

Resident Impact Assessment

**Screening and full assessment of Islington's
Council Tax Support (CTS) Scheme.**



Contents

Click to navigate to sections

1. [Introduction and context](#)
2. [Initial Screening](#)
3. [The proposal](#)
4. [Equality Impacts](#)
5. [Socio-economic, safeguarding and Human Rights impacts](#)
6. [Summary: key findings of the RIA](#)

1. Introduction and context

A Resident Impact Assessment (RIA) is a way of systematically and thoroughly assessing policies against the Council's responsibilities in relation to the Public Sector Equality Duty, Human Rights and Safeguarding.

This RIA will describe the CTS scheme, its intended purpose and how it has been implemented. It will detail which residents are expected to be affected by the policy and the expected impact in relation to:

- The [Public Sector Equality Duty](#);
- Safeguarding responsibilities; and
- Human Rights legislation, specifically with regard to Article 3 (Inhuman Treatment) and Article 8 (Right to Private Life)

We will identify evidence, such as data and research, to assess the impact of the CTS scheme and identify options for addressing issues raised by the assessments.

2. Screening

a) Title of new or changed policy, procedure, function, service activity or financial decision being assessed:	Council Tax Support Scheme (CTS) 2023 - 2024
b) Department and section:	Community Wealth Building, Community Financial Resilience
c) Name and contact details of assessor:	Robbie Rainbird, robbie.rainbird@islington.gov.uk
d) Date initial screening assessment started:	3/10/2022
e) Describe the main aim or purpose of the proposed	To help low-income council tax charge payers pay their Council Tax

new or changed policy, etc. and the intended outcomes:

f) Can this proposal be considered as part of a broader Resident Impact Assessment? For example, it may be more appropriate to carry out an assessment of a divisional restructure rather than the restructure of a single team. No

g) Are there any negative equality impacts as a result of the proposal? Please complete the table below:

Select **Yes**, **No** or **Unknown** by clicking on the 'Choose an item' boxes below and enter text in the text boxes in the right-hand column:

Protected characteristics	1. Will the proposal discriminate?	2. Will the proposal undermine equality of opportunity?	3. Will the proposal have a negative impact on relations?	What evidence are you using to predict this impact?
Age	The CTS has some different conditions according to age	No	No	Described in Section 4
Disability	The CTS provides some additional support for disabled people	No	No	Described in Section 4
Gender reassignment	No	No	No	Described in Section 4
Marriage and civil partnerships ¹	No	N/A	N/A	Described in Section 4
Race	No	No	No	Described in Section 4
Religion/belief	No	No	No	Described in Section 4

¹ Only the requirement to have due regard to the need to eliminate unlawful discrimination in employment should be considered.

Pregnancy and maternity	No	No	No	Described in Section 4
Sexual Orientation	No	No	No	Described in Section 4
Sex/gender	No	No	No	Described in Section 4

Please list any opportunities in the proposal for advancing equality of opportunity for any of the protected characteristics.

These are described in section 4.

	N/A
h) Please list any opportunities in the proposal for fostering good relations for any of the protected characteristics.	N/A
i) Is the proposal a strategy that lays out priorities in relation to activity and resources and likely to have a negative socio-economic impact on residents?	No
j) Do you anticipate any Safeguarding risks as a result of the proposal?	No
k) Do you anticipate any potential Human Rights breaches as a result of the proposal?	No

3. The policy, procedure, function, service activity or financial decision

- | | |
|--|-----------|
| a) Date full assessment started: | 3/10/2022 |
| b) Title of new or changed policy, procedure, function, service activity or financial decision being assessed? | |

Council Tax Support Scheme (CTSS) 2023/24

People on low incomes who cannot pay their Council Tax bill can receive CTS to help them.

As part of the Spending Review 2010, the Government announced that expenditure allocated to this localised scheme would be reduced by 10% from the subsidy previously provided for council tax benefit and any increase in expenditure above what is forecast by The Department for Communities and Local Government (DCLG) from that point on must be funded locally by the Council. In 2013/14, the council received in the region of £2.9 million less to give out in

support to claimants. This meant the council had to make savings or increase income to fund the shortfall. The Government also stipulated that people of pension credit age must be protected, which meant that the CTS reduction was directed exclusively at working age claimants and would have meant a reduction of around 18%-20% if the cuts were shared in equal proportions across all working age claimants. Originally, the Council chose to make up for this shortfall by introducing a standard reduction to all Council Tax Support recipients of 8.5%, by taking up the Government's offer of a temporary transitional grant and reducing the level of discounts that those with empty properties could apply for. The Government has subsequently withdrawn any transitional grant but the Council had decided to maintain the original level of support it provides to its CTS residents and funded this additional support wholly from its own funds.

The recommendation now is to retain the level of support of 95% to working age households by keeping the cap to 5%, as agreed for the 2022/23 CTS scheme. This will equate to 95% of the support that was available under the old council tax benefit. Supporting our residents to recover from the economic impacts of Covid-19 is a priority, whilst now helping residents deal with the impacts of cost of living issues. In 2020/21 and 2021/22 we helped all working age households entitled to CTS with a Covid-19 hardship rebate of up to £150 on their annual council tax bill. This was funded by Government grant in 2020/21 and by the Council in 2021/22, the Covid-19 hardship rebate will cease at the end of 2021/22. Increasing the maximum level of support available to working age households allows us to provide further financial assistance to our low income households, helping them to recover from the devastating impacts of the global pandemic, whilst working with them to improve their financial situation including their employment opportunities.

c) What is the profile of the current service users and residents impacted by the change?

It affects everyone in Islington who has to pay Council Tax which broadly speaking means that it affects all residents. The number fluctuates but there are about 146,000 households with a liability for Council Tax.

d) What is the profile of the workforce impacted by the change?

The workforce is not impacted.

e) How will the proposed change impact this profile?

Not applicable

4. Equality impacts and mitigations

No significant issues have arisen as to the impact of Islington's Council Tax Support Scheme since it was introduced in 2013 and the analysis provided in this section should be seen in this context.

Since the Council Tax Support Scheme (CTSS) relates to the distribution of money based on criteria relating to income, it is predominantly data relevant to these issues that has been analysed in order to assess the impact of the CTSS proposals on different groups.

Although it is difficult to update demographic data or information about population statistics without recent national survey data, there is no reason to believe that figures we refer to in this analysis have materially changed from the previous years'.

As the funding for the scheme has been cut by 10% by government and not increased subsequently despite demographic change, the scheme would tend to disadvantage at least some residents with protected characteristics and/or those living in poverty, unless money was found from other parts of the council budget to make up the shortfall. The Government has also stipulated that people of pension credit age must be protected, which means that the benefit paid to other CTS claimants would need to be reduced by an estimated 18%-20% if cuts were shared in equal proportions across all remaining recipients.

However, in order to keep the extent of the financial burden on our working-age CTS claimants low, the Council did not make an 18%-20% reduction but continued to limit the reduction to 8.5% up to 2021/22. This was changed to 5% for 2022/23.

During the Covid-19 period a range of support and financial assistance was provided to our low income and vulnerable households. This included the Covid-19 hardship rebate on council tax bills for working age households, increased local welfare provision support through our residents support scheme, help with food provision and payments of various grants to help with food, utilities, lost income due to self-isolation.

The council tax system holds very little data on most of the protected characteristics, including gender, disability and race. It has therefore been necessary to look at different local and national sources of data from different years in order to build a picture that can be used for this impact assessment.

The 2011 census shows that there are 206,100 residents in Islington and 96,100 households. This is 27,000 more than the 2001 census upon which much of the data in this assessment is based. Notwithstanding its shortcomings, the data is sufficient to get an idea of potential impacts arising from CTS.

Our CTS scheme incorporates full protection for older people against the previous council tax benefit scheme and mitigation for disabled people and large families. Applying the percentage reduction to the end of the benefit award (bottom slicing) rather than taking this from the liability (top slicing) helps people on partial benefit and there was a message from the public consultation that those on partial benefit are more concerned about the impact of the CTS. To illustrate this, in the case where the reduction is 5%:

1) for someone who was in receipt of £20 full CTB, whether the reduction in benefit was top sliced or bottom sliced the reduction is £1 (5%) leaving CTS of £19 for those previously receiving "full" benefit in this example;

2) however, in the case of someone who was previously on partial CTB because they had additional income from working, to reduce their benefit by top slicing would (if the starting point was £20) leave their CTS as £9 (£20 less £1 (5%) less £10 Excess Income = £9). But if

their partial benefit was reduced by bottom slicing instead this would leave their CTS as £9.50 (£20 less £10 Excess Income = £10. Taking 5% of this leaves £9.50). Therefore, choosing to bottom slice makes it better for those on partial benefit which supports the consultation findings.

There is also mitigation for those who might be deemed to be better off by allowing savings of up to £16,000 before someone is disqualified from receiving CTS (this is known as the "capital limit") and giving an additional discount of up to £100 to all pensioners over the state pension age, whether or not they currently qualify for CTS. Although the net effect of providing support to those deemed to be better off is that less money is available for others that may be in greater need, there are positive aspects to Islington's scheme. People who are not particularly well off but have accumulated savings will not be penalised and even if savings were limited to £8,000, because less than 200 claimants out of over 20,000 existing claimants have capital over this limit, the money that would have been available to others is relatively small. In relation to pensioners over state pension age, Islington's minimum CTS of £100 means that there will be no marginal cases of older pensioners who are not quite poor enough to receive the benefit but who are still financially fragile. This age group is likely to have less access to the labour market.

Compared to council tax payers who are not in receipt of CTS, there is a more favourable recovery regime for CTS. Even if a CTS council tax payer is summonsed, we will not use enforcement agents to recover the money and we will remit court costs if they agree to and keep up with a new schedule of payments [which the Council Tax service call Special Arrangements].

Catering for exceptional hardship

Additional support is available to the most vulnerable residents by way of a council tax welfare fund of £25,000 within the Council's Resident Support Scheme (RSS) to support cases of exceptional hardship resulting from additional council tax charges. This will be available on a time-limited basis to residents who apply and meet the hardship criteria. Money has been generated for this fund by removing the 10% discount on second homes in Islington and charging more council tax on empty homes.

In the first 6 months of 2023/24 over 25,000 claimants qualified for council tax support and there have been 23 applications for additional support, as a result of which £3,283 was awarded.

Further analysis by protected characteristic

Summary

Since the introduction of the CTS scheme there is no evidence that any particular group is particularly impacted.

Our welfare reform response team (iWork) and our IMAX teams have not reported issues with CTS.

By September 2013 - the first year of the scheme - we had collected 50.1% of council tax monies owed; by September 2015 we had collected 51.5%; by September 2018 we had collected 51.1%, by September 2019 we had collected 51.75% and by August 2020 we had

collected 56%. Overall, it appears that our council tax collection performance continues to be strong. There is evidence that working age CTS claimants are less likely to pay than any other type of council tax charge payer. This should be expected as this group are defined by a low income and the majority have previously been unused to paying anything towards Council Tax. The collection rate for 21/22 was helped by the COVID19 hardship fund awards.

Age

Key facts

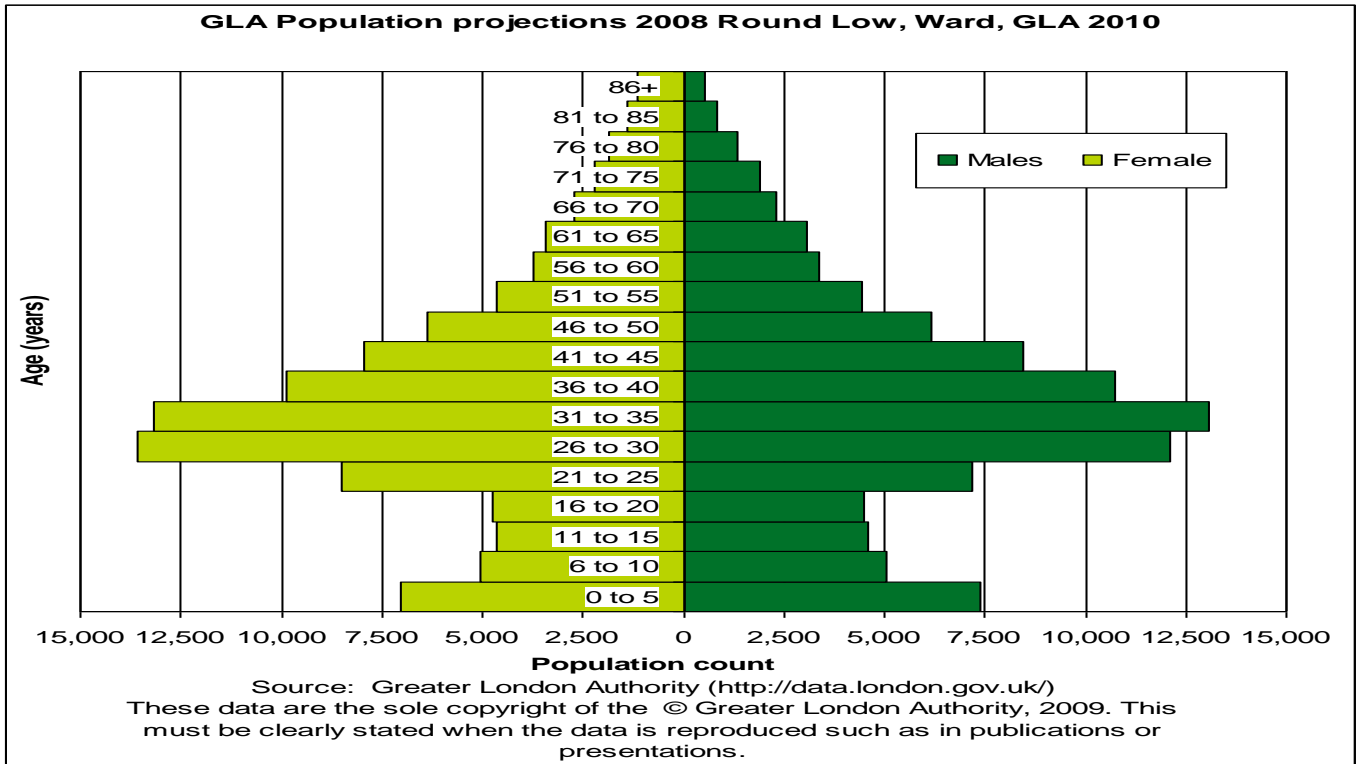
Older people

- 41% of over 65s in Islington are income deprived and 53% are in fuel poverty
- Pension poverty affects women more than men
- The older the pensioner the greater the likelihood to be living in a low income household.
- Pensioners living in a household headed by someone from a BME community² were more likely to be at the lower end of the income distribution curve.
- Disabled pensioners in households not claiming appropriate disability benefits were much more likely to be in a low income household.
- There are approximately 22,750 people aged 51 to 65 in Islington – evidence indicates that people in this age group are least likely to find another job if they become workless. Islington, alongside Hackney, Tower Hamlets and Newham have the highest proportion of pensioners receiving the Guarantee element of Pension Credit

Younger people

- There are approximately 800 known carers under the age of 19 in Islington.
- There are 1,575 residents aged 18 to 24 and 4,180 aged 25 to 49 claiming Job Seekers Allowance
- There are 5,100 residents aged 25 to 49 claiming Employment Support Allowance;

² In this context BME refers to the non-White population. Link:
http://research.dwp.gov.uk/asd/hbai/hbai2010/pdf_files/full_hbai11.pdf



Impact assessment

Older people of pension credit age are protected under the scheme, and those over state pension age will also continue to receive the £100 rebate. The proposals therefore do not lead to any financial impact on older people who currently receive the benefit or are eligible. From the information available, it is not possible to assess whether the scheme is accessible to older people (who may have a range of access needs) or their carers. Given needs are met once identified, it would be important to make very clear through a range of channels that information etc is available in other formats, and that staff and voluntary sector and community organisations can also provide support.

When it comes to age, much of national policy on this and related welfare reforms protects pensioners while working age benefit recipients experience cuts. The council proposals reinforce this distinction by retaining the £100 older person’s discount. Although it could be argued that this leads to disproportionately worse impacts on those of working age, national and local data on the number of older people living in poverty and not necessarily claiming benefits means that the council’s position is reasonable from an equality perspective. Furthermore, those in the over state pension age category are less likely to access, or have access to, the labour market to supplement their income than those of working age. People of working age, including young people, are only eligible for CTS where they have an additional need, for example because of a disability or they are on a low income. The cumulative impact of welfare reforms on this group is significant and eligible younger residents may not be aware of what they are entitled to. Communication methods more suited to younger people such as text messaging, social media etc, may be useful in raising awareness.

In retaining the maximum support to working age households by retaining the cap at 5% will allow us to continue to provide increased support to low income working age households.

Mitigation

Develop plans to ensure that information, support and advice is accessible and that the option to claim and ways to do so are well signposted by services and organisations in contact with potentially eligible residents and through proven communication channels.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement. In addition we will operate various benefit take-up campaigns to raise awareness in the community to claim entitlements, plus pro-actively target those who we believe should be entitled to additional benefit. In 2020/21 & 2021/22 we ran pension credit take-up campaigns that helped pensioners claim an additional £1.245m of annual benefit entitlement. We are running further campaigns in 2022/23.

Disability

Key facts:

- There are 26,327 households with one or more person with a limiting long-term illness
- 12,540 claim out of work sickness benefits (incapacity benefit, severe disablement allowance and employment and support allowance)
- There are 7,350 working age Islington residents claiming Disability Living Allowance (a non-means tested benefit available to employed or out-of-work disabled people) - 6,270 have been claiming for at least two years and 4,860 for at least 5 years.
- There are 2,240 people claiming Carer's Allowance (CA), of which 2,080 are of working age
- The employment rate amongst disabled people is 48.2%
- Nationally 50% earn less than half the mean earnings after adjusting for extra costs
- Twice as likely to live in poverty but less likely to be in low income if in a workless household
- Disabled pensioners in households not claiming appropriate disability benefits were much more likely to be in a low income household.

The public consultation responses in 2012 and 2016 provide indications that disabled people are concerned about being able to cope financially but the numbers of respondents where this kind of data appears is low. A relatively small number of disabled and non-disabled respondents volunteered the view that disabled people should pay less council tax, with a greater proportion of working age as opposed to pension age respondents expressing this view.

In respect of this characteristic, no significant issues have emerged during the operation of the CTS scheme.

Impact assessment

Disabled people are disproportionately likely to be poor, out of work and on benefits. They are disproportionately affected by welfare reform overall. It is estimated that those IB claimants who have already migrated to ESA Support Group will be £17 a week better off. However, 33% will be on ESA Work Related Activity Group and be £4 a week worse off and 18% will migrate to JSA and be £40 a week worse off.

Continuing the cap at 5% means that working age disabled people on low incomes will continue to get 3.5% more CTS than they did in previous years 2021/22 and before. Although the CTS scheme provides higher amounts for disabled people they still get 5% less than they did from council tax benefit in 2012. The higher costs of care, transport and general living combined with the labour market disadvantage faced by disabled people could make the reductions stemming from the CTS scheme difficult for them to cope with. However, while members of this group are often economically disadvantaged, the rationale of a universal rather than means tested approach was challenged at the disabled group workshop. Some disabled people may not need the extra financial support and the argument made was that looking at groups rather than more specific individual or household circumstances is too simplistic.

Mitigation options

The Council has limited the reduction in benefit for disabled people from 18% to 8.5% up to 2021/22. For 2022/23 the Council has changed the limit to 5% providing more support and giving people greater opportunity to adapt their financial circumstances.

Supporting those with long-term health conditions into employment is the best route out of poverty and is also recognised to be of benefit, particularly to people with mental health problems. We will have a particular focus on ESA claimants in the employment work of our iWork Team, utilising specific funding to increase the number of work coaches as well as continuing the work started under the Universal Services Delivered Locally trial.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement. We plan to have a specific focus on disability benefits in some future benefit take up campaigns, to help disabled residents claim all the benefits they are entitled to receive.

Race

Key facts:

- Employment
 - Non-white employment rate in Islington is 51.4%
 - Nationally, the rate is 59% for non-White compared to 72% for White people
 - Nationally 10% Indian and 15% White British men over 25 are not working compared with 30% to 40% for Bangladeshi, Pakistani, Black Caribbean and Black African. The high number of students explains much of the higher proportion for Black African. The ethnic profile of people starting to claim JSA in Feb 2010 showed that the proportion that were Black/Black British was 6 percentage points higher than their proportion in the 2001 census, while the proportion that were White was 22 percentage points below their proportion in the 2001 census.
- National data on earnings shows that those from Bangladeshi and Pakistani backgrounds are almost twice as likely to earn less than £7 per hour than those from Black African, Black Caribbean and White British backgrounds.
 - 48% Bangladeshi, 42% Pakistani
 - 27% Black African, 23% Black Caribbean
 - 25% White British

- Households below Average Income (HBAI) survey shows that children are much more likely to live in poverty if they are in a family headed by a BME parent, especially someone of Pakistani, Bangladeshi or Black Non-Caribbean origin.

The following table shows the ethnic distribution of families in Islington, differentiated between those who received Council Tax Benefit and those who did not.

	Yes - on CTB	Not on CTB	Grand Total	Yes - on CTB	Not on CTB	All
1 White British	2252	4950	7202	29%	38%	35%
2 Other White	597	1286	1883	8%	10%	9%
3 Turkish / Turkish Cypriot	503	242	745	6%	2%	4%
4 Kurdish	57	21	78	1%	0%	0%
5 Bangladeshi	355	333	688	5%	3%	3%
6 Asian	131	218	349	2%	2%	2%
7 Black Caribbean	328	483	811	4%	4%	4%
8 Black Somali	324	187	511	4%	1%	2%
9 Black African	480	649	1129	6%	5%	5%
10 Black Other	345	424	769	4%	3%	4%
11 Chinese	53	92	145	1%	1%	1%
12 Mixed	882	1469	2351	11%	11%	11%
13 Other	235	386	621	3%	3%	3%
14 Not Obtained / Refused	78	183	261	1%	1%	1%
15 Unknown*	1060	1564	2624	14%	12%	13%
Missing	155	416	571	2%	3%	3%
Grand Total	7835	12903	20738	100%	100%	100%

Reviewing CTS take-up within this cohort, the biggest discrepancy is among 'white British' residents who are significantly under-represented, and 'other white' who are slightly under-represented. Bangladeshi, Black Somali, Turkish/ Turkish Cypriot and to a slightly lesser extent Black African are all over-represented. These figures are in line with what might be expected given the employment data briefly stated earlier, which indicate relative levels of poverty in different communities.

- Refugees & Asylum Seekers
 - Data from 2002 indicates a 29% employment rate nationally among refugee and asylum seekers, which is much lower than average for BME people. (Bloch 2002)
 - From a small Islington sample, the data suggests those who work are in low paid, low-skilled jobs

- Gypsies & Travellers

There are estimated to be 55 gypsy and traveller families in Islington, mostly living in houses. Although this community is small, its challenges are acute, with significantly disproportionate outcomes compared to any other group. For example, gypsies and travellers have the worst health outcomes of any racial or ethnic community and are twenty times more likely to experience the death of a child.

The consultation responses did not point to any significant issues emerging based on ethnic background and none have emerged during the operation of the CTS scheme.

Impact assessment

Welfare reforms, the economic situation and historic inequalities in employment together are likely to result in lower incomes for Black and Minority Ethnic (BME) residents, who will therefore be disproportionately affected by the reduction in CTS. Known barriers such as limited English and lack of familiarity with the system need to be mitigated by improving accessibility, especially for the most disadvantaged groups.

Mitigation options

Working through partners as well as using our own resources, we will ensure that access to CTS, as well as the Resident Support Scheme (RSS), is made known to those in greatest need, so that eligible residents from all ethnic backgrounds receive support.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Religion/Belief

Key facts:

- Muslims experience much higher rates of unemployment (15.4%) and economic inactivity (51.4%) compared with the average for all groups (6.5% and 32.4%)
- National research also suggests a “Muslim penalty” in employment, especially for women

Impact assessment

From available data there appear to be no significant negative impacts that can be distinguished from religion/belief. Residents are not adversely impacted by the scheme by virtue of their religion/ belief (or absence thereof).

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Gender and relationships

This section covers gender, marriage, civil partnerships and gender re-assignments.

Key facts:

- Employment rate: 71.7% men, 63.8% women
- The majority of lone parents of children living in poverty are women
- Incapacity benefit: 5,320 men (57%), 4,030 women (43%)
- Over 75% Bangladeshi & Pakistani women not in paid work
- Nationally, the number of women not working is decreasing while the number of men not working is increasing, however the difference between the sexes of those aged 18 to 24 is low.

2016 and 2021 consultation responses did not point to any significant issues emerging based on gender and none have emerged during the operation of the CTS scheme.

Impact assessment

There appear to be no significant negative impacts for most people in this group due to any of these protected characteristics. The arrival of a new child increases household expenditure but this fact is already acknowledged in existing regulations which retain family premiums and disregard child benefit as income.

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Pregnancy, maternity and family life

Key facts:

- There are 20,387 households with dependent children in Islington, of which 6,859 (34%) headed by a lone parent
 - 8,702 with children aged 0 to 4
 - 7,204 no adult working (35%)
- 46% living in poverty – 2nd highest nationally
- Most significant factors are lone parent, BME parents, disability, 3 or more children
- Of all the children in Islington HB/CTS data shows that:
 - 39% (14,867) are in families on out of work benefits
 - 15.2% (5,746) are in working families on incomes low enough to qualify for HB/CTB
 - 45.8% (17,348) are in families sufficiently well off enough not to need to claim HB/CTB

Table below showing Information from Children Services showing the number of households in Islington with dependent children:

Households Below Average Income (HBAI) survey shows that children are much more likely to

lone parents

all children

Row Labels	Yes - on CTB	Not on CTB	Grand Total
lone parent	6636	5564	12200
two parents	9903	17669	27572
Unknown	16	81	97
Grand Total	16555	23314	39869

lone parents

households

Row Labels	Yes - on CTB	Not on CTB	Grand Total
lone parent	3489	3114	6603
two parents	4332	9722	14054
Unknown	14	67	81
Grand Total	7835	12903	20738

low income

all children

Row Labels	Yes - on CTB	Not on CTB	Grand Total
low income	16103	8025	24128
not low income	452	15289	15741
Grand Total	16555	23314	39869

low income

households

Row Labels	Yes - on CTB	Not on CTB	Grand Total
low income	7626	3623	11249
not low income	209	9280	9489
Grand Total	7835	12903	20738

live in poverty if they are in a family headed by a BME parent, especially someone of Pakistani, Bangladeshi or Black Non-Caribbean origin; living in overcrowded accommodation; with three or more children; headed by a lone parent or with a disabled family member.

There are 1,400 households with 2,420 child dependents (aged up to 18) claiming IB or Severe Disablement Allowance.

It is estimated that the vast majority of Islington households with children, whose housing will become unaffordable due to LHA changes and the overall Benefit Cap will be workless households.

In this information, over 55% (11,306) of all households with children were on housing and/or council tax benefit, but a far higher proportion of these were headed by lone parents than the population as a whole: 59% (4,036) of lone parent households on HB/CTB compared with 37% (5,045) of the couple households

The consultation responses segmented by those with and without children indicated that concerns about family finances were high for both groups, but that those with four or more children were particularly concerned, and those with children were more likely to raise the issue, unprompted, of struggling with money because they have children to care for. However, it should be noted that the actual number of responses received voicing these concerns was very low and in respect of this characteristic no significant issues have emerged during the operation of the CTS scheme.

Impact assessment

The council has in place a number of measures to support families with children – a key issue in looking at poverty in the borough as the data above indicate. By retaining all family premiums and applicable amounts, the council recognises that families require a higher level of income to support their household.

It has been decided not to cap benefit at the higher bands and their benefit will be based on the actual charge for the property. This means that there will be no adverse impact for families in larger properties because they are in a higher band. They will be no worse off because they are in a higher banded property. If benefit was capped at band D or E, benefit could only be paid up to this band and the customer would have to pay the full amount above that, which might mean they incur hundreds of pounds of new costs.

Mitigation options

As with other affected groups, it is important that take up is encouraged and that families in greatest need are provided with additional support through the RSS.

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

Sexual Orientation

Key facts:

- 84% LGBT economically active compared to the 75% population

- Economic activity is more likely to continue beyond age 55
- 73% female and 79% men on incomes above the average for London
- 3% live in households with children under 18
- 10% live in social housing compared to 49% of the overall Islington population
- 37% experience mental health problems at some point

Source: Revealing LGBT Islington study 2005

Impact assessment

The data indicates that LGBT people tend to be economically better off than other groups, as they are more likely to be in work, work for longer and be on higher salaries. This group may be more at risk of specific conditions, such as mental health problems or being HIV+, than the general population, but where this is the case then their situation is addressed in the disability section. There are no negative impacts associated with sexual orientation triggered by this scheme.

Mitigation options

Assist with the claiming of all entitlements for all ages of residents. Our IMAX service during 2021/22 helped residents claim an additional £5.064m of annual benefit entitlement.

b) Mitigation for people with protected characteristics

- Retaining the cap at 5% despite no longer having a transitional grant from government to cover this and many local authorities moving away from this level of cap and passing the full extent of the government council tax benefit funding reduction to residents. This will ensure that those with protected characteristics are not impacted by the full possible extent of the government funding reduction and provides them with more support than the scheme in previous years.
- The regulations of the council tax benefit scheme have been retained, and these already make extra provision for disabled people and families by:
 - retaining all disability premiums so that the level of allowable income before tapers are introduced is higher than for the average working age person;
 - continuing to disregard as income certain disability benefits such as Disability Living Allowance (DLA) and War Disablement Allowance;
 - ensuring that no non-dependent deductions apply if a person is in receipt of DLA (care component) therefore allowing him/her to qualify for a disability premium;
 - retaining all family premiums and applicable amounts in recognition of the fact that families need a higher level of income to support their household;
 - continuing to disregard Child Benefit as income in the calculation of benefit entitlement – this means that there is an allowance for each child and a premium for disabled children.

- Further to the original regulations we agreed to afford recipients of Personal Independence Payments (PIP) the same favourable premiums and allowances in the CTS scheme as we did DLA recipients, from the start date of the new benefit.
- The regulations also encourage moving into employment by:
 - offering a 4 week guaranteed payment of existing benefit level to those attaining work
- The re-use of the existing regulations also:
 - supports and promotes an incentive for saving by retaining the savings limit of £16,000 that exists within the current scheme
 - does not cap the reduction/support for higher property bands to ensure that there is no adverse impact on families in higher banded properties

In addition, current practice in Islington to support people with accessibility requirements will be retained. Therefore, documents are made available in different formats such as large print, audio and Braille and once known, the requested format will be provided as a matter of course. Translation services and interpreting services are also available when requested.

5. Socio-economic, Safeguarding and Human Rights impacts

a) Socio-economic impacts

Socio-economic disadvantage is not a protected characteristic but is a consideration included in the resident impact assessment given the significant income inequality within the borough. The previous Council Tax Benefit scheme was a means tested benefit available to households on a low income. Therefore, all recipients would be considered to be at a socio-economic disadvantage, particularly lone parents (more likely to be women), part time workers (more likely to be women) and large households (more likely to be from BME backgrounds). Currently there is little or no Council Tax Benefit data breakdown on the following protected characteristics: gender reassignment/identity, marriage and civil partnership, pregnancy and maternity, religion/belief or sexual orientation. During the lead up to the new CTS scheme, extensive consultation and communications were undertaken. Raising the awareness of residents of the CTS scheme. We have made available Council Tax payment options that include 2 weekly instalments over 12 months and direct debits have been widely publicised. The service will work with debt counselling and financial inclusion provisions within the borough. Islington is increasing the employment and skills provision in the borough through an Employment unit called iWork and is leading on a trial employment support initiative called "Universal Support Delivered Locally" to work with residents affected to increase their skills and the potential for them to get into employment. Actions to minimise causing further hardship to people already on low incomes have been identified in earlier sections.

b) Safeguarding risks

No safeguarding issues for children or vulnerable adults were identified.

c) Human Rights breaches

No human rights issues were identified.

6. Summary: core findings of the RIA

a) Key impacts of the **proposal**:

- Since the Council Tax Support Scheme (CTS) relates to the distribution of money based on criteria relating to low income then all residents on low income who are liable for council tax are affected by this proposal.
 - Since the Council is using its own resources to limit the extent of the reduction in benefit to 5% then all residents are impacted by this proposal as they all have a stake in how the Council uses its limited resources.
-

b) **Equality impacts** of the proposal:

- The impact on all working age CTS claimants and potential claimants is that they will now have to contribute 3.5% less towards their Council Tax bill than they would have done up to March 2022. By not changing the agreed council tax support scheme since its inception, affected residents have not been subject to any further subsequent disadvantage. The impact on pension age CTS claimants is probably negligible as they have been protected from the 5% reduction.
 - No other impacts specific to people with protected characteristics have emerged during the previous 12 months' operation of the CTS scheme.
 - No complaints or appeals specific to the CTS scheme have been received.
 - The percentage of collection rates for 2021/22 compared to 2020/21 are very similar.
-

c) Safeguarding **risks** identified:

- None
-

d) Potential Human Rights breaches identified:

- None
-

e) **Monitoring:**

Issue to be monitored	Responsible person or team
The nature of any appeals against the operation of the CTS scheme	Appeals & Complaints (Community Financial Resilience)
The nature of any complaints about the operation the CTS scheme	Appeals & Complaints (Community Financial Resilience)
The difference in the council tax collection rates between CTS working age and all other council tax charge payers.	Andrew Spigarolo (Head of Service; Revenues)
The volume of requests made to the RSS for help to pay council tax	Eileen Broderick(IMAX & RSS Manager, Community Financial Resilience)

Additional items to be monitored:

- None

Please sign and date below to confirm that you have completed the Resident Impact Assessment in accordance with the guidance and using relevant available information. (A signature must also be obtained from a Service Head or higher. If this is a Corporate Resident Impact Assessment, it must be signed by a Corporate Director).

Staff member completing this form:

Head of Service or higher:

Signed: 

Date: 3/10/22

Signed: 

Date: 3/10/22