



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

Hillingdon Council's Working Age Council Tax Reduction Scheme changed to a banding scheme in April 2020. Since then, it was updated in 2023 with changes to the weekly non-dependent deduction and the minimum weekly award amount. No further 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.

There are 8 proposals to change the banding scheme which are intended in a balanced and proportionate way to help reduce the overall cost of the scheme as the continued increase in demand has put immense pressure on an already limited budget.

This assessment considers the proposed changes to the Council Tax Reduction scheme from an equality and human rights impact perspective.

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

Richard Ennis, Corporate Director of Finance

Date assessment completed and approved by accountable person

06/01/25

Names and job titles of people carrying out the assessment

Tiffany Boreham, Head of Revenues and Benefits

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

Proposed reforms of the scheme are intended to meet two policy objectives, in the context of competing demands on finite funding available to support local services:

1. Improving the targeting of support to those households in greatest need, and;
2. Reducing the administrative burden of the scheme to deliver efficiency savings within the Revenues & Benefits Service.

The Council Tax Reduction scheme proposals are -

1. Align the vulnerable group percentage reduction with the rest of the scheme over a phased approach lasting 4 years.
2. Remove the war widow pension group from the scheme.
3. Remove Transitional Protection.
4. Increase the minimum weekly award to £3.
5. Reduce the absence abroad to 4 weeks in line with Pensioner CTR scheme change.
6. Cap the amount of Council Tax liability to be used in the calculation to Band D (non-vulnerable households only).
7. Increase the non-dependant deduction from £8 to £10 per week.
8. Introduce additional support for care leavers

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

Those currently in receipt of Council Tax Reduction could be impacted by any changes to the scheme.

Our current caseload is 17,257 which includes 12,637 working age households. Our pensioner caseload is protected and will not be affected by any of these changes.

Caseload equalities data

Sex

Male	4301	34%
Female	8336	66%
Total	12637	100%

66% of the claimants within the working age scheme are female.

Ethnicity

Not completed/Any other	7622	60.3%
White British	2954	23.4%
European other	127	1%
Asian and White	37	0.3%
Black African and White	29	0.2%
Black Carribean	66	0.5%
Black Carribean and White	72	0.6%
Black African	342	2.7%
Black other	93	0.7%
Irish	90	0.7%
Indian	112	0.9%
Pakistani	108	0.8%
Bangladeshi	45	0.4%
Chinese	13	0.1%
Asian or Asian British: Bangladeshi	48	0.4%
Asian or Asian British: Indian	154	1.2%
Asian or Asian British: Pakistani	130	1%
Asian or British: Any other Background	207	1.6%
Black-Black British: African	281	2.2%
Black-Black British: Caribbean	102	0.8%
Travellers	5	0.04%
Total	12637	100%

We do not have ethnicity data for over half of the working age caseload as this information has not been completed on the form or the customer has selected 'any other group' which is not an ethnicity. This is something we are looking to improve as based on current data we are unable to properly determine whether the proposed changes will have an impact on a particular ethnicity.

Disability

Disabled	6800	54%
Not disabled	5837	46%
Total	12637	100%

Over half of the customers within our working age scheme are disabled.

We do not hold information regarding other protected characteristics.

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

Stakeholders	Interest
Hillingdon residents	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Corporate Director of Finance	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Cabinet Member for Finance and Transformation	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Council Cabinet and Leader of the Council	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Voluntary and Third Sector partners	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to 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		Socio-economic status	
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?

The data presented in this assessment is of the claimant rather than of the household. We acknowledge that the changes may have an impact on the household as a whole, but it is not possible to determine what those impacts may be.

We understand that women are more likely to claim benefits and more likely to be in a single parent household. This potentially has an impact on income and socio-economic status.

We acknowledge that in the absence of 60% of data for ethnicity, it is not possible to determine any disproportionate impacts of the proposals based on those grounds.

The impact of each of the proposals has been assessed using the data which is available.

Proposal 1 - Align the vulnerable group percentage reduction with the rest of the scheme over a phased approach lasting 4 years.

This proposal would have a negative impact on the 6800 households where someone has a disability which equates to 54% of our caseload.

Of those claimants who have a disability:

Male	2311	34%
Female	4489	66%
Total	6800	100%

The percentage of females with a disability is in line with the proportion of females in the scheme.

Proposal 2 - Remove the war widow pension group from the scheme

This proposal would have an administrative benefit to the Local Authority and there are currently no residents that would be affected by this proposal as no one falls into this scheme.

The war widows are covered by the Pension Age version of the Council Tax Reduction Scheme.

Proposal 3 - Remove Transitional Protection

This proposal would have an administrative benefit to the Local Authority.

Transitional Protection has been awarded to eligible Households since the Banding Scheme went live in April 2020. There are less than 20 households left that receive this support which equates to 0.15% of the total scheme. If we decide to remove the protection they will be written to and offered to apply for help under Section 13a if they feel they still require some support.

Proposal 4 - Increase the minimum weekly award to £3

159 Claimants would be impacted by this change.

1 Claimant is in the Vulnerable Passported Scheme

Of those 159 claimants:

Male	48	30%
Female	111	70%
Total	159	100%

Slightly more females are affected by this change when compared to the total number of female claimants of 66%.

Proposal 5 - Reduce the absence abroad to 4 weeks in line with Pensioner CTR scheme change.

This proposal would also have an administrative benefit to the Local Authority.

Residents would only be affected after 01/04/25 if they were to be absent abroad for more than 4 weeks. It is estimated that this would equate to less than 1% of the scheme who would be affected by this proposal during 2025.

Proposal 6 - Cap the amount of Council Tax liability to be used in the calculation to Band D (non-vulnerable households only)

This proposal is for non-vulnerable households only and would affect households in larger properties. We have 436 working age households in Council Tax Bands E-H in receipt of Council Tax Reduction.

Of those 436 households, the claimants are:

Male	187	43%
Female	249	57%
Total	436	100%

The split by sex is more even than the overall caseload for this change.

Proposal 7 - Increase the non-dependant deduction from £8 to £10 per week

1617 claimants would be impacted by this change.

Of those 1617 claimants:

Male	383	24%
Female	1234	76%
Total	1617	100%

Of those 1617 claimants:

Disabled	602	37%
Not disabled	1015	63%
Total	1617	100%

More females are impacted by this change than the overall split. Based on our caseload, this could be because females are more likely to have older children living with them, or elderly family members who the females are caring for.

Fewer disabled customers are affected by this change when compared with the overall caseload split. This is because the non-dependant deduction is not applied where the claimant or their partner are in receipt of a disability benefit. It only applies where the dependant is the one receiving a disability benefit.

Proposal 8 - Introduce additional support for care leavers

This proposal would have a positive impact for Care Leavers up to the age of 21. Based on information from Children's Social Services this additional financial support would be provided to approx. 50 Care Leavers per year.

Consultation

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

Please tick NO YES

The Council Tax Reduction consultation went live on 31/10/24 for 6 weeks and closed at midnight on 11/12/24.

During the 6 weeks we received 45 responses to our proposals.

To promote the consultation, we contacted CAB and DASH so that they could discuss the consultation with their customers. We also put a banner on the Revenues and Benefits webpages with a link to the consultation and used social media to increase awareness.

The Capita contact centre advertised the consultation through their initial greeting

on the phone line and the customer advisors promoted it when speaking to residents. The GLA were also sent details of the consultation.

Details of respondents

Out of the 45 responses 22 were from females, 17 were from males and 6 preferred not to state their sex.

Sex	
Male	17
Female	22
Prefer not to say	6

The majority of responses were from the 45-54 age range

Age range	
25-34	6
35-44	10
45-54	14
55-64	8
65+	4
Prefer not to say	3

Most of the responses were from within Hillingdon with only 1 being out of borough

Postcode	
HA4	9
HA5	4
HA6	2
TW19	1
UB10	4
UB3	6
UB4	2
UB7	4
UB8	10
Blank	3

Out of the 45 responses 13 confirmed they had a disability.

Disability Yes/No	
Yes	13
No	29
Prefer not to say	3

The majority of respondents were from a white group or background

Ethnicity group or background	
Asian or Asian British	5
Black, Black British, Caribbean or African	3
Mixed or multiple ethnic group or background	3

Other ethnic group or background	1
Prefer not to say	11
White group or background	22

Only 10 customers that responded to the consultation confirmed they were in receipt of Council Tax Reduction.

CTR Yes/No	
Yes	10
No	27
Don't know	8

One third of the responses were from customers who had a non-dependant living with them

Non-dependant Yes/No	
Yes	15
No	30

Responses to each Proposal

The 8 proposals that we consulted on were to

1. Align the vulnerable group percentage reduction with the rest of the scheme over a phased approach lasting 4 years.
2. Remove the war widow pension group from the scheme.
3. Remove Transitional Protection.
4. Increase the minimum weekly award to £3.
5. Reduce the absence abroad to 4 weeks in line with Pensioner CTR scheme change.
6. Cap the amount of Council Tax liability to be used in the calculation to Band D (non-vulnerable households only).
7. Increase the non-dependant deduction from £8 to £10 per week.
8. Introduce additional support for care leavers.

Table 1 - Breakdown of responses

Response	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Total
Align the vulnerable group	11	9	10	3	12	45
Remove the war widow pension group	11	14	11	3	6	45
Remove transitional protection	11	18	6	3	7	45
Increase the minimum weekly award to £3.00	9	13	10	6	7	45
Reduce the absence	14	14	4	4	9	45

abroad to 4 weeks						
Cap the amount of CTAX liability to Band D	8	12	10	3	12	45
Increase the non dep deduction to £10.00	8	19	10	1	7	45
Introduce additional support for carers	16	15	7	1	6	45
Total	88	114	68	24	66	360
Percentage	24%	32%	19%	7%	18%	100%

As you can see from the table the response to all proposals was mostly positive with strongly agree and agree being the combined highest score.

Table 2 - Breakdown of responses from the 10 residents in receipt of Council Tax Reduction

Response	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Total
Align the vulnerable group	2	3	1	1	3	10
Remove the war widow pension group	2	3	3	2	0	10
Remove transitional protection	2	4	2	1	1	10
Increase the minimum weekly award to £3.00	2	4	2	2	0	10
Reduce the absence abroad to 4 weeks	3	4	1	0	2	10
Cap the amount of CTAX liability to Band D	3	3	1	0	3	10
Increase the non dep deduction to £10.00	2	6	2	0	0	10
Introduce additional support for carers	3	6	1	0	0	10
Total	19	33	13	6	9	80
Percentage	24%	41%	16%	8%	11%	100%

As in Table 1 the overall response to the proposals is still positive with strongly agree and agree being the combined highest score amongst the Council Tax Reduction customers.

As we only had 45 people respond to the consultation and out of those only 10 are in receipt of Council Tax Reduction the findings cannot be viewed as a clear representation of the views of the people that could be affected by these proposals.

The GLA sent an email on 11/12/24 in response to our consultation. The GLA understand that the final scheme design is a local decision for Hillingdon but considers any changes to the scheme should be based on a comprehensive analysis of household capability to pay increased obligations. They advise that changes to the scheme should be designed to safeguard against non-collection, minimise household debt and ensure optimal revenue generation. They recommend that we consider the impact on various socio- economic populations and that this could assist us with identifying household most vulnerable to increases in household debt.

The GLA note that proposals 1 and 6 could result in significant increases in bills for a limited number of households and that if implemented would need to be monitored. They express their specific support for proposal 8 which is the additional support for care leavers up to age 21.

The GLA welcomes the fact we have published scenarios setting out the impact of the changes and advise it is important that this is replicated when we publish our final scheme. They have advised that we should also publish a clear analysis of additional costs and savings we expect to materialise from the final scheme.

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

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.

The Council Tax Reduction Scheme is costing more than expected due to the increase in households falling within the vulnerable band.

As the pension age scheme is governed nationally, we are unable to make any amendments to this part of the scheme.

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):

Equality Group	Impact on this group and actions you need to take
People with a disability	<p>Proposal 1 directly affects this group as it aims to align the support given to disabled households with that of households where there is no disability.</p> <p>We will monitor the effect of this change and any impact it has on these households.</p> <p>Section 13a will be considered for those that are struggling financially because of this proposal.</p>
Women	<p>66% of our caseload is women and therefore any changes to the scheme generally have more of an impact on this group.</p> <p>The impact of some of the changes are proportionate to the overall split but proposal 7 to increase the non-dependant from £8.00 to £10.00 effects an extra 10% of women when compared with the overall split.</p> <p>We will monitor the effect of this change and any impact it has on these households.</p> <p>Section 13a will be considered for those that are struggling financially because of this proposal.</p>
Men	<p>34% of our working age caseload is men. Most of the changes affect this group proportionately, however, proposal 6 impacts 44% of men. This is an increase of 10%.</p> <p>We will monitor the effect of this change and any impact it has on these households.</p> <p>Section 13a will be considered for those that are struggling financially because of this proposal.</p>

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

Equality Group	Impact on this group and actions you need to take
Service users who are care leavers	<p>The change in proposal 8 will have a positive impact on this group as more financial support will be provided up to the age of 21 to help these care experienced young</p>

	people have more time to learn how to budget and manage their finances.
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D) Conclusions

Whilst the proposed changes to the scheme may have a detrimental impact on various groups based on disability and sex, the changes are intended to align the scheme and aim to reduce the overall cost.

The proposals will have a positive impact on care leavers who will gain more financial support up to the age of 21.

Due to the limitations of what is governed nationally, a variety of local scheme options were considered. These included removing the older person’s discount and increasing the Council Tax reduction percentage for the out of work band. Although these options were rejected at the time, they may be considered in the future.

Information regarding the changes will be published on our website and support will be available and provided to all service users when the new Council Tax Reduction is calculated.



Signed and dated:

06/01/25

Name and position: Tiffany Boreham, Head of Revenues and Benefits