

# SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Resources</b>
<b>Service Area</b>	<b>Technical Resources</b>
<b>Service/policy/function being assessed</b>	<b>Richmond Council Tax Reduction Scheme</b>
<b>Which borough (s) does the service/policy apply to</b>	<b>Richmond</b>
<b>Staff involved in developing this EINA</b>	<b>Grace Vinter, Peter Forde, Nichola Obande</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	
<b>Date submitted to Directors' Board</b>	

## 1. Summary

### Current Council Tax Reduction Scheme

From 1 April 2013, Council Tax Benefit was replaced by localised schemes. In Richmond this is called the Council Tax Reduction (CTR) scheme.

CTR is to help people who are on a low income to pay part or all their Council Tax. The Government requires us to protect the claiming process for pension age claimants so there are two CTR schemes in place:

- The prescribed scheme for Pensioners
- Richmond's Local CTR scheme for Working Age Claimants

Currently the Council calculates CTR through a Means Tested benefit scheme using government set rates which are amended annually. The maximum Council Reduction that can be received is capped at Council Tax Band E value (2,766.70). Claimants in Properties Band F, G, or H the maximum reduction that can be receive is Band E.

### Proposed changes to the CTR

It is proposed that an **Income banded** scheme is implemented in place of the current Means Tested scheme to take into consideration that working aged people in receipt of legacy benefits such as Housing Benefits, will migrate over to Universal Credit.

This EINA looks at the impact of the program for the protected characteristics groups

The key findings from the EINA are:

- Around 7% of claimants may experience adverse effects due to the changes, to mitigate against this.

The following actions are proposed to mitigate the impact of the policy change

- The Council is proposing to offer Multiyear Transitional protection, potentially up to 3 years

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Current CTR Caseload	Civica and Northgate Report
Age, Disability, Sex, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Religion and Belief, Sexual Orientation, and socio-economic characteristic groups.	ONS Census
Number of people claiming CTR	Internal Caseload Data
Deprivation	English Indices of Deprivation 2019

b. Who have you engaged and consulted with as part of your assessment?

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
Richmond Residents	Consultation engagement due to commence on 15/11/2024	15/11/2024	

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected group	Findings																			
Age	<table><tr><th>Age</th><th>Borough Population</th><th>CTR Caseload</th><th>No. of households claiming CTR</th></tr><tr><td>0 to 17 –</td><td>22.5%</td><td>0%</td><td>ND</td></tr><tr><td>18 to 65 –</td><td>62.3%</td><td>62.7%</td><td>7,998</td></tr><tr><td>66 and over –</td><td>15.2%</td><td>37.3%</td><td>2,986</td></tr></table>				Age	Borough Population	CTR Caseload	No. of households claiming CTR	0 to 17 –	22.5%	0%	ND	18 to 65 –	62.3%	62.7%	7,998	66 and over –	15.2%	37.3%	2,986
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	In Richmond Borough 7,998 households receive Council Tax Reduction. Of these, 5,012 are households aged 18 -65.																			
	2986 people in the borough currently receive CTR are over 66.																			
The percentage of the proportion of people receiving council tax reduction aged 66+ is over two times higher than the general borough population.																				

Disability	In the 2021 Census, 12% of the borough population reported that they had a disability or health problem which affects their day-to-day life.  2,056 households in the borough are considered vulnerable and can receive up to 100% support towards their Council Tax Reduction, this is higher than the general borough population with a disability.															
Sex	<table><tr><th>Sex</th><th>Borough Population</th></tr><tr><td>Male</td><td>48%</td></tr><tr><td>Female</td><td>52%</td></tr></table>  While CTR data is not disaggregated by sex, approximately 24.1% of females in the borough work part time compared to 19.6% of males. This is likely to mean that their annual incomes are lower and are more likely to be eligible for the proposed CTR scheme.		Sex	Borough Population	Male	48%	Female	52%								
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Gender reassignment	<table><tr><th>Gender Identity</th><th>Borough Population</th></tr><tr><td>Gender identity the same as sex registered at birth -</td><td>94%</td></tr><tr><td>Not answered –</td><td>5.6%</td></tr><tr><td>Gender identity different from sex registered at birth but no specific identity given –</td><td>0.1%</td></tr><tr><td>Trans Woman –</td><td>0.1%</td></tr><tr><td>Trans man –</td><td>0.1%</td></tr><tr><td>All other gender identities –</td><td>0.1%</td></tr></table> <b>Data on gender identity of CTR claimants not currently recorded.</b>		Gender Identity	Borough Population	Gender identity the same as sex registered at birth -	94%	Not answered –	5.6%	Gender identity different from sex registered at birth but no specific identity given –	0.1%	Trans Woman –	0.1%	Trans man –	0.1%	All other gender identities –	0.1%
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Marriage and civil partnership	<table><tr><th>Marital Status</th><th>Borough Population</th></tr><tr><td>Never Married and never registered a civil partnership</td><td>49.5%</td></tr><tr><td>Married or in a registered Civil Partnership</td><td>35.9%</td></tr><tr><td>Separated but still legally married or still legally in a Civil partnership</td><td>1.9%</td></tr><tr><td>Divorced or Civil Partnership dissolved</td><td>8.0%</td></tr><tr><td>Widowed or Surviving Civil partnership partner</td><td>4.7%</td></tr></table> <b>Data on marital status of CTR claimants not currently recorded.</b>		Marital Status	Borough Population	Never Married and never registered a civil partnership	49.5%	Married or in a registered Civil Partnership	35.9%	Separated but still legally married or still legally in a Civil partnership	1.9%	Divorced or Civil Partnership dissolved	8.0%	Widowed or Surviving Civil partnership partner	4.7%		
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Pregnancy and maternity	The 2021 Census recorded that in Richmond there were 19.2 births per 1,000 females (15-44). <b>Data on pregnancy/maternity for CTR claimants not currently recorded.</b>																					
Race/ethnicity	<table><tr><th>Ethnicity</th><th>Borough Population</th></tr><tr><td>Asian / Asian British or Asian Welsh -</td><td>17,467</td></tr><tr><td>Black/ African/ Caribbean/ Black British</td><td>3,687</td></tr><tr><td>Mixed/multiple ethnic group</td><td>10,662</td></tr><tr><td>Other ethnic group</td><td>6,350</td></tr><tr><td>White</td><td>157,111</td></tr></table> <b>Data on ethnicity of CTR claimants not currently recorded.</b>		Ethnicity	Borough Population	Asian / Asian British or Asian Welsh -	17,467	Black/ African/ Caribbean/ Black British	3,687	Mixed/multiple ethnic group	10,662	Other ethnic group	6,350	White	157,111								
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Religion and belief, including non belief	<p>ONS Census 2021</p> <table><tr><th>Religion/Belief</th><th>Borough Population</th></tr><tr><td>Buddhist</td><td>0.8%</td></tr><tr><td>Christian</td><td>45.3%</td></tr><tr><td>Hindu</td><td>2.1%</td></tr><tr><td>Jewish</td><td>0.6%</td></tr><tr><td>Muslim</td><td>4.3%</td></tr><tr><td>Sikh</td><td>1%</td></tr><tr><td>Other</td><td>0.7%</td></tr><tr><td>No religion</td><td>38%</td></tr><tr><td>Not Answered</td><td>7%</td></tr></table> <b>Data on religion/belief of CTR claimants is not currently recorded.</b>		Religion/Belief	Borough Population	Buddhist	0.8%	Christian	45.3%	Hindu	2.1%	Jewish	0.6%	Muslim	4.3%	Sikh	1%	Other	0.7%	No religion	38%	Not Answered	7%
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Sexual orientation	<table><tr><th>Sexual Orientation</th><th>Borough Population</th></tr><tr><td>Straight or Heterosexual –</td><td>89%</td></tr><tr><td>Not answered –</td><td>7.6%</td></tr><tr><td>Gay, Lesbian, Bisexual or other (LGB+)</td><td>3.4%</td></tr></table> <b>Data on sexual orientation of CTR claimants is not currently recorded.</b>		Sexual Orientation	Borough Population	Straight or Heterosexual –	89%	Not answered –	7.6%	Gay, Lesbian, Bisexual or other (LGB+)	3.4%												
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Across groups i.e older LGBT service users or Black, Asian & Minority Ethnic young men.	<p><b>Data across groups of CTR claimants is not currently recorded.</b> <a href="#">DataRich</a> – Population Explorer has some demographic data across characteristics (e.g. sex by ethnicity, age, disability etc.) – can be found by Ward.</p> <p>Of those in the Borough receiving Universal Credit,</p> <ul style="list-style-type: none"><li>• 50% of the case load is single</li><li>• 35% of the case load is single people with children.</li><li>• 11% is Couples with Children</li><li>• 3.1% couples with no Children</li></ul> <p>The average IDACI and IDAOPI scores indicate that 7% of children (0-15) and 9% of older people (60+) in the borough are affected by income deprivation.</p>																					
Socio-economic status	<b>Deprivation</b>																					

<p><b>(to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b></p> <p><b>Include the following groups:</b></p> <p><b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></p> <ul style="list-style-type: none"><li>• <b>Low-income groups &amp; employment</b></li><li>• <b>Carers</b></li><li>• <b>Care experienced people</b></li><li>• <b>Single parents</b></li><li>• <b>Health inequalities</b></li><li>• <b>Refugee status</b></li></ul>	<ul style="list-style-type: none"><li>• Richmond has the lowest deprivation (based on ONS measure) in London and ranks amongst the least deprived third of Local Authorities in England for five of seven deprivation domains. This includes barriers to Housing and Services, Education, Skills and Training; Employment; Health Deprivation and Disability and Income)</li><li>• The borough is the least deprived in England for Education, skills and Training.</li></ul> <p><b>Low-income Groups and employment</b></p> <p>There were 8,394 households on Universal Credit in May 2024</p> <p><b>Carers</b></p> <p>13,146 residents reported providing unpaid care, which is the 5<sup>th</sup> lowest proportion in London.</p> <p>In England and Richmond, females reported providing more unpaid care than males, with majority aged 50-59 years.</p> <p><b>Care Experienced People</b></p> <p>At the end of March 2019, 115 children and young people were looked after by the authority, of 25 per 10,000 of the populations.</p> <p><b>Single Parents</b></p> <p>Richmond has 7,078 Lone Parent families in the borough.</p> <p><b>Health Inequalities</b></p> <p>Richmond borough has generally better health than London and England averages. With life expectancy higher than the national average.</p> <p><b>Refugee Status</b></p> <p>Refugee status - There are 842 people with refugee status outside of the Hong Kong BNO scheme currently living in Richmond (04/2024).</p> <table><tr><th>Scheme</th><th>Richmond</th></tr><tr><td>Richmond Syrian Resettlement scheme (2015- date)</td><td>Six families (32 people)</td></tr><tr><td>Afghan Resettlement scheme (2021 – date)</td><td>Four families (19 people)</td></tr><tr><td>Homes for Ukraine scheme (2022 – Date)</td><td>765</td></tr><tr><td>Unaccompanied Asylum-Seeking Children</td><td>26</td></tr></table>	Scheme	Richmond	Richmond Syrian Resettlement scheme (2015- date)	Six families (32 people)	Afghan Resettlement scheme (2021 – date)	Four families (19 people)	Homes for Ukraine scheme (2022 – Date)	765	Unaccompanied Asylum-Seeking Children	26
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	Hong Kong BNO scheme	No exact data available, but proxy data shows 497 School Applications from Hong Konger and 985 people indicated they were born in Hong Kong in the 2021 Census	
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### Data gaps

Data gap(s)	How will this be addressed?
Sex, Gender Reassignment, Marriage/Civil Partnership, Pregnancy and Maternity, Race/Ethnicity, Religion, Sexual Orientation, Refugee Status	The information is not collated as it is not relevant for a decision to be made on a scheme and does not affect entitlement to CTR

## 4. Impact

Protected group	Positive	Negative
Age	<p>The change in CTR scheme will mean all working age people's CTR claim is calculated based on an income banded scheme. Household will receive a CTR contribution from 35% to 100% depending on their income.</p> <p>954 Households will receive increased support.</p> <p>Under the proposed scheme people in this category will either receive an increase or decrease level of support towards their Council Tax bill. The decrease is due to the introduction of income bands to mitigate against fluctuations in income which currently causes multi council Tax billing and can lead to people not paying their Council liability over the course of the year.</p> <p>All Households will benefit from the change as it enhances stability for people with earned income and have small fluctuation in earnings.</p> <p>Households with no earned income will be eligible to receive up to 100% Council Tax Reduction.</p>	<p>Household with earned income above the bands would be ineligible for Council Tax Reduction.</p> <p>355 Households aged between 18-65, around 7% of claimants, may be affected by the changes. To mitigate against this the Council is proposing to offer Multiyear Transitional protection (up to 3 years).</p> <p>There is scope within the rules to amend the scheme each year to take into consideration changes in costs of living and income levels. The scheme is flexible and can be amended easily by changing maximum income band values or % CTR discounts for working age bands with earned income.</p>

<b>Disability</b>	People who are in receipt of a disability benefit will receive 100% support towards their Council Tax reduction	<b>N/A</b>
<b>Sex</b>	<p>The change in CTR scheme will mean all working age people's CTR claim is calculated based on an income banded scheme. Household will receive a CTR contribution from 35% to 100% depending on their earned income.</p> <p>954 Households will receive increased support.</p> <p>All Households will benefit from the change as it enhances stability for people with earned income and have small fluctuation in earnings.</p> <p>Households with no earned income will be eligible to receive up to 100% Council Tax Reduction.</p> <p>Females will be more affected by the scheme changes with the introduction of income bands.</p>	<p>Household with earned income above the bands would be ineligible for Council Tax Reduction. 355 households aged between 18-65 will receive reduced entitlement due to the changes, to mitigate this the Council is proposing to offer Multiyear Transitional protection, potentially up to 3 years.</p> <p>There is scope within the rules to amend the maximum income band to take into consideration the fact that incomes are not meeting the rising costs.</p>
<b>Gender reassignment</b>	As Above	None identified
<b>Marriage and civil partnership</b>	As Above	None identified
<b>Pregnancy and maternity</b>	As Above	None identified
<b>Race/ethnicity</b>	As Above	None identified
<b>Religion and belief, including non belief</b>	As Above	None identified
<b>Sexual orientation</b>	As Above	None identified
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b> <b>Include the following groups:</b> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the</b></li> </ul>	<p>The CTR Rule Change will mean all working age people's CTR claim is calculated based on an income banded scheme. Household will receive a CTR contribution from 35% to 100% depending on their income.</p> <p>954 Households will receive increased support.</p>	<p>Household with earned income above the bands would be ineligible for Council Tax Reduction. 355 households will receive reduced entitlement due to the changes.</p> <p>355 Households aged between 18-65 may be affected by the changes to mitigate this the Council is proposing to offer Multiyear Transitional</p>

<p><b>2019 English Indices of Deprivation)</b></p> <ul style="list-style-type: none"> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<p>All Households will benefit from the change as it enhances stability for people with earned income and have small fluctuation in earnings.</p> <p>Households with no earned income (out of work benefits) will be continue to be eligible to receive up to 100% Council Tax Reduction.</p> <p><b>Carers</b> If eligible, carers can claim Council Tax reduction and have been included in the current scheme change. There is also additional support provided by Council Tax</p> <p><b>Care experienced people</b> If eligible, care experienced people can claim Council Tax Reduction and have been included in the current scheme change.</p>	<p>protection, potentially for up to 3 years.</p> <p>There is scope within the rules to amend the maximum income band to take into consideration the fact that incomes are not meeting the rising costs.</p> <p><b>Refugee status:</b> People with No recourse to public fund are unable to claim Council Tax Reduction. This information is provided in the CTR Scheme document available on the Council Website.</p>
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## 5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Advertise scheme changes to residents via Council web page, Council Newsletter, local press and twitter	Nichola Obande	
Briefing sessions to Front line and back-office staff regarding the proposed changes to be able to better advise residents on the changes.	Nichola Obande	
Guidance material sent out with the Council Tax annual bill with information on the new scheme for residents to understand how the new bill has been calculated.	Nichola Obande	
There is scope within the rules to amend the maximum income band to take into consideration the fact that incomes are not meeting the rising costs.	Nichola Obande	Ongoing

## 6. Further Consultation (optional section – complete as appropriate)



Consultation planned	Date of consultation
<p>The Council will consult on the scheme and following this have the changes agreed by Council. The level of consultation required for changes to CTRS has been scaled back from the initial scheme and it is no longer necessary to write to every Council Taxpayer. However, it is important that the consultation is available to both Council Tax Reduction Recipients and other Council Taxpayers e.g. a Notice in the local press directing people to a page on the Council's website. The consultation page should be available for comment for at least 1 month and following analysis of the response the proposals will be submitted to committee for approval.</p>	15/11/2024