Payment daily living component then a non-dependant deduction will not be taken. 33% of households with a non-dependant deduction are vulnerable compared to 49% of the total caseload.</p> <p>By retaining the 86% level of protection for the vulnerable households and not implementing a Band D cap, most vulnerable households in receipt of CTS will be protected at their current level of entitlement.</p> <p>Carers</p> <p>It is not known how many people in CTS households would classify themselves as a carer. It is only known if the claimant or partner receive Carers Allowance.</p> <p>407 of the non-vulnerable CTS households are in receipt of Carers Allowance. They are estimated to lose £8.52 a week which is above the average of £7.49 a week for all non-vulnerable CTS households.</p> | | | | |
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| | <p>Households in receipt of Carers Allowance in Band E or above (89 households) are estimated to lose £14.61 a week. This is above the average estimated loss for non-vulnerable CTS households in Band E or above properties at £13.05 a week.</p> <p>22% of households in receipt of Carers Allowance are in Band E or above (89 households, 66 of which are in Band E). 17% of the non-vulnerable CTS households as a whole are in Band E or above. This means a household in receipt of Carers Allowance is more likely to be impacted by the proposal to cap at Band D, than other non-vulnerable CTS households.</p> <p>164 households where Carers Allowance is in payment have non-dependant deductions and will experience loss to their CTS because of the uprating to the deductions. This is across the vulnerable and non-vulnerable households</p> <p>Households in receipt of Carers Allowance may find it more difficult to find work to resolve their financial situation, because of their carer role.</p> <p>The value of the amount of CTS loss stated is based on averages for the existing households who are on the Universal Credit (UC) CTS scheme. See the Impacts section 1b in respect to potential changes to the average level of loss for the caseload as a whole once the UC migration is complete. It is noted that the average level of loss across the caseload could increase once the UC migration completes</p> <p>-</p> | | | | |
| <p>Gender reassignment</p> | <p>No information is held for CTS households in respect to this protected characteristic</p> <p>There are no known indicators that this group would be disproportionately impacted by the proposal to consult on changes to CTS. All working age households in receipt of CTS will be targeted through the Consultation Strategy to increase awareness and it is anticipated that any people with this protected characteristic will have an opportunity to respond to the consultation and therefore raise any potential impacts. The VCS will also be given opportunity to comment on whether additional action may be required to ensure this group can access the consultation.</p> | <p><input type="checkbox"/></p> | <p><input type="checkbox"/></p> | <p><input checked="" type="checkbox"/></p> | <p><input type="checkbox"/></p> |

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| | <p>The level of impact has been recorded as major on the basis that any households with this protected characteristic who will be affected by the proposal will lose on average £7.49 a week.</p> | | | | |
| <p>Marriage and Civil Partnership</p> | <p><u>LBH marriage and Civil Partnership profile:</u></p> <p>Council Tax households: 96,500</p> <p>Office for National Statistics (ONS)</p> <p>In 2022 49.4% of people are married or in a civil partnership. 22.7% living together but not married or in a civil partnership</p> <p><u>CTS caseload marriage and civil partnership profile:</u></p> <p>Of the 4,132 working age CTS non-vulnerable households, 1,460 (35%) are living together as a couple. It is not known whether they are married or in a civil partnership. They are estimated to lose £8.91 a week compared to all non-vulnerable estimated to lose £7.49 a week.</p> <p>1,294 (89%) of the couples have children compared to 73% of the total CTS non-vulnerable caseload. Couples with children are estimated to lose £8.73 a week compared to all non-vulnerable households with children who are estimated to lose £7.59 a week</p> <p>This indicates that couples with and without children are likely to lose more on average than single non-vulnerable households.</p> <p>23% (330 households) of couples live in properties at Band E or above compared to 17% of the non-vulnerable CTS caseload as a whole. This means couples are more likely to be impacted by the proposal to cap at Band D.</p> <p>The estimated level of loss for couples in Band E and above is £13.98 a week compared to £13.05 for non-vulnerable in Band E as a whole. This indicates that couples are likely to lose more than single households.</p> <p>It should be noted that couples are likely to receive proportionately more than equivalent single households. The value of loss may therefore be higher, but the proportion lost may not be.</p> | <p><input type="checkbox"/></p> | <p><input type="checkbox"/></p> | <p><input checked="" type="checkbox"/></p> | <p><input type="checkbox"/></p> |

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| | <p>The value of the amount of CTS loss stated is based on averages for the existing households who are on the Universal Credit (UC) CTS scheme. See the Impacts section 1b in respect to potential changes to the average level of loss for the caseload as a whole once the UC migration is complete. It is noted that the average level of loss across the caseload could increase once the UC migration completes</p> <p>-</p> | | | | |
| <p>Pregnancy and Maternity</p> | <p>No information is held for CTS households in respect to this protected characteristic</p> <p>There are no known indicators that this group would be disproportionately impacted by the proposal to consult on changes to CTS. All working age households in receipt of CTS will be targeted through the Consultation Strategy to increase awareness and it is anticipated that any people with this protected characteristic will have an opportunity to respond to the consultation and therefore raise any potential impacts. The VCS will also be given opportunity to comment on whether additional action may be required to ensure this group can access the consultation.</p> <p>The level of impact has been recorded as major on the basis that any households with this protected characteristic who will be affected by the proposal will lose on average £7.49 a week.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>Race/ Ethnicity</p> | <p>No information is held for CTS households in respect to this protected characteristic</p> <p>There are no known indicators that this group would be disproportionately impacted by the proposal to consult on changes to CTS. All working age households in receipt of CTS will be targeted through the Consultation Strategy to increase awareness and it is anticipated that any people with this protected characteristic will have an opportunity to respond to the consultation and therefore raise any potential impacts. The VCS will also be given opportunity to comment on whether additional action may be required to ensure this group can access the consultation.</p> <p>The level of impact has been recorded as major on the basis that any households with this protected characteristic who will be affected by the proposal will lose on average £7.49 a week.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| Religion or belief | <p>No information is held for CTS households in respect to this protected characteristic</p> <p>There are no known indicators that this group would be disproportionately impacted by the proposal to consult on changes to CTS. All working age households in receipt of CTS will be targeted through the Consultation Strategy to increase awareness and it is anticipated that any people with this protected characteristic will have an opportunity to respond to the consultation and therefore raise any potential impacts. The VCS and faith groups will also be given opportunity to comment on whether additional action may be required to ensure this group can access the consultation.</p> <p>The level of impact has been recorded as major on the basis that any households with this protected characteristic who will be affected by the proposal will lose on average £7.49 a week.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex | <p><u>LBH Sex profile:</u></p> <p>Census 2021:</p> <p>LBH total population 259,200</p> <p>Female: 132,406</p> <p>Male: 128,797</p> <p><u>CTS caseload sex profile:</u></p> <p>All working age CTS households will be impacted</p> <p>Sex data is held for 33% of the caseload for claimants and partners, and 23% of the non-vulnerable caseload. It is therefore not completely reliable and more information will need to be captured through the consultation. Given the low proportion of non-vulnerable households where this information is known, it is not possible to evaluate potential impacts for groups with this protected characteristic.</p> <p>Data does however indicate that there is a higher proportion of lone parents who are female than male. 1,713 in total non-vulnerable are lone parents, 268 or 94% of those whose sex is known are female, 17 or 6%, are male. This indicates that female lone parents are more likely to be impacted than males.</p> <p>Non-vulnerable lone parent households are estimated to lose £7.02 a week compared to the estimated total across the caseload of £7.49. Those with 3 or more children are</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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| | <p>estimated to lose £7.61 which is less than the estimated value across all of the non-vulnerable caseload of £8.28. The likelihood of a lone parent family consisting of 3 or more children is less than across the non-vulnerable caseload as a whole with 75% of lone parent households containing 1 or 2 children compared to 65% of households with children across the total non-vulnerable caseload.</p> <p>There are 281 lone parent non-vulnerable CTS households who live in a Band E or above council tax property. This equates to 16% which is the same as the non-vulnerable total caseload</p> <p>The average level of loss for lone parents in Band E or above is estimated as £12.29 a week compared to £12.71 for all non-vulnerable with children and £14.24 for non-vulnerable without children. This indicates that lone parents are not expected to be disproportionately impacted by the proposal than other households.</p> <p>It should be noted that couples are likely to receive proportionately more than equivalent single households. The value of loss for lone parents may therefore be lower, but the proportion lost may not be.</p> <p>The value of the amount of CTS loss stated is based on averages for the existing households who are on the Universal Credit (UC) CTS scheme. See the Impacts section 1b in respect to potential changes to the average level of loss for the caseload as a whole once the UC migration is complete. It is noted that the average level of loss across the caseload could increase once the UC migration completes</p> <p>Victims of domestic abuse will potentially be impacted by these changes if they are in receipt of CTS. It is not always known who these CTS households are. The majority are believed to be female. The Council's Housing and Adult services, in particular Domestic Abuse services, will be engaged with, along with the VCS, to understand what the potential impacts may be for this group and how it can be ensured they feed in their views to the consultation.</p> <p>-</p> | | | | |
| <p>Sexual Orientation</p> | <p>No information is held for CTS households in respect to this protected characteristic</p> <p>There are no known indicators that this group would be disproportionately impacted by the proposal to consult on changes to CTS. All working age households in receipt of</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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| | <p>CTS will be targeted through the Consultation Strategy to increase awareness and it is anticipated that any people with this protected characteristic will have an opportunity to respond to the consultation and therefore raise any potential impacts. The VCS will also be given opportunity to comment on whether additional action may be required to ensure this group can access the consultation.</p> <p>The level of impact has been recorded as major on the basis that any households with this protected characteristic who will be affected by the proposal will lose on average £7.49 a week.</p> | | | | |
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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

The managed migration to Universal Credit is taking place in 2024 to Dec 2025. The majority of the households who are in receipt of working age CTS and not currently on Universal Credit will have to start to claim at a similar time to the proposed change in their CTS. Transitional protection means that households should not see a reduction in their benefits as a result of the migration. However, they will need to start to budget differently as Universal Credit is paid monthly and includes housing costs in one payment to the claimant which is different to how many households will have previously received their benefits. Budgeting for a reduction in Council Tax Support at the same time as the move to Universal Credit will be an additional factor for impacted households to manage.

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 |
|---|---|---|---|-----------------------|
| <p>4,132 working age households are estimated to lose on average £7.49 a week</p> <p>3,088 households containing 6,794 children are estimated to lose on average £7.59 a week.</p> <p>1,058 larger households with 3+ children are estimated to lose on average £8.28 a week</p> <p>575 households with children are more likely to be impacted by the proposal to cap at Band D. The proposal reduces entitlement by proportionately more than the other</p> | <p>A robust consultation is proposed to fully understand the potential impacts of these proposals, as stated above. The consultation aims to engage with groups with protected characteristics, particularly where data is not currently held, to understand who is likely to be impacted and what the impacts might be. In addition, the consultation will ask a broad range of diverse stakeholders for views on mitigations which are proposed to assist impacted households. Consideration is being given to</p> <ul style="list-style-type: none"> - Phasing in the changes for those experiencing greatest losses over two years | <p>Analysis of feedback from the consultation will indicate whether additional information has been obtained in respect to groups with protected characteristics, who is likely to be impacted, what the impacts will be and views on the mitigations.</p> | <p>Consultation will run 01/08/24 to 25/10/24</p> | <p>Jenny Townsley</p> |

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| <p>proposals. This group are estimated to lose on average £12.71 a week There are proportionately more households with children in Band E or higher properties than in the caseload as a whole and more again with 3+ children</p> | <ul style="list-style-type: none"> - Implementing a hardship scheme of £125k for 2025/26 for people struggling to pay their council tax as a result of the changes - Allocating £25k to deliver welfare advice to assist those impacted by the changes to access financial advice | | | |
| <p>47 mixed age couples which include people of pension age will be impacted by the proposals</p> | | | | |
| <p>People of pension age who are non-dependants would be expected to pay the additional non-dependant deduction.</p> | | | | |
| <p>472 vulnerable households are estimated to lose on average £4.25 a week due to an increase to non-dependant deductions. The total loss may be higher if they are also impacted by other elements of the proposal</p> | | | | |
| <p>407 of the impacted non-vulnerable CTS households are in receipt of Carers Allowance and are estimated to lose more than average at £8.52 a week.</p> | | | | |

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| <p>This group are proportionately more likely to be impacted by the proposal to cap at Band D</p> | | | | |
| <p>1,460 couples are expected to lose more than single households at a rate of £8.91 a week.</p> <p>This group are proportionately more likely to be impacted by the proposal to cap at Band D</p> | | | | |
| <p>1,713 lone parents are expected to be impacted by this proposal.</p> <p>Indications are that they will not be disproportionately negatively impacted compared to other non-vulnerable CTS households with children</p> | | | | |

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

The proposal to consult is to capture views of stakeholders on the proposed changes to the London Borough of Harrow's Council Tax Support scheme. One of the key objectives of the consultation is to understand which groups with protected characteristics will be impacted and their views on how they will be impacted. The VCS and faith groups will be engaged with to assist in understanding who the impacted groups might be and the best approach for ensuring these groups are aware of and can feed into the consultation to give their views. This information will help to inform the EQIA if a change to the scheme is to be taken forward. The consultation will also capture views on potential mitigations which may be implemented to assist people who are impacted by the proposal. These mitigations will assist people with protected characteristics to manage the change to their CTS entitlement

This EQIA will be updated once the consultation responses are available.

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

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Appendix A

Current working age Universal Credit Council Tax Support scheme

Working Age – in receipt of Universal Credit

- **Claimant category A**– Universal Credit Vulnerable - CTS award is **86% of weekly eligible CT** payable (less non-dependant deduction if applicable)
- **Claimant category B** – in receipt of maximum UC – CTS award is **70% of weekly eligible CT** (less non-dependant deduction if applicable)
- **Claimant categories below** - CTS award is the corresponding % of weekly eligible CT in line with weekly net income (less non-dependant deduction if applicable)

| | 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 with up to 2 children - weekly net income | Percentage award of weekly eligible Council Tax | Lone parents with 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 |

If entitlement is less than £2 week, no award is made

Current working age non-Universal Credit Council Tax Support scheme

The London Borough of Harrow scheme for households who are not on Universal Credit is means tested. The scheme calculates entitlement based on claimant and partner income and an applicable amount. The applicable amount is calculated using the rates set by Department for Work and Pensions for other Benefits and is the amount the households is deemed to need to live on. A taper is then applied on the difference between the income and applicable amount.

The full council tax payable is taken into consideration and then either 70% or 86% if the household is classified as vulnerable is used in the calculation.

Calculation

Income less Disregarded Income = A (Total income)

A (Total income) less B (Applicable Amount) = C (Excess income)

30% taper of C (Excess income) = E (tapered income)

D: 70% of CT payable (86% if classified as vulnerable as per Universal Credit scheme)

D (70%/86% CT payable less E (tapered income) = CTS entitlement less any non-dependant deductions

If entitlement is less than £2 week, no award is made

Non-dependant deduction rates

| Non-Dependant Income | CTS non- working age non-Universal Credit scheme Weekly deductions | CTS Working age Universal Credit scheme Weekly deductions |
|---|---|--|
| Aged under 25 and on IS, JSA(IB), ESA(IR) assessment phase or Maximum Universal Credit | £3.30 | £3.30 |
| Aged 25 or over and on IS/JSA(IB) or Maximum Universal Credit | £3.30 | £3.30 |
| Aged 18 or over and not in remunerative work | £6.60 | £3.30 |
| In receipt of main phase ESA(IR) | £3.30 | £3.30 |
| In receipt or ESA (C) | £3.30 | £3.30 |
| In receipt of JSA (C) | £6.60 | £3.30 |
| In receipt of Pension Credit | £3.30 | £3.30 |
| In work but earning less than £144 | £6.60 | £3.30 |
| Gross income not less than £144.00 but less than £256.00 a week | £6.60 | £13.10 |
| Gross income not less than £256.00 but less than £445.00 a week | £13.10 | £13.10 |

| | | |
|---|--------|--------|
| Gross income not less than £445.00 but less than £554.00 a week | £16.50 | £13.10 |
| Gross income not less than £554.00 a week | £19.80 | £13.10 |

Appendix B - Proposed working age Universal Credit Council Tax Support scheme

Working Age – in receipt of Universal Credit

- **Claimant category A** – Universal Credit Vulnerable – CTS award is **86% of weekly eligible CT** payable (less non-dependant deduction if applicable)
- **Claimant category B** – in receipt of maximum UC – award is **50% of weekly eligible CT** payable (less non-dependant deduction if applicable)
- **Claimant categories below** – CTS award is the corresponding % of weekly eligible CT in line with weekly net income (less non-dependant deduction if applicable)

For categories B – F, the maximum eligible CT payable that will be taken into account in the calculation is at Band D inclusive of any discounts or exemptions such as Single Person Disregard

For all categories A – F, the rate of non-dependant deductions will be updated as set out below

| | 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 with up to 2 children - weekly net income | Percentage award of weekly eligible Council Tax | Lone parents with 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 |
| 50% | £0-£75 | 50% | £0-£75 | 50% | £0-£100 | 50% | £0-£100 | 50% | £0-£125 | 50% | £0-£125 |
| 40% | £75.01-£125 | 40% | £75.01-£125 | 40% | £100.01-£140 | 40% | £100.01-£150 | 40% | £125.01-£165 | 45% | £125.01-£150 |
| 20% | £125.01-£175 | 35% | £125.01-£175 | 35% | £140.01-£175 | 35% | £150.01-£200 | 35% | £165.01-£200 | 40% | £150.01-£200 |
| 0% | >£175 | 20% | £175.01-£225 | 20% | £175.01-£225 | 25% | £200.01-£275 | 20% | £200.01-£250 | 30% | £200.01-£275 |
| | | 0% | >£225 | 10% | £225.01-£275 | 10% | £275.01-£325 | 10% | £250.01-£300 | 15% | £275.01-£375 |
| | | | | 0% | >£275 | 0% | >£325 | 0% | >£300 | 0% | >£375 |

If entitlement is less than £2 week, no award is made

Proposed working age non-Universal Credit Council Tax Support scheme

The London Borough of Harrow scheme for households who are not on Universal Credit is means tested. The scheme calculates entitlement based on claimant and partner income and an applicable amount. The applicable amount is calculated using the rates set by Department for Work and Pensions for other Benefits and is the amount the households is deemed to need to live on. A taper is then applied on the difference between the income and applicable amount

The full council tax payable will only be taken into consideration up to Band D. If the household lives in Band E or above, the value used will be capped at Band D inclusive of any discounts or exemptions such as Single Person Discount.

A protected rate of 86% of the council tax payable will continue to be used in the calculation if the household is classified as vulnerable.

If the household is not classified as vulnerable, the reduced rate of 50% of the council tax payable will be used in the calculation

Calculation for a non-vulnerable household

Income less Disregarded Income = A (Total income)

A (Total income) less B (Applicable Amount) = C (Excess income)

30% taper of C (Excess income) = E (tapered income)

D: 50% of CT payable

D (50% CT payable) less E (tapered income) = CTS entitlement less any non-dependant deductions

If entitlement is less than £2 week, no award is made

Proposed non-dependant deduction rates

| Non-Dependant Income | CTS non- working age non-Universal Credit scheme Weekly deductions | CTS Working age Universal Credit scheme Weekly deductions |
|--|---|--|
| Aged under 25 and on IS, JSA(IB), ESA(IR) assessment phase or Maximum Universal Credit | £4.55 | £4.55 |
| Aged 25 or over and on IS/JSA(IB) or Maximum Universal Credit | £4.55 | £4.55 |
| Aged 18 or over and not in remunerative work | £9.10 | £4.55 |
| In receipt of main phase ESA(IR) | £4.55 | £4.55 |
| In receipt or ESA (C) | £4.55 | £4.55 |
| In receipt of JSA (C) | £9.10 | £4.55 |
| In receipt of Pension Credit | £4.55 | £4.55 |
| In work but earning less than £144 | £9.10 | £4.55 |
| Gross income not less than £144.00 but less than £256.00 a week | £9.10 | £18.10 |

| | | |
|---|--------|--------|
| Gross income not less than £256.00 but less than £445.00 a week | 18.10 | £18.10 |
| Gross income not less than £445.00 but less than £554.00 a week | £22.70 | £18.10 |
| Gross income not less than £554.00 a week | £27.30 | £18.10 |