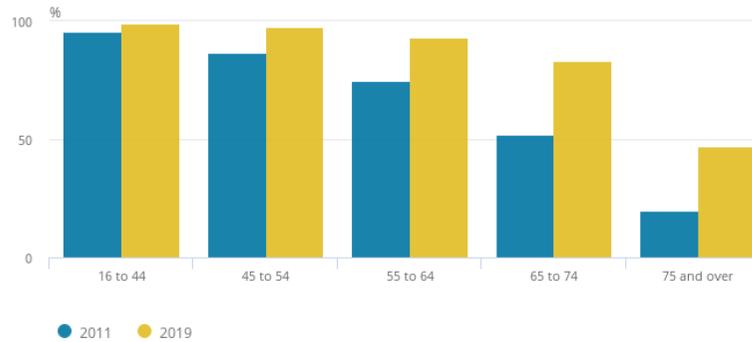


Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	The proposed scheme will begin in the year 2021-22.
Name and details of policy, strategy, function, project, activity, or programme	<u>New Council Tax Reduction Scheme</u> A proposal to introduce a “banded income” Council Tax Reduction scheme for Universal Credit recipients from 1 April 2021.
Lead Officer	Name: Andrew Wilson Position: Benefits Service Training and Welfare Reform Manager Email: andrew.wilson@rbkc.gov.uk Telephone No: 077 393 16098
Other associated documentation	“Analysis of stakeholder consultation”
Date of completion of final EIA	23/9/20

Section 02	Scoping of Full EIA
Plan for completion	Timing: by 25/9/20 Resources: Andrew Wilson

Analyse the impact of the policy, strategy, function, project, activity, or programme	Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.		
	Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
	Age	<p>The proposal only directly affects residents of “working-age” (i.e. age 18 to approximately 66).</p> <p>Our proposal is designed to meet a legitimate aim of improving the Council Tax service for people on Universal Credit.</p> <p>This proposal is not about “channel shift” – i.e. shifting more people towards accessing the service on-line. However, because the proposed scheme is accessible on-line (as is the current scheme), it seems appropriate to comment on this point here.</p> <p>Generally, older people use the internet less than younger people (although internet use among older people is increasing quickly, as shown in the graph below).</p>	Neutral/ positive



Source: Office for National Statistics - Labour Force Survey

Increase in internet use for different age groups in UK, 2011 to 2019

Within our cohort (working-age people), there is a high proportion of people at the upper age of the age range: 28% are over 55 years old.

ONS data in 2019 showed that 93.2% of people aged 55-64 had used the internet recently. This is lower, but not much lower, than people age 45-54 (97.5%) and people age 16 – 44 (99.2%). So, in generally terms, internet use among all working-age people is very high.

For those unable to access the internet, Council Tax Reduction can still be claimed using a paper form, and there is no plan to change this.

Disability

Academic research¹ states 18% of Britain’s working-age population is disabled, In RBKC, 17.2% of households on Universal Credit have the Limited Capability for Work Element (Feb 2020). This is above the national average of 14.5%. In the proposed scheme, Elements of Universal Credit for disability are disregarded as income, which will have a positive financial impact on working people in this group. Non-working people will receive full Council Tax Reduction under this

Neutral/
positive

		<p>proposal, which is the same as the current scheme, so the impact on them is neutral.</p> <p>In terms of accessibility, under this proposal, Council Tax Reduction can be claimed on-line or by form through the post. We can also help people on our dedicated phone line. These are the same arrangements as at present, so for accessibility, the impact is neutral.</p> <p>¹https://www.st-andrews.ac.uk/hr/edi/disability/facts/</p>	
	Gender reassignment	<p>The Government estimates that between 0.3 to 0.75 per cent of the UK population have a different gender to the one assigned to them at birth (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721642/GEO-LGBT-factsheet.pdf) . We have no data for our Universal Credit cohort. However, there is no part of our proposal that is likely to give different or unfavourable outcomes for this group.</p>	Neutral/positive
	Marriage and civil partnership	<p>Our Council Tax Reduction recipients who are on Universal Credit fall into the following groups:</p> <p>11% Couples</p> <p>21% Lone parents</p> <p>68% Single people</p> <p>These proportions may change as more people move on to Universal Credit.</p> <p>We are not able to distinguish between married and un-married couples in our data.</p> <p>Couples who are married or who have entered into a civil partnership are treated the same as an unmarried couple by the proposal.</p>	Neutral/positive

	Pregnancy and maternity	In welfare benefits (generally), the unborn child is not treated as a child until he or she is born. Therefore, a pregnant woman cannot acquire the Child Element of Universal Credit for her child until her child is born. As our proposal follows the family composition as recorded by Universal Credit, this gives the same outcome as our current Council Tax Reduction scheme.	Neutral/positive																	
	Race	<p>The London unemployment rate is 4.3% (ONS, Dec 2019). But for BAME people, the unemployment rate is higher (6.8% Sept 2019, ONS). We have no equivalent data explicitly for RBKC, but it is reasonable to assume that this trend is continued in RBKC. Nevertheless, the proposal does not impact unemployed people, as (under the proposal) they get “maximum Council Tax Reduction”, as they do with the current scheme. The impact of the proposal is upon people in employment with low or moderate levels of pay. However, our own data suggests there is no statistically significant different profile between benefit applicants who are unemployed and benefit applicants who are employed, based on race.</p> <p>We only have incomplete data for our own customers (as 60% of our customers do not fill-in the equalities monitoring questionnaire when they claim Council Tax Reduction). For those that do, this is the data, with the 2011 Census data for comparison:</p> <table border="1"> <thead> <tr> <th></th> <th>RBKC UC-CTR customers</th> <th>2011 Census RBKC</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>45%</td> <td>70%</td> </tr> <tr> <td>Mixed</td> <td>8%</td> <td>6%</td> </tr> <tr> <td>Asian/Asian British</td> <td>19%</td> <td>10%</td> </tr> <tr> <td>Black/Black British</td> <td>11%</td> <td>7%</td> </tr> <tr> <td>Other ethnic group</td> <td>17%</td> <td>7%</td> </tr> </tbody> </table>		RBKC UC-CTR customers	2011 Census RBKC	White	45%	70%	Mixed	8%	6%	Asian/Asian British	19%	10%	Black/Black British	11%	7%	Other ethnic group	17%	7%
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		<p>The data suggests that Black, Asian and minority ethnic people are more likely to be receiving Council Tax Reduction in RBKC, than a White person. Therefore, any proposal concerning Council Tax Reduction impacts Black, Asian and minority ethnic people disproportionately.</p> <p>The proposal is designed to provide a better Council Tax service, so we believe that this impact is positive on people in work, and neutral for residents who do not work.</p>																		
	Religion or belief	<p>We do not gather data about religion for benefit customers.</p> <p>The 2011 Census data is shown below for reference:</p> <table border="1" data-bbox="848 679 1610 1230"> <thead> <tr> <th></th> <th>2011 Census RBKC</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>54%</td> </tr> <tr> <td>Buddhist</td> <td>2%</td> </tr> <tr> <td>Hindu</td> <td>1%</td> </tr> <tr> <td>Jewish</td> <td>2%</td> </tr> <tr> <td>Muslim</td> <td>10%</td> </tr> <tr> <td>Sikh</td> <td>0.1%</td> </tr> <tr> <td>Other</td> <td>0.5%</td> </tr> <tr> <td>No religion</td> <td>21%</td> </tr> </tbody> </table> <p>There is no part of our proposal that is likely to give different outcomes for any particular religion.</p>		2011 Census RBKC	Christian	54%	Buddhist	2%	Hindu	1%	Jewish	2%	Muslim	10%	Sikh	0.1%	Other	0.5%	No religion	21%
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	Sex	<p>11% of our claims are from couples (see above). We have no data on how many of these are from same-sex couples.</p> <p>Of the remaining Council Tax Reduction claims, 61% are from women, and 39% are from men.</p> <p>Women therefore are more highly represented than men. The proposed scheme treats men and women the same, as does the current scheme.</p>	Neutral/positive
	Sexual orientation	No available data, though the borough's LGBT population is estimated by the ONS as constituting around six per cent of the population equating to 10,716 people.	Neutral/positive

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	We have used data available in the public realm, including the Office for National Statistics (ONS), as well as anonymised data from our own records.
New research	No additional research has been undertaken, except for the consultation (see below).

Section 04	
Consultation	There was a six-week public consultation which ended on 13/9/20. 2,956 questionnaires were posted to all the

	<p>people who are currently on Universal Credit and Council Tax Reduction. The questionnaire was also available on the council's website.</p> <p>We also consulted with advice agencies and the Greater London Authority.</p>
<p>Analysis of consultation outcome</p>	<p>The detailed analysis of the consultation responses (“Analysis of stakeholder consultation”) is at Appendix 5.</p> <p>In summary, there were 144 replies:</p> <ul style="list-style-type: none"> • 77% of respondents agreed that the Council should address the issue of fluctuating Universal Credit, whilst only 4% disagreed • Of those that think the council should address the issue, the majority (84 per cent) thought the banded income scheme is the best way to do this • 68% of respondents felt that the Council should introduce the banded income scheme for Universal Credit recipients in April 2021 to address the issue of fluctuating Universal Credit on Council Tax payments, whilst 32% felt the council should ‘continue with the current scheme without any changes’. <p>Some information about the respondents was collected with the consultation responses:</p> <p>55% of respondents were female, and 39% male (5% preferred not to say). This corresponds with our gender data outlined above.</p> <p>41% of respondents said they were from a BAME background, compared with 55% in our data above. 34% said they were from a white background, and 24% preferred not to say.</p> <p>42% of the respondents said they had a long-term illness, health problem, or disability, a higher percentage those who have the Limited Capability for Work Element of Universal Credit (17.2%). This may suggest that people with illnesses and disabilities were more likely to respond to the survey than those who do not, perhaps reflecting how important they see Council Tax support as being to them.</p> <p>39% of the respondents were over 55 years old, compared with 28% in our data, as outlined above. This may</p>

	<p>suggest that older people were more likely to respond to the consultation, perhaps suggesting that they see Council Tax support as very important to them.</p> <p>The consultation gives some evidence that people find the proposal complex and/or confusing. Although there is good support for the proposal (77% of respondents said the Council should address the problem [of fluctuating income], and 68% of all respondents said a banded income scheme was the best way to do this), a significant minority were less certain:</p> <ul style="list-style-type: none"> • 26 respondents said they did not know whether it was right to address the problem • 17 of the respondents who did agree that the problem should be addressed, disagreed that a banded scheme was the best way to address it, or did not know • 41 respondents said we should continue with the current scheme • 9 respondents made commented that they felt they did not know enough to say whether the banded scheme was the right solution. <p>The proposed scheme is new to people and may well appear to be relatively complex, especially to someone for whom English is not their first language (the consultation documents were published only in English). We know that 20% of all households in RBKC have a first language that is not English (the fourth highest proportion in the country), and half of all people living in RBKC are born outside the UK.</p>
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Section 05	Analysis of impact and outcomes
Analysis	<p>Financially, no one will be left worse-off by the new scheme, compared with the current scheme. There will be a transitional protection scheme with no time limit, to ensure that no-one is worse off. People who are working will usually receive more Council Tax Reduction under the proposal than the current scheme, and families and disabled people in work will receive significantly more. Furthermore, by solving the problem of multiple bills, all Council Tax payers on Universal Credit will potentially benefit from this proposal.</p> <p>But there is some evidence that the scheme is difficult to understand.</p> <p>There is also evidence that suggests that people with disabilities may be more concerned than the general</p>

	population about a change to the scheme.
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Section 06	Reducing any adverse impacts and recommendations					
Outcome of Analysis	<p>If the new scheme is introduced, we need to help people to understand it. During the consultation, a dedicated phone number was available for people to ask questions. This facility needs to be continued if the new scheme is introduced. Staff on this line need to be confident about how to get help to translate information and explanations through interpreters or translators.</p> <p>People on Universal Credit who are not working because of illness or disability will receive 100% Council Tax Reduction. Disabled people who are working will receive more Council Tax Reduction than under the current scheme. We need to present these facts more clearly, so that disabled people are confident about how the proposed scheme would work.</p> <p>We need to review our materials which explain the scheme, and also work with community groups who support our residents.</p> <p>Advice agencies were concerned that some residents have patterns of earnings do not work well with Universal Credit, and would adversely impact Council Tax payments, even if the Council Tax Reduction scheme is changed. We propose to enhance the Council Tax discretionary relief policy. A paragraph has been added to the policy which gives the council discretion to write-off Council Tax arrears which are caused by the way the CTR scheme has treated fluctuating earnings in individual cases.</p>					

Section 07	Action Plan					
Action Plan						
	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan

	Information	Phone line	November 2020	Andrew Wilson	Residents who call will receive and understand the information they seek	23/9/20
	Clarity	Simple, clear information to be made available about the scheme	December 2020	Andrew Wilson	The main concepts of the proposed scheme are understood	23/9/20
	Support	Contact community groups	January 2021	Andrew Wilson	Staff and volunteers at community groups can support residents	23/9/20
	Non-standard earnings pattern	Enhance the discretionary policy	April 2021	Andrew Wilson	Exceptional cases can be addressed	23/9/20

Section 08	Agreement, publication and monitoring
Chief Officers' sign-off	Name: Position: Email: Telephone No:
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 17/9/20 Key equalities issues have been included: Yes
Lead Equality Manager (where involved)	Name: Angela Chaudhry Position: Corporate Equalities Officer Date advice / guidance given: 15/9/20 Email: angela.chaudhry@rbkc.gov.uk

