



## Appendix 1

# 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 has been updated in 2023 and 2025 with various changes such as the weekly non-dependent deduction and the minimum weekly award amount.

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 3 proposals to change the banding scheme from 01/04/2026 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.

The proposals are:

1. Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)
2. Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.
3. Increase the non-dependant deduction from £10 to £12 per week.

Those eligible under the 'vulnerable scheme' are in receipt of a disability benefit such as Personal Independence Payment (PIP), Disability Living Allowance (DLA) or registered blind.

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

Steve Muldoon, Corporate Director of Finance

Date assessment completed and approved by accountable person

06/01/26

Names and job titles of people carrying out the assessment

Tiffany Boreham, Head of Revenues and Benefits

Vicky Trott, Inclusion and Wellbeing Manager

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. Aligning the vulnerable scheme with the standard scheme, and;
2. Reducing the overall cost of the scheme.

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

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

Our current caseload is 15,976 which includes 10,947 working age households. Our pensioner caseload is protected and will not be affected by any of these changes.

Working age caseload equalities data

Sex

Male	3548	32%
Female	7399	68%
Total	10947	100%

68% of the claimants within the working age scheme are female.

### Ethnicity

Not completed/Any other	7027	64.2%
White British	2300	21%
European other	233	2.1%
Asian and White	27	0.2%
Black African and White	1	0.01%
Black Caribbean	51	0.5%
Black Caribbean and White	13	0.1%
Black African	238	2.2%
Black other	124	1.1%
Irish	85	0.8%
Indian	89	0.8%
Pakistani	71	0.6%
Bangladeshi	30	0.3%
Chinese	8	0.07%
Asian or Asian British: Bangladeshi	31	0.3%
Asian or Asian British: Indian	107	1%
Asian or Asian British: Pakistani	93	0.9%
Asian or British: Any other Background	127	1.2%
Black-Black British: African	222	2%
Black-Black British: Caribbean	67	0.6%
Travellers	3	0.02%
Total	10947	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 or not.

### Disability

Disabled	6476	59%
Not disabled	4471	41%
Total	10947	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?

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

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, 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 may potentially have an impact on their income and socio-economic status.

We acknowledge that in the absence of 64% 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 - Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)

This proposal would have a negative impact on the households where someone has a disability **and** a non-dependant living in the property where no deduction is currently being taken. A deduction would be applied to 2080 non dependants living in households considered vulnerable under the CTR scheme. This proposal may

therefore have a disproportionately negative impact on this group.

Proposal 2 - Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.

This proposal would have a negative impact on the 6476 households where someone has a disability which equates to 59% of our caseload.

Of those claimants who have a disability:

<b>Male</b>	<b>2166</b>	<b>33%</b>
<b>Female</b>	<b>4310</b>	<b>67%</b>
<b>Total</b>	<b>6476</b>	<b>100%</b>

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

This proposal may therefore have a disproportionately negative impact on women with a disability.

Proposal 3 - Increase the non-dependant deduction from £10 to £12 per week

This proposal would have an impact on the vulnerable households where no deduction is currently being taken and the households where a deduction is currently being taken at £10.00 per week.

Of those 1398 claimants:

<b>Male</b>	<b>431</b>	<b>31%</b>
<b>Female</b>	<b>967</b>	<b>69%</b>
<b>Total</b>	<b>1398</b>	<b>100%</b>

This proposal may therefore have a disproportionately negative impact on female claimants specifically those with a disability.

## 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 21/10/25 for 6 weeks and closed at midnight on 01/12/25.

During the 6 weeks we received 26 responses to our proposals.

To promote the consultation, we contacted CAB 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 26 responses 18 were from females, 4 were from males and 4 preferred not to state their sex.

<b>Sex</b>	
Male	4
Female	18
Prefer not to say	4

The majority of responses were from people over 45 years of age

<b>Age range</b>	
25-34	5
35-44	0
45-54	6
55-64	6
65+	2
Prefer not to say	7

Most of the responses were from within Hillingdon with only 1 being left blank

<b>Postcode</b>	
HA4	7
UB10	7
UB3	1
UB4	2
UB7	3
UB8	4
UB9	1
Blank	1

Out of the 26 responses 11 confirmed they had a disability.

<b>Disability Yes/No</b>	
Yes	11
No	12
Prefer not to say	3

The majority of respondents were from a white group or background

<b>Ethnicity group or background</b>	
Mixed or multiple ethnic group or background	2
Prefer not to say	8
White group or background	16

Only 9 customers that responded to the consultation confirmed they were in receipt of Council Tax Reduction.

<b>CTR Yes/No</b>	
Yes	9
No	17

The majority of responses were from customers who did not have a non-dependant living with them

<b>Non-dependant Yes/No</b>	
Yes	6
No	19
Blank	1

#### Responses to each Proposal

The 3 proposals that we consulted on were to

1. Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)
2. Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.
3. Increase the non-dependant deduction from £10 to £12 per week.

Table 1 - Breakdown of responses

<b>Response</b>	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>	<b>Total</b>
Apply the standard £10.00 non dep deduction to the vulnerable group	3	3	3	5	10	2	26
Align the vulnerable group	5	3	2	3	11	2	26
Increase the	3	4	1	7	9	2	26



non dep deduction to £12.00							
<b>Total</b>	<b>11</b>	<b>10</b>	<b>6</b>	<b>15</b>	<b>30</b>	<b>6</b>	<b>78</b>
<b>Percentage</b>	<b>14%</b>	<b>13%</b>	<b>8%</b>	<b>19%</b>	<b>38%</b>	<b>8%</b>	<b>100%</b>

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

**Table 2 - Breakdown of responses from the 9 residents in receipt of Council Tax Reduction**

<b>Response</b>	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>	<b>Total</b>
Apply the standard £10.00 non dep deduction to the vulnerable group	1	0	2	0	5	1	9
Align the vulnerable group	1	0	0	1	6	1	9
Increase the non dep deduction to £10.00	0	0	1	2	5	1	
<b>Total</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>16</b>	<b>3</b>	<b>27</b>
<b>Percentage</b>	<b>8%</b>	<b>0</b>	<b>11%</b>	<b>11%</b>	<b>59%</b>	<b>11%</b>	<b>100%</b>

As in Table 1 the overall response to the proposals is still negative with strongly disagree being the highest score amongst the Council Tax Reduction customers.

As we only had 26 people respond to the consultation and out of those only 9 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 01/12/25 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 welcomes the fact we have published a detailed consultation documentation which outlines how the changes being proposed could affect working age CTR customers. They have advised that we should also make a judgement as to the forecast collection rates from those claimants and council tax payers affected

by any changes to our 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

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):**

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>People with a disability</b>	<p>Proposals 1 and 2 directly affects people who share this characteristic as the proposals aim to align the support given to disabled households with that of households where there are no disabled residents.</p> <p>Implementing proposal 3 at this time will also potentially affect the ability of this group to pay their council tax which may have an impact on debt recovery.</p> <p>We will monitor the effect of this change and any impact it has on this group.</p> <p>Section 13a will be considered for those that are struggling financially because of this proposal.</p>
<b>Women with a disability</b>	<p>Proposals 1 and 2 directly affects people who share these characteristics as the proposals aim to align the support given to disabled households with that of</p>

	<p>households where there are no disabled residents and women make up 68% of this cohort.</p> <p>Implementing proposal 3 at this time will also potentially affect the ability of this group to pay their council tax which may have an impact on debt recovery.</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>
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C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>N/A</b>	There are no clear positive impacts

## D) Conclusions

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

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:**

06/01/26

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