**SSA EQUALITY IMPACT AND NEEDS ANALYSIS**

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| **Directorate** | **Resources** |
| **Service Area** | **Revenues & Benefits** |
| **Service/policy/function being assessed** | **Council Tax Reduction Scheme** |
| **Which borough (s) does the service/policy apply to** | Richmond |
| **Staff involved** | **Graham Russell, Aveen Kelly** |
| **Date approved by Policy and Review Manager**All EINAs must be signed off by the Policy and Review Manager | 31/08/18 |

**SUMMARY**

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| **Please summarise the key findings of the EINA.** The proposed change to the scheme will increase the amount of CTR which non-vulnerable working age applicants will receive with effect from 1st April 2019.Previous EINAs identified that when the 95% and 85% limits were introduced, they disproportionately affected women and families with children. The proposed change reverses these impacts. |

1. **Background**

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| **Briefly describe the service/policy or function:** The Council Tax Reduction (CTR) scheme came into being on 1st April 2013 and replaced the existing Council Tax Benefit scheme. It is a means tested discount, designed to help low income households with their Council Tax.Each Local Authority was required to design a scheme for working age households, whilst the Government proscribed the regulations to be used for those of pensionable age. As a result, residents over the age of 65 cannot be adversely affected by any changes made by the London Borough of Richmond upon Thames (LBRuT) to the scheme.LBRuT’s CTR scheme currently includes protection for the most vulnerable households. This protection can be given where a member of the household is in receipt of certain disability benefits and also includes carers and households who receive a Council Tax reduction for disability.Council Tax Support is limited at Band E meaning that recipients in Band F, G or H properties receive support as if they were in a Band E property.In 2016/17, the Council imposed a change which meant that applicants’ CTR was calculated on 95% of their total Council Tax liability. This was followed in 2017/18 with a further change meaning that CTR was calculated on 85% of Council Tax Liability.This EINA is in respect of a proposed change to the CTR scheme that would affect only working age applicants who are not treated as vulnerable.The proposal is that all working age, non-vulnerable applicants will have their CTR calculated on 100% of their Council Tax liability. |

1. **Analysis of need and impact**

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| **Protected group** | **Findings** |
| **Age** | The total number of residents in LBRuT (based on the mid-2017 ONS estimate) is 195,680.

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| **Age** | **% of LBRuT** | **% of CTR recipients** | **Difference** |
| 0-20 | 25.6 | 0.3 | -25.3 |
| 21-30 | 9.8 | 7.3 | -2.5 |
| 31-40 | 15.8 | 14.0 | -1.8 |
| 41-50 | 16.7 | 16.1 | -0.6 |
| 51-60 | 12.9 | 16.6 | 3.7 |
| 61+ | 19.2 | 45.7 | 26.5 |

Older people are disproportionately likely to be CTR recipients, although the majority of these applicants will be protected from the proposed changes to the scheme.**Older people:**Based on claimant information as at August 2018, there are 3,287 Pensionable Age recipients of CTR. This is 39% of total claimants. Claimants of pensionable age are protected by Government regulation from any changes introduced by LBRuT. **Children and young people:**Latest data (2017 ONS) estimates that there are 48,677 residents aged under 20 in the borough, analysed as follows:

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| **Age** | **Residents** | **% of LBRuT population** |
| 0-4 | 12,982 | 6.6 |
| 5-9 | 14,363 | 7.3 |
| 10-14 | 11,737 | 6.0 |
| 15-19 | 9,595 | 4.9 |
| **0-19** | **48,677** | **24.9** |

**Recipients with children:**Under the current CTR scheme, families with children receive additional premiums to reflect their needs. Child Benefit is completely disregarded in the assessment of income and lone parents receive additional income disregards. Plus note re other changes re no of childrenApproximately 61% of working-age recipients of CTR are families with one or more dependent children. This equates to 1,575 families with 2,859 children.  |
| **Disability** | From the 2011 census, 21,447 residents (11.5% of the total population) stated they had a long-term health problem or disability that affected their day-to-day life. 2.0% of those aged between 16 and 74 stated that they were permanently sick or disabled (i.e. not able to work).The current protection offered to applicants receiving disability benefits would continue which should mitigate the impact of the proposed changes.Carers would also continue to receive protection. |
| **Gender (sex)** |

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|  | **Male** | **Female** |
| LBRuT residents | 48.6% | 51.4% |
| All CTR recipients | 37.9% | 62.1% |
| Working-age CTR recipients | 32.7% | 67.3% |

Women are disproportionately represented amongst the current caseload making up 67.3% of Working Age recipients as opposed to 51.4% of the overall population.Of those recipients likely to be affected by the proposals (2,596), 1,748 (67%) are women.Although the policy change is applied universally, women would benefit from this policy change in greater numbers. |
| **Gender reassignment** | No impact is envisaged for this protected characteristic as the gender of the applicant is not required as part of the assessment process for CTR. |
| **Marriage and civil partnership** | No impact is envisaged for this protected characteristic as this information is not required as part of the assessment process for CTR. |
| **Pregnancy and maternity** | Data regarding pregnancy and maternity status is not required, except when a relevant state benefit or maternity is being received. This means we cannot accurately assess the number of households within this category.Applicants leaving or reducing work as a result of pregnancy or maternity will see a greater increase in CTR as a result of their reduced earnings than previously |
| **Race/ethnicity** | Very limited information is held on the ethnic breakdown of current applicants as this information is not required as part of the assessment process for CTR. It is therefore difficult to estimate the impact on this group – however, the proposed policy change would have a positive impact on current and future CTR applicants, regardless of ethnicity, as they would receive more CTR than previously |
| **Religion and belief, including non belief** | According to the 2011 Census the following proportions of the population consider themselves to be of the following religions or beliefs

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| **Religion/belief** | **%** |
| Christian | 55.3 |
| No religion | 28.4 |
| Muslim | 3.3 |
| Hindu | 1.6 |
| Jewish | 0.8 |
| Sikh | 0.8 |
| Other | 0.4 |
| None stated | 8.2 |

 No specific data is collected on this characteristic as part of the assessment process for CTR. |
| **Sexual orientation** | The 2011 census did not have a specific question regarding sexual orientation, but found that 665 people (0.35% of the Borough population) reported being in a same sex Civil Partnership.Beyond Richmond, surveys found that 1.5% of the national population and 2.5% in London consider themselves LGB[[3]](https://www.datarich.info/groups-and-communities/sexual-orientation/%22%20%5Cl%20%22_edn3); and a government report estimated that between 5% and 7% of the population in England and Wales is LGB[[4]](https://www.datarich.info/groups-and-communities/sexual-orientation/%22%20%5Cl%20%22_edn4). A conservative estimate (5%) equates to 9,500 people in Richmond. However, some local organisations suggest an estimate of 10%, equating to 19,000 people, is more realistic. No specific data is collected on this characteristic as part of the assessment process for CTR. |
| **Across groups i.e older LGBT service users or bme young men** | From the analysis above no cross-cutting impacts are identified. |

1. **Impact**

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| **Protected group** | **Positive** | **Negative** |
| **Age** | Pensioners are protected from the impact of changes to the scheme by Government regulation.Working age claimants will benefit from the proposed change and there are 1,575 families with 2,859 children within this group. | *None identified* |
| **Disability** | None identified – current protection offered to applicants receiving disability benefits and to carers will continue. | *None identified* |
| **Gender (sex)** | Women are disproportionately represented amongst the current caseload. Therefore, although the policy change is applied universally, women would benefit from this policy change in greater numbers. | *None identified* |
| **Gender reassignment** | *None identified* | *None identified* |
| **Marriage and civil partnership** | *None identified* | *None identified* |
| **Pregnancy and maternity** | Applicants leaving or reducing work as a result of pregnancy or maternity will see a greater increase in CTR as a result of their reduced earnings than previously. | *None identified* |
| **Race/ethnicity** | *None identified* | *None identified* |
| **Religion and belief, including non belief** | *None identified* | *None identified* |
| **Sexual orientation** | *None identified* | *None identified* |

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| **Action** | **Lead Officer** | **Deadline** |
| Public Consultation process | Graham Russell | December ‘18 |

1. **Consultation. (optional section– as appropriate)**

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|  The Council will write to all current working age recipients inviting them to take part in the consultation.The wider public will be able to access the consultation via the Council’s website.We will also invite advocacy groups / welfare organisations etc. e.g. Citizens Advice Richmond, Richmond Housing Partnership to take part in the consultation |