



**HILLINGDON**  
LONDON

## Equality and Human Rights Impact Assessment

### **STEP A) Description of what is to be assessed and its relevance to equality**

**What is being assessed?** Please tick ✓

Review of a service      Staff restructure      Decommissioning a service  
Changing a policy ✓      Tendering for a new service      A strategy or plan

A review of the Council Tax Reduction Scheme

Who is accountable? E.g. Head of Service or Corporate Director

Sunita Ghudial, Head of Benefits

Date assessment completed and approved by accountable person

12/12/2022

Names and job titles of people carrying out the assessment

Sunita Ghudial, Head of Benefits  
Tiffany Boreham, Benefits Team Manager  
Vicky Trott, Equality, Diversity and Inclusion Manager

A.1) What are the main aims and intended benefits of what you are assessing?

The aim of the Council Tax Reduction (CTR) Scheme is to help low-income residents in the borough by reducing the amount of council tax they are liable to pay. Around 18,000 households in the borough receive CTR, almost 13,000 of which are working age.

Hillingdon Council's Working Age Council Tax Reduction Scheme was last updated in April 2020 when we introduced a banding scheme. Since then, no changes have been made to the scheme other than prescribed legal amendments.

The banding scheme has helped to simplify the assessment of Council Tax Reduction and allows for minimal income changes that do not necessarily change the award of Council Tax Reduction. This creates less uncertainty over what the Council Taxpayer must pay, and fewer bills with amended instalment amounts.

At the same time, we introduced a flat rate non-dependant deduction to simplify the various non-dependant deductions that were in place previously. This was set at £5.00 per week for each non-dependant in the household.

Since we introduced our banding scheme the demand for Council Tax Reduction has grown by 16% and reached its highest level in April 2021 due to the pandemic. Although it was predicted that demand would reduce post Covid-19 the number of people receiving Council Tax Reduction has not reduced to pre pandemic levels and has been dropping at a rate of roughly 3% per year.

The proposed changes are intended in a balanced and proportionate way to help reduce the overall cost of the scheme as the unexpected increase in demand has put immense pressure on an already limited budget.

We propose to make the following changes to the criteria for working age households from April 2023:

- Increase the weekly non-dependant deduction
- Increase the minimum weekly award amount

The proposed changes will not affect applicants of pensionable age as they are protected by legislation.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

### Total population of Council Tax Reduction Scheme claimants

As at October 2022 there were 116,422 properties within the borough with a Council Tax liability. At that time, Hillingdon had 17,883 households receiving CTR, showing that 15.47% of total households receive Council Tax Reduction.

Of the 17,833 households receiving CTR, the breakdown of impacted groups is as follows: 5,116 are pensioners; with 12,767 being working age (of which, 5,722 are classed as vulnerable).

The following tables show the equality data available for the customers receiving CTR and the number and percentage of those who will be affected by the proposals.

**Table 1: Disability**

| Category of Customer               | Number        | % of Total    | Number of claimants affected | % of claimants affected |
|------------------------------------|---------------|---------------|------------------------------|-------------------------|
| Working Age – with a disability    | 5,722         | 44.82%        | 1,120                        | 62.78%                  |
| Working Age – without a disability | 7,045         | 55.7%         | 664                          | 37.22%                  |
|                                    | <b>12,767</b> | <b>100.0%</b> | <b>1,784</b>                 | <b>100%</b>             |

Our working age ‘with a disability’ category includes applicants or their partners or their children who are in receipt of Disability Living Allowance, Personal Independence Payments, Attendance Allowance, Employment and Support Allowance Support Component, the Disabled Child Element of Universal Credit or who are registered blind.

No non-dependant deduction is made in respect of any non-dependant if the applicant or their partner is blind or treated as blind, receiving attendance allowance or the daily living component of personal independence payments.

**Table 2: Age**

| Age range          | Claimant Count (working aged claimants) | Total % of Claimants | Number of claimants affected | % of claimants affected | % Difference |
|--------------------|---|----------------------|------------------------------|-------------------------|--------------|
| 18-19              | 20                                      | 0.2%                 | 0                            | 0%                      | -0.2%        |
| 20-29              | 1280                                    | 10.03%               | 17                           | 0.95%                   | -9.07%       |
| 30-39              | 3284                                    | 25.72%               | 77                           | 4.32%                   | -21.41%      |
| 40-49              | 3453                                    | 27.05%               | 485                          | 27.19%                  | 0.14%        |
| 50-64              | 4402                                    | 34.48%               | 1135                         | 63.62%                  | 29.14%       |
| 65+                | 323                                     | 2.53%                | 70                           | 3.92%                   | 1.39%        |
| <b>Grand Total</b> | <b>12767</b>                            | <b>100%</b>          | <b>1784</b>                  | <b>100%</b>             |              |

**Table 3: Ethnicity**

| <b>Ethnicity</b>                            | <b>Claimant Count</b> | <b>% of Claimants</b> | <b>Number of claimants affected</b> | <b>% of claimants affected</b> | <b>% Difference</b> |
|---|-----------------------|-----------------------|-------------------------------------|--------------------------------|---------------------|
| Any other mixed background                  | 48                    | 0.37%                 | 2                                   | 0.11%                          | -0.26%              |
| Asian and White                             | 46                    | 0.36%                 | 7                                   | 0.39%                          | 0.03%               |
| Asian/Asian British Bangladeshi             | 104                   | 0.82%                 | 25                                  | 1.4%                           | 0.58%               |
| Asian/Asian British Indian                  | 314                   | 2.46%                 | 62                                  | 3.48%                          | 1.02%               |
| Asian/Asian British Pakistani               | 287                   | 2.25%                 | 63                                  | 3.53%                          | 1.28%               |
| Asian or British: Any other background      | 272                   | 2.13%                 | 44                                  | 2.47%                          | 0.34%               |
| Black African and Black British African     | 713                   | 5.59%                 | 125                                 | 7.01%                          | 1.42%               |
| Black African and White                     | 35                    | 0.27%                 | 6                                   | 0.34%                          | 0.07%               |
| Black British other                         | 103                   | 0.81%                 | 19                                  | 1.07%                          | 0.26%               |
| Black Caribbean and Black British Caribbean | 157                   | 1.23%                 | 16                                  | 0.91%                          | -0.32%              |
| Black Caribbean and White                   | 76                    | 0.6%                  | 10                                  | 0.56%                          | -0.04%              |
| British and White British                   | 2,498                 | 19.57%                | 338                                 | 18.95%                         | -0.62%              |
| Chinese                                     | 16                    | 0.18%                 | 1                                   | 0.05%                          | -0.13%              |
| Irish with White Irish                      | 98                    | 0.77%                 | 25                                  | 1.4%                           | 0.63%               |
| Not completed                               | 6,582                 | 51.55%                | 739                                 | 41.42%                         | -10.13%             |
| Other                                       | 619                   | 4.84%                 | 127                                 | 7.11%                          | 2.27%               |
| Traveller                                   | 7                     | 0.05%                 | 0                                   | 0%                             | -0.05%              |
| White (including white other)               | 792                   | 6.2%                  | 175                                 | 9.81%                          | 3.61%               |
| <b>Grand Total</b>                          | <b>12,767</b>         | <b>100%</b>           | <b>1,784</b>                        | <b>100%</b>                    |                     |

**Table 4: Sex**

| Gender             | Claimant Count | % of Claimants | Number of claimants affected | % of claimants affected | % Difference |
|--------------------|----------------|----------------|------------------------------|-------------------------|--------------|
| Female             | 8,069          | 63.20%         | 1,360                        | 76.23%                  | 13.03%       |
| Male               | 4,305          | 33.72%         | 358                          | 20.07%                  | -13.65%      |
| <b>Not known</b>   | 393            | <b>3.08%</b>   | 66                           | <b>3.70%</b>            | 0.62%        |
| <b>Grand Total</b> | <b>12,767</b>  | <b>100%</b>    | <b>1,784</b>                 | <b>100%</b>             |              |

## A.3) Who are the stakeholders in this assessment and what is their interest in it?

| Stakeholders   | Interest   |
|--|--|
| Council Tax Reduction Claimants  | To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.  |
| Local Interest Groups e.g., CAB, DASH, Hillingdon Carers   | These groups may work with the affected claimants and will need to have the right information to provide support and advice.   |
| Hillingdon Residents   | Not making changes to the scheme may put increased financial pressures on other Council services which may have an impact on some Hillingdon residents.  |
| <ul style="list-style-type: none"> <li>● Corporate Director of Finance</li> <li>● Chief Executive</li> <li>● Head of Benefits</li> <li>● Cabinet Member for Finance, Property and Business Services</li> <li>● Council Cabinet</li> <li>● Leader of the Council</li> </ul> | To ensure any changes to the scheme are applied in a lawful, fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Hillingdon residents. |
| The Precepting Authorities   | Legal requirement. We collect Council Tax on their behalf, with precepting authorities funding 21.95% of the scheme.   |

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

|                               |   |                    |   |
|-------------------------------|---|--------------------|---|
| Age                           | ✓ | Sex                | ✓ |
| Disability                    | ✓ | Sexual Orientation |   |
| Gender reassignment           |   |                    |   |
| Marriage or civil partnership |   | Carers             |   |
| Pregnancy or maternity        |   | Community Cohesion |   |
| Race/Ethnicity                | ✓ | Community Safety   |   |
| Religion or belief            |   | Human Rights       |   |

**STEP B) Consideration of information; data, research, consultation, engagement**

B.1) Consideration of information and data - what have you got and what is it telling you?

**Age** - The data shows that those claimants aged 50 to 64 (63.62% of claimants affected) are more likely to be affected by the proposals when compared to the working age caseload data (34.48% of claimants).

**Disability** - The data shows that 62.78% of working age claimants have a disability and have a non-dependant living with them. This shows a significant increase when compared with 44.82% of the total working aged caseload having a disability.

**Ethnicity/Race** - Data is available for 48.45% of working age claimants with 51.55% unknown, for this reason the Council has decided not to assess this characteristic in this Equalities Impact Assessment.

**Sex** - The data indicates that more women claim CTR than men.

## Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick NO  YES

No specific consultation has been carried out as part of this assessment however a full public consultation on the changes to the scheme was undertaken.

Full details can be found in the Appendix attached.

B.3) Provide any other information to consider as part of the assessment

### **Proposed Scheme details**

#### **Proposal 1 – Increase the non-dependant deduction to £8.00 per week**

A non-dependant deduction is an amount that is deducted from the Council Tax Reduction entitlement in respect of a person aged over 18 living in the property. This is the non-dependant's indirect contribution to the Council Tax charge.

Currently, applicants who have non-dependants living with them who are working or claiming benefits have a flat rate non-dependant deduction of £5.00 per week applied to their Council Tax Reduction.

We propose to increase the flat rate non-dependant deduction to £8.00 per week.

There are very few councils that have a flat rate non-dependant charge. Most councils continue to operate a two-tier non-dependent charge with an 'out of work' and 'in work' charge. These charges can vary from no deduction up to £20 per week. The proposed increase up to £8.00 is considerably lower than the £20.00 that some councils apply to the 'in work' group and is affordable.

Pensioner Council Tax Reduction is still assessed under a protected scheme with varying amounts of non-dependant deduction depending on the non-dependant's income.

The average of the pensioner non-dependant deductions is £9.08 per week, our proposal of £8.00 per week is less than this average. Also, the pensioner non-dependant deductions are uprated yearly and are likely to be increased in April 2023. We have not uprated our non-dependant deduction since April 2020.

We will not be changing the criteria for the group of non-dependants for whom there is currently no non-dependant deduction.

No deduction is made in respect of any non-dependant if the applicant or their partner is blind or treated as blind, receiving attendance allowance or the daily living component of personal independence payments.

Also, no deduction is made in respect of any non-dependant if

- although they live with the applicant, it appears to the council that their normal home is elsewhere; or
- they are a full-time student or they are not living with the customer because they have been a patient for a period in excess of 52 weeks, or
- they have attained the qualifying age for a state pension

## **Proposal 2 – Increase the minimum award amount**

Under the current arrangements within the scheme, applicants who are entitled to receive less than £1.00 per week in Council Tax Reduction do not receive this amount as the minimum weekly award is £1.00.

We propose to increase the minimum award to £2.00 per week. This means that if the Council Tax Reduction is calculated at less than £2.00 no Council Tax Reduction will be awarded.

A number of other neighbouring Councils currently have this £2.00 per week minimum Council Tax Reduction award. This will reduce administration costs and provide greater stability for applicants.

### **National policy context**

From April 2013, local authorities across England were given the power to devise their own systems of Council Tax Support (CTS) for working-age adults. It replaced the national system of the Council Tax Benefit (CTB), which ensured that the poorest households did not have to pay council tax. Each year the local authority decides how CTR should work in their area. There is a legal requirement for the Secretary of State to carry out a review of all CTR schemes in England.

### **Legal context**

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010).

### **Financial context**

Since 2010, the Business Improvement Delivery (BID) Programme has driven transformation across the Council, reducing costs and improving efficiency to ensure that in an environment of increased expenditure from population growth and inflationary uplifts we continue to deliver high quality services that put residents first.

Hillingdon's approach to maintaining sound financial management ensures that our finances are



in a robust position, and therefore the Council is well placed to respond to Government funding not increasing at the same pace as the combined impact of a growing demand for services and increased market forces. Our latest projections indicate that further savings of £35m will be required by 2026/27 to bridge the resulting budget gap.

### **CTR Scheme Funding**

The CTR Scheme forms part of the base budget within Council Tax as presented by the Council in the overall position of the Collection Fund, this is the name of the fund given to the Council's Tax raising activities including both Council Tax and Business Rates.

## **C) Assessment**

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

| <b>Equality Group</b> | <b>Impact on this group and actions you need to take</b>   |
|-----------------------|--|
| Age                   | <p>The data shows that the age band 50-64 is more likely to be impacted by the proposals.</p> <p>This can be explained by the fact more people in this age group are likely to have an adult child living with them.</p> <p>If any claimant from this age group is adversely affected by the changes, then they would be able to approach the council for financial support.</p> |
| Sex                   | <p>The data shows that women are more likely to be impacted by the proposals</p> <p>This can be explained by the fact that more women head up single parent families with adult children living with them.</p> <p>If any claimant from this age group is adversely affected by the changes, then they would be able to approach the council for financial support.</p>           |

C.2) Describe any **POSITIVE** impacts

| <b>Equality Group</b>             | <b>Impact on this group and actions you need to take</b>  |
|-----------------------------------|---|
| Disability                        | <p>We will not be changing the criteria for the group of non-dependants for whom there is currently no non-dependant deduction.</p> <p>This covers when an applicant or their partner is blind or treated as blind, receiving attendance allowance or the daily living component of personal independence payments.</p> |
| Those in receipt of state pension | Pensioners are protected from changes in support introduced as part of the Working age CTR Scheme.  |

**D) Conclusions**

The council has taken care to review and update the CTR Scheme to ensure that it is simple, efficient and meets the requirements made under the Government’s statement of intent.

The proposal to increase the non-dependant deduction has an indirect impact on the applicant as it is assumed that the non-dependant will increase their contribution towards the Council Tax bill. This proposal does not specifically impact upon a protected group.

The proposal to increase the minimum award amount has been developed to deliver a simpler, less administratively burdensome CTR scheme while reducing the overall cost of the scheme.

If anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance.

The proposed changes will not affect pensioners. This is mandatory as legislation prescribes that CTR schemes in respect of pensioners must adhere to one national scheme.

The council is proposing to make these changes which will be adopted 1 April 2023 and will be in place for the duration of 2023/24, during which time its impact will be monitored.

**Signed and dated:** .....

**Name and position:** Sunita Ghudial - Head of Benefits