

The London Borough of Tower Hamlets:

The Council Tax (Benefit) Replacement Scheme 2014/15

The Equality Impact Assessment for Tower Hamlets

September 2013

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Executive Summary

The UK government is now undertaking some of the most substantial changes to national welfare benefits in more than 30 years. One of the key elements of these changes, which were amongst the first to be implemented, is the replacement of Council Tax Benefit which began from April 2013. The Council considers here the formal Impact Analysis to the Borough as preparations for the Council Tax Support Scheme in respect 2014-15 begin.

Under Government rules, responsibility for the rules for the awards of Council Tax Support are delegated to local Billing Authorities. The Government has also applied a 10% cut in funding, which in the Borough's case means a cut in funding of approximately £3m for 2013/14.

The Borough is one of the most deprived in the country, and as a direct consequence, there are high numbers of households within the Borough who are entitled to receive financial support to help with payment of Rent and Council Tax. This year, the Council expects to pay out over £293m in benefit payments in the Borough.

The Council determined that for the current year, no cut in Council Tax Support would be applied. Under Government rules, this is sometimes called "adopting a Default Scheme". The Council proposes to adopt a local scheme for 2014/15 called Council Tax Replacement (CTR), and under this proposal:

- The continuing "cut" in government grant towards the cost of Council Tax Support will not be passed onto Benefits customers;
- The maximum eligible amount under the Council's proposed scheme will remain 100% of eligible Council Tax; and
- The rules to be followed for the awards of CTR will remain substantially as under the existing scheme.
- In a minor change which is proposed, War Widows eligible to receive support will be deemed as exempt from payment.

The purpose of this report is to consider the effect on different groups who are protected under the Equality Act by discussing the potential effects of the proposed changes on such groups, and to ensure that the Council meets its Public Sector Equality Duty.

Tower Hamlets Benefits Service

(in conjunction with Simon Horsington and Associates)

September 2013

1 Introduction and Overview

1.1 Background

The Government is committed to implementing the most significant changes to national welfare systems that have been seen in more than thirty years. The change programme has begun, and in addition to the changes to Council Tax Benefit which take effect from 2013, further significant changes to welfare systems have also been introduced including the “bedroom tax” and the Benefit Cap.

1.2 The Protected Characteristics

Under the Equality Act 2010, public authorities will consider the potential impact of proposed policy changes with regard to the following statutory Protected Characteristics:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Ethnicity
- Religion or belief;
- Sexual orientation.

The Council’s research suggests that data is available and which can support conclusions for the Protected Characteristics of Age, Disability, Gender, and Ethnicity.

1.3 This Report

This report is constructed to enable an informed decision making process, and with reference to the following sections:

- **At section 2:** A summary of the statutory welfare changes which must be implemented from April 2013;
- **At Section 3:** A brief summary of the proposed Scheme;
- **At section 4:** A summary of the equality impacts of those options within the Council;
- **At section 5:** A summary of analysis of the overall trends within the costs of welfare payments; and

- **At section 6:** Overall conclusions and recommendations.

2 The Council Tax Support Scheme

2.1 Overview

This section explains the key points about the Council Tax Support scheme, within the context of what is currently known about the changes underway within the national welfare benefits system. It is to be stressed that many commentators believe that the Government is attempting the most significant changes to welfare that have been seen for at least 30 years. Indeed the Institute for Fiscal Studies have argued that the changes to be faced are the greatest in 40 years. An additional complicating factor is the speed with which the change programme is being attempted. There is an extent to which, therefore, the changes to Council Tax operate within a context of wider welfare reform that is very much still under development.

In summary, the key changes to welfare may be considered as follows:

- From April 2013, the new **Council Tax Support** began;
- Restrictions to the **rate of annual uprating** which is applied to a series of welfare payments began in April, meaning that in real terms, amounts of some Benefits payable no longer keep pace with inflation;
- From April 2013, Councils became responsible for one-off payments for specific purposes under the administration of **Crisis Loans and Social Fund payments**;
- The so-called "**Bedroom Tax**" was implemented from April 2013;
- From 12th August 2013, the total "**Benefits Cap**" has been gradually rolled out;
- The replacement of Disability Living Allowance with **Personal Independence Payments** (PIP) began from the summer; and
- From the autumn of this year, the Government's flagship changes to national welfare payments under **Universal Credit** are likely to see further national pilots or similar. The impact on residents within Tower Hamlets during 2014/15 is expected to be very minimal and quite possibly none at all. Progress in rolling out Universal Credit is very much behind original timescales set by the DWP.

It is anticipated that as the above implementations proceed, and as the necessary policy changes to "fine tune" systems are identified, that further changes may be applied by the Government.

2.2 The Council Tax Support Scheme

Overview

The UK Government currently administers the appropriate provisions for reductions in Council Tax payments through two different Departments, the Department for Work and Pensions (DWP), and the Department for Communities and Local Government (DCLG). The DCLG have driven the programme for the reform of Council Tax Benefit.

Previously, Government grant for Council Tax Benefit was designed to largely match actual expenditure, and was claimed at the end of the year through the Council Tax Benefits Subsidy system. Grant for the Council Tax Support scheme will be cash limited, and is intended to cost the Government 10% less than the current scheme.

Overall Financial Impact

Under the arrangements which applied until this April, the lowest income households identified by a statutory means test were entitled to a maximum of 100% benefit award against Council Tax Liability.

The Government has decided to make savings in the cost of awards for Council Tax Benefit, and has calculated a 10% cut **in the overall cost of Council Tax Benefit** which will be applied to each Council.

Overall Financial Impact: Claim Groups

The overall value of claims for the Council is summarised as follows:

Table 1: Claims distribution, Working and Pension Age:

Claim type	Value (£)	%
Working Age	20,242,724	71.7%
Pension Age	7,988,980	28.3%
Total	28,231,705	

The overall value of claims, as at September 2013 is £28.23m, of which £20.24m is paid in respect of Working Age claims and £7.99m in respect of Pensioner claims.

2.3 Context to the Impacts: A Brief Reminder on National Welfare Reforms

Council Tax Support is only a part of wider changes to welfare reform which are being completed by the Government. As the Council considers the potentially significant impacts of proposed changes to local welfare

which must be considered, a brief reminder of that national context is summarised:

-
- All the changes which are to be made to national welfare systems cannot yet be fully assessed, and indeed some of the details are not yet known. However it might be argued that some broad principles are emerging, as follows:
 - The UK Government appears to be positioning future policy to apply more cuts to the welfare budget;
 - Some independent policy specialists have indicated that a prolonged period of reductions in Government spending may well now apply until 2020¹;
 - Whoever follows the coalition, it is now difficult to see how further cuts cannot be envisaged. The policy choice is simply where they will be applied;
 - Current Government policy appears, in particular to be targeting cuts to households which are larger households; are longer term recipients of Welfare; are younger; or are otherwise in receipt of larger value awards;
 - Policy announcements from the Government appear to be significantly strengthening the position which is proposed for welfare for families in longer term receipt of welfare and for those families making life choices while on welfare. Such "life choices" may include decisions which currently have the effect of increasing welfare payments, for example having additional children.

2.4 Welfare Reform

As a consequence of these changes, many of the households which the Council is attempting to profile for the CTR will at the same time potentially be impacted by other reforms. Our initial research suggests that many households which are affected by welfare reform may be affected by more than one change. The following table summarises at a very high level how some households may be affected. The analysis makes very high level assumptions in order to complete a very short summary of what remains in detail a very complex set of changes, but with that significant caveat the summary is presented in the following table:

¹ Tony Travers, Director, Greater London Group, London School of Economics. Conference paper to the Institute of Revenues, Rating and Valuation October 2012.

Table 2: Welfare Reforms 2013, & possible household impacts:

Welfare Change	Single	Single Parents	Households with Children	Pensioner Households	Disabled people
Council Tax Support	X			X	
"Bedroom Tax"		X		X	
Social Fund replacement					
Benefit Cap	X			X	
Restrictions to uprating					
DLA to PIP	X	X	X	X	
Universal Credit roll out - to be confirmed					

3 The Proposed Scheme

3.1 Overview

This section summarises the overall approach proposed by the Council.

3.2 The Financial Envelope

The Government is imposing a reduction in the funding of Council Tax Support at the same time as localising decision making for the scheme of awards. The reduction proposed is significant, and if the choice is made not to pass on the cost of the cut, then that money must be found from other sources.

While the calculation removes 10% of the estimated cost at a national level, the impact locally is expected to be very different. This is for the following reasons.

The proposed approach takes no account of:

- Any increase in Council Tax which may be applied from 2014/15; and
- The increase in the costs of awards under the scheme, and as claimants increase, or as claimants become eligible for more help; and
- The extent that the experience in the Borough differs from the national assumptions made by the OBR, DWP and DCLG.

3.3 The Scheme

The Council's proposed local Council Tax Support Scheme known as Council Tax Replacement is summarised as follows:

- The Council has proposed to adopt, substantially, the DCLG "Default" Scheme; this broadly mirrors the national Council Tax Benefit scheme which residents are familiar with.
- Under the Council's proposed approach, the rules and method for calculation will largely remain as current, and the maximum eligible amount of Council Tax Support for the calculation will remain 100% of eligible Council Tax;
- A local adjustment proposed is in respect of War Widows. The Council proposes to exempt such claims entirely from the payment of Council Tax. The incidence of such claims within the Council's records is very small. A review of the current records suggest that only 17 such cases are currently in payment.

4 Overall Impact Assessment

4.1 Overview

This section attempts to summarise the key impacts which may arise from the Council's proposed Local Scheme. The approach attempts to consider those impacts, where it is possible, with reference to the "Protected Characteristics" which the Council has a duty to consider.

The remainder of this section is organised as follows:

- At paras 4.2-4.11 below a discussion of the potential incidence of the Protected Characteristics within the claim population;
- At paras 4.12-4.13 overall interim conclusions are introduced.

4.2 Protected Characteristics and Data Sources

The Council have been able to capture and analyse data which has enabled the determination of possible impacts in relation to the following Protected Characteristics:

- Age;
- Disability
- Ethnicity; and
- Gender.

Insufficient information has been determined to enable initial conclusions in respect of gender reassignment; marriage and civil partnership; pregnancy and maternity; religion or belief; and sexual orientation. While the changes proposed under the Council Tax Replacement scheme are not designed or intended to militate against people within any Protected Characteristic, the Council does not, as regards these Protected Characteristics have sufficient information to reach any conclusions about the way in which the proposed changes may impact upon them.

4.3 Approach to data

There are two main sources of data which have been used to complete this initial assessment, as follows:

- A detailed analysis of the Council's core Benefits ICT systems for the processing of Benefits Claims has been undertaken. This provides an analysis of "real time" data, which is accurate at 25th September 2013, and which is an analysis of all Council records of claims in payment at that date; and
- In some instances, it has been possible to use published sources of nationally available information, and to support the Impact Analysis in aspects of the data which are not otherwise available from individual Council records. In particular, it has been possible to use:

- published data from the DWP to enable profiling of Council Tax Benefit costs per authority, and profiling of the increase in the cost of awards over recent years; and
- information from the Office of National Statistics (ONS) which has enabled higher level information regarding ethnic background of the population of London.

In all regards, it to be stressed that, insofar as this initial data analysis is concerned:

- The change to Council Tax Support , including particularly the change in funding which passes a significant part of the cost of awards to local authorities means that Billing Authorities are responsible for, and bear the cost of part of the awards i.e. the 10% reduction;
- There a very significant extent to which local Councils now bear a part of the risk of any increase in costs which occurs; and
- Planning for and managing the profile of claims under Council Tax Support will impact directly upon the cost base of Billing Authorities. It is therefore highly likely that Councils will have a significant interest in monitoring and managing forecasting of the cost of awards.

4.4 Summary of Impacts by Household Type

Within the following table, we summarise the impacts which may be considered in relation to segments of the local population eligible to receive Council Tax Benefit and Council Tax Support.

The Council's summary of impacts shown in this section is underpinned by a variety of data sources, including:

- The research which has been completed by the Council to support the preparation of the Impact Analysis of the Council Tax Support scheme;
- Other sources of appropriate external and internal research which are where referenced specifically explained with footnotes or otherwise.

Table 3: Impacts by Household Type, and by Claim value:

No.	Household Type	Equality Issue for consideration	Protected Characteristic of those affected	No.
Working Age Claimant Households				
1.	Working Age Claims (All)	Under the national scheme, any increases in Council Tax must be paid only by working age households.	Age	25,485
Pensioner Age Claimant Households				
2.	Pensioner Claims (All)	Under the national scheme, pensioner households are exempt from changes in Council Tax Support.	Age	9,725
Working Age Households with responsibility for young children				
3	Households with children	People with responsibility for children under five years	Age	4,890
		People with responsibility for children under 16		13,902
Working Age Disabled Households				
4.	Working Age , people with disability	Some groups with protected characteristics face the greatest barriers to work and as such are disproportionately represented within the claims population. This includes disabled people.	Disability	5,136
Working Age Single parents				
5.	Working Age, Single Parent,	Single parent families have higher numbers of claimants who are female. Women are therefore likely to be more represented within the claims population.. ² 96% of single parents within the Council's claim population are female	Gender	5,125

² Warwick Business School and Coventry Women's' Voices, 2012

4.5 Characteristics for which no data in the Benefits system

There are additional protected characteristics under the Equality Act which could also be dis-proportionally represented within the claims population because of barriers they are likely to experience to work, but for which the Council currently does not have sufficient data within Revenues and Benefits records to reach any conclusions. These include gender reassignment; pregnancy and maternity; religion or belief and sexual orientation.

4.6 Summary of the Overall Value of claims by Protected Characteristic

The following table summarises, in addition to the number of households which may be present within the claims population with protected Characteristics, the value of such claims:

Table 4: Summary of claims value and Protected Characteristic:

	No.	Value
Age: a) Pensioner Claims	9,725	7,988,980
b) Working Age claims	25,485	20,242,724
c) All claims	35,210	28,231,705
Working Age: young children,		
a) Under 5:	4,890	5,188,720
b) Under 16:	13,902	11,631,213
Disability: working age households in which specified benefits in payment	5,136	4,803,584
Gender: Single Parents, a) female	4,931	3,787,859
b) male	194	139,555

4.7 Protected Characteristic: Age, Working & Pensioner Age

The table below shows the distribution of working and pension Age claims for the Council.

Table 5: Working and Pension Age Claims

Working Age		Pensioner Age		Total	
No	Value	No	Value	No	Value
25,485	20,242,724	9,725	7,988,980	35,210	28,231,705

Interim Conclusions:

- The Council's overall value of claims is amongst the highest in London. The Councils with the larger caseloads may be argued to bear a consequently larger share of the financial risk which is being delegated to local government under the changes in funding for Council Tax Replacement, and in the event that claims costs increase but funding does not;
- The Council has a total of 35,210 customers currently receiving Council Tax Replacement.
- 25,485 of these customers are Working Age, and 9,725 are Pensioner households;
- Over 71% of households claiming Council Tax Replacement are working Age. The Council, in common with much of Central London, has high numbers of Working Age households;
- It is to be expected that there will be communities within the Borough which exhibit higher concentrations of claims, and there will be also communities within the Borough with a very low incidence of claims. It is likely that there will be a correlation with deprivation in these parts of the Borough.

4.8 Protected Characteristic: Age, Households with Children

The table below shows the distribution of household claims in which there are children. The definition in the following table considers households with children with reference to the age of 16 and under, in order to show the potential impact on all households with children rather than just the households with children under the age of 5 years.

Table 6 Age: Working Age Households with responsibility for Children

	Households with children under 5 years		Households with children under 16 Years	
	No.	Value	No.	Value
Total	4,890	5,188,720	13,902	11,631,213

Interim Conclusions:

- The Council has a total of 13,902 households with children under 16 in which CTR is in payment, which is just under 40% of the overall claims population;
- Of the households with children, 35% are households with responsibility for children under 5 years;
- National statistics have suggested the higher numbers of young families and of families with children in London. This finding would appear to be consistent with the data which has been analysed from the Council’s Benefits records.

4.9 Protected Characteristic: Disability

The barriers which are faced to work by disabled people are likely to mean that there will be higher numbers of disabled people within the claims population. Using a test of counting people with a “qualifying benefit” to understand the numbers of disabled people which may be present within the claims population allows an estimate to be made of the incidence within the claims population of disabled people. In the following table, the qualifying benefits which have been counted are:

- Care component of a Disability Living Allowance (Low, Middle or High);
- Attendance Allowance; and
- Support component of Employment Support Allowance.

Table 7: Working Age Households in which specified disability payments received

	Disability	
	No.	Value
Total	5,136	4,803,584

Table 8: Working Age Disability, by Benefit type

The following table shows the detailed totals for the Council of the benefits which have been calculated in the above overall summary table:

Benefit type	Working Age	
	No.	Value
DLA Care	4,685	4,425,627
AA	98	88,863
ESA Support Component	353	289,094
Total	5,136	4,803,584

Table 9: Working Age Carers income

The following table demonstrates the number and value of carers within the Council's Benefits caseload, with reference to a carers allowance being in payment:

Benefit type	Working Age	
	No.	Value
Carers Income	1,978	3,017,870

Interim Conclusions:

- There are a number of approaches which could be taken to evaluating the scale of incidence of disabled people within the claims population, and each has their own advantages and disadvantages;
- The above approach has been taken to both provide a degree of clarity in the test applied, through a qualifying benefit, and to attempt to mitigate against the risk of double counting;
- Nonetheless, this is likely to be an area of the evaluation which the Council will wish to keep under review, and amend as necessary.

4.10 Protected Characteristic: Gender, Single Parents

The table below shows the distribution of single parent claims for the Council.

Table 10: Working Age, Single Parents Households

Council	Single Parents			Total Claims	% Single Female	% of whole claim
	Male	Female	total			
Total	194	4,931	5,125	35,210	96%	14.55%

Interim Conclusions:

- There remain very high numbers of single parents who are female;
- There is a very high consistency within the analysis of single parents for the overall findings which have been completed within other Council impact analysis in respect of CTR in this regard, i.e. that very high numbers of single parent households in receipt of awards are female.

4.11 Protected Characteristic: Ethnicity

During December 2012, the Office for National Statistics published data from the 2011 census which showed the ethnicity of the population at the

Census date of March 2011. The data shows the profile both at the level of each country in the UK, and as well as for each local authority. The whole London summary is as follows:

Table 11: Ethnic Background in Inner London

	Percentage of population, by Ethnic Background						
	Total Population	White British	White other	Mixed heritage	Asian (All)	Black (All)	Other (All)
City of London	7,375	57.5	21	3.9	12.7	2.6	2.1
Hackney	246,270	36.2	18.5	6.4	10.5	23.1	5.3
H'mmrsmith & Fulham	182,493	44.9	23.2	5.5	9.1	11.8	5.6
Haringey	254,926	34.7	25.8	6.5	9.5	18.7	4.8
Islington	206,125	47.7	20.4	6.5	9.3	12.8	3.3
Kensington & Chelsea	158,649	39.3	31.3	5.7	10	6.6	7.2
Lambeth	303,086	39	18.1	7.6	6.8	25.9	2.5
Lewisham	275,885	41.5	12.1	7.4	9.3	27.2	2.6
Newham	307,984	16.7	12.3	4.6	43.5	19.6	3.4
Southwark	288,283	39.7	14.6	6.2	9.5	26.8	3.2
Tower Hamlets	254,096	31.2	14	4.1	41.2	7.3	2.3
Wandsworth	306,995	53.3	18.1	5	10.9	10.6	2.1
Westminster	219,396	35.2	26.4	5.2	14.6	7.5	11.1
Total	3,231,901	38.4	18.9	5.9	16.0	16.8	4.2

Interim conclusions:

- The Office for National Statistics data summarised above is publicly available data. It is therefore possible to analyse that data for the Council and for comparison purposes, for Inner London;
- The Office for National Statistics confirm, in their overarching analysis of this dataset, that London is the UK's most diverse city. Within London, Newham and Tower Hamlets exhibit the greatest diversity;
- To assist with the analysis of the data for this analysis, the analysis of ethnicity has been taken up to a high level, to group, for example, all types of Asian, Black, Mixed Heritage and Other backgrounds;
- There is not information within the Benefits ICT systems which can reach meaningful conclusions about the incidence of the protected characteristic of "Ethnicity" within the claims population.

4.12 Adverse impacts and mitigating actions

This section has set out the likely equality issues for the range of households affected by Council Tax Replacement, and the protected characteristics which may be most affected.

The Council's proposed scheme will continue to absorb the full cost of a CTR paid to a maximum of 100% eligible Council Tax. While the data above explains the incidence of households with Protected Characteristics within the claims caseload, where known, as the Council proposes to continue with a maximum eligible Council Tax of 100%, no other additional mitigating steps are proposed at this time.

4.13 Interim Conclusions

The interim conclusions from the Impact Analysis of the proposed Local Council Tax Replacement Scheme may be summarised as follows:

- The Government's policy to "Localise" decision making in local welfare relief on Council Tax is proposed at the same time as a cut in funding;
- As a consequence of the way that the UK welfare systems have operated to date, the profile of people currently receiving Council Tax Benefits contains higher numbers of households in which there is no work, or in which there is low income, or both;
- People facing the greatest barriers to work are represented in higher numbers in the claims population. That includes disabled people; people with responsibility for young children; and women;
- In more diverse communities, people who may struggle with English may also face those barriers to work;
- It may therefore be argued that any reduction in Benefit paid may be borne disproportionately by these groups, simply as a product of their higher representation within the claims population;
- Under the Council's proposed scheme, the maximum eligible Council Tax for the calculation of awards will remain at 100%.

5 The Local context: Trend Analysis

5.1 Summary of section

This section brings together contextual analysis which is designed to demonstrate the potential impacts of the proposed local scheme for Council Tax Replacement, and in terms of overall Claim value.

5.2 Increase in claims, All England and Wales

Government statistics demonstrate that the national value of awards under Council Tax Benefit has been increasing. Between 1997 and 2011, the total value of awards for Council Tax Benefit more than doubled from £2,014m to £4,299m. Within the following table, and using the Government's data, we summarise the growth in claims since 2005.³ It must be stressed that the figures provided by the DWP and DCLG summarise simply the overall increase in Council Tax Benefit payments, which includes increases both in claimant numbers as well as the increasing cost of Council Tax.

Table 12: Overall Council Tax Benefit Spend, England and Wales

	Total Council Tax Benefit Spend England	
	£m	Increase Percent
2005-06	3,230	6
2006-07	3,385	5
2007-08	3,471	3
2008-09	3,672	6
2009-10	4,095	12
2010-11	4,299	5

Interim conclusions:

- The national trend since 1997 has been that the value of awards has increased;
- The rate of increase throughout England and Wales over the period since 2000 has averaged 6%;
- If the rate of increase continues to increase, or within the Borough, continues to be greater than for the whole of England and Wales, and the "fixed grant" approach of the DCLG continues to apply for future years, then there will be a financial risk to the Council.

³ DWP Research published November 2012 by DCLG

5.3 Council Tax Benefit Awards in London

During the Autumn of 2012, the DCLG published research completed by the DWP and which is substantially based upon local authority Housing and Council Tax Benefit Subsidy returns. The datasets made available within this statistical release provide a very detailed analysis of overall benefits paid, and which enable the comparison of overall awards with other Councils.

Within the following table, the value of Council Tax and of Housing Benefits awards in Inner London for 2011/12 is shown:

Table 13: DWP Subsidised Awards, 2011/12, Inner London

Council	HB £m	CTB £m
Camden	185.95	26.57
City of London	5.61	0.25
Hackney	279.64	34.74
Hammersmith and Fulham	146.02	16.68
Haringey	261.08	36.99
Islington	194.15	29.54
Kensington and Chelsea	150.93	13.46
Lambeth	251.91	30.17
Lewisham	213.23	29.12
Newham	257.12	30.70
Southwark	208.46	28.01
Tower Hamlets	249.80	31.04
Wandsworth	197.68	11.18
Westminster	285.61	13.32
Total	2887.19	331.76

6 Conclusions

The changes to welfare benefits which begin from April 2013 are very significant. While the introduction of the Council Tax Support was amongst the first of those changes to become live from April 2013, it will not be the last.

Considered together, the cumulative impact of the changes which begin from this April is considered likely to be significant. The changes will be particularly keenly felt in those parts of the UK in which there are both increased levels of deprivation or greater household reliance upon welfare payments. Both arguments may be made in respect much of East London, and certainly within Tower Hamlets.

It has been possible within both studies to reach conclusions in relation to the protected characteristics of Age, Disability, Gender, and to an extent, Ethnicity. The Council does not conclude that the remaining protected characteristics are unaffected by these changes, rather that there is insufficient data available within the Benefits records to reach conclusions at this stage.

There is an incidence of households with these Protected Characteristics within the claims population, because of the barriers to work which are faced. With regard to the remaining Protected Characteristics, these may well be represented within the claims population, but at the current time, the Council has insufficient evidence available to reach conclusions.

The chief mitigating step which the Council effectively proposes at this time is to propose a local scheme for Council Tax Replacement which continues to apply a maximum eligible Council Tax of 100%.

Appendix 1: References

“Unravelling Equality? A Human Rights and Equality Impact Analysis of the Public Spending Cuts on Women in Coventry”, Warwick University and Coventry Women’s Voices, 2011,