Hull City Council

Equality and Human Rights Impact Analysis Form 2025

The purpose of carrying out this equality impact analysis is to provide evidence that you have paid 'due regard' to the different protected characteristics when making your decision upon the policy, service, or function. It is also a tool that will enable you to meet the 3 aims of the general equality duty:

1. **Eliminating unlawful discrimination**
2. **Advancing equality of opportunity**
3. **Fostering good relations**

Title of policy, project, service, function, or strategy?

Directorate:	Finance & Transformation
Service:	Revenues & Benefits
Lead Officer:	Amanda Renton
Date:	10 December 2025

Section 1. Introduction and Context
What is the aim of the policy, project, service, function, or strategy?
Annual agreement of the Policy on Local Council Tax Discounts and Exemptions, namely: • Local Council Tax discounts for working age people and families on low incomes. • Local Council Tax discounts for special constables and volunteer reserve forces. • Local Council Tax discounts for 2nd homes and domestic properties that are empty and unfurnished or uninhabitable requiring repair or having had repairs recently completed. Agreement to provide 12 months notice of intention to charge an additional 100% premium on 2nd homes from 1 April 2024 as allowed from that date by regulations. • Local Council Tax discounts for Care Leavers. • Local Council Tax additional premiums (sums due) on those domestic properties that have been empty for 2 years, 5 years or 10 years or more and agreement to provide 12 months notice of intention to reduce the 2 year timescale to 1 year from 1 April 2024 as allowed from that date by regulations. • Local Council Tax discount of 100% from date of purchase for up to 6 months for any disabled person having a property specially adapted • Local Council Tax discount of upto 100% for residents with a terminal illness diagnosis who have less than 12 months to live • Local Council Tax discount to provide support to those suffering extreme financial hardship

What outcomes will be achieved with the policy, project, service, function, or strategy?
The review of discounts is carried out annually to ensure that our policies remain lawful, that decisions are supported by evidence of need reflecting current local data. The renewing of the discounts and exemptions stated within the report will enable officers of the Revenues and Benefits service to continue to award the appropriate Council Tax discounts and exemptions to those that are entitled to them. The report also states intentions to amend one of the discounts from April 2026, this change will be to remove the means test requirement in the current scheme for care leavers aged between 21 and 24 years (inclusive). The report recommends a new Council Tax discount for those residents who have a terminal illness with less than 12 month's to live.
Please list the main people or groups that this policy, project, service, function, or strategy is designed to benefit and any other stakeholder involvement?
Direct Impact on: People on means-tested benefits Working households on low wages Residents experiencing temporary financial hardship Terminally ill residents Owners of long term empty properties and 2nd homes

Disabled residents where they have purchased property and it requires adaptations before they can occupy

Residents who are volunteering as special constables or those In the volunteer reserve armed forces.

Care leavers

Other Departments within Hull City Council:

Customer Services – supporting applications

Leaving Care Team – less administrative work (removal of means testing). Provision of data to Council Tax team

Young People's Scrutiny Panel – provided direct insight into the challenges and awareness gaps

Wider Local Community:

Residents impacted by empty properties/housing pressures – encourages property use, tackles long term empty properties, maximising the City's housing stock.

Community and voluntary organisations – supporting vulnerable groups

External Organisations:

Marie Curie & palliative care organisations

Are there any associated/ linked policies, services, or procedures? If yes, please detail: Yes ☐No☒

Section 2. Data and Consultation Feedback

This section forms a critical part of your equality analysis in meeting the requirements of the Equality Act 2010. Therefore, please ensure that there has been adequate and meaningful consultation undertaken with customers from protected groups. Please ensure that when consulting people are fully informed of any decisions that will change, reduce, or withdraw a service or benefit. *Please remember to contact the Corporate Business Intelligence Team to register with them any consultation you may wish to undertake, and to find any existing consultation and sources of data that the council may have which could assist your equality analysis.*
Please list and/or link to any recent and relevant consultation and engagement that can be used to demonstrate clear understanding of those with a legitimate interest in the policy/ service and the relevant findings.
Consultation with colleagues in the Leaving Care Team regarding the proposed scheme change for Care Leavers Consultation with Young People's Scrutiny Panel
If there is insufficient consultation or engagement information, please explain what action is being taken to obtain this information and when this consultation/engagement will be completed and available.
The consultation and engagement included above provides strong insight into who is likely to be most in need of the support provided by the care leaver discount. However, we do not know which residents have a terminal illness diagnosis with less than 12 months' left to live and so cannot consult with them directly.
Please list or link to any relevant service user/ customer or employee monitoring data and what it shows in relation to any Protected Characteristic

Age	Low income working households – anecdotally we are increasingly seeing the impact of the cost-of-living crisis on families with working parents who were previously managing, their income is too high to be eligible for benefits, but their living costs are higher than their wages. ***Older people*** Although welfare reform and austerity has had a much greater impact on working age people and families, older people are increasingly facing financial difficulties as a result of the cost-of-living crisis. Three-quarters of older people in the UK – 9.4 million people – are worried about the rising cost of living, https://www.ageuk.org.uk/latest-press/articles/2022/three-quarters-of-over-65s-admit-theyre-worried-about-rising-cost-of-living/. Older people are also more likely to be disabled and face the extra costs associated with this.
Disability	Families with members who have disabilities and health conditions – Disabled people face extra costs, such as equipment or appliances, as well as potentially higher costs such as higher heating bills due to immobility. Once we partially adjust income for these extra costs, around 50% of people in poverty are either disabled or living in a household with a disabled person. Sheffield's Joint Strategic Needs Assessment - Poverty (arcgis.com) Citizen's Advice reported in July 2024 that over 60% of those they helped with crisis support were disabled or have a long-term health condition.

Sex	From Nearly 3 million women paid below real Living Wage as gender pay gap widens | Living Wage Foundation, published 5 March 2025, Women are 50% more likely to be low paid than men, with 18.7% (2.8 million) of jobs held by women paid below the real Living Wage compared to 12.6% (1.8 million) of jobs held by men. Recent polling by the Living Wage Foundation explored the impacts on women of being on low pay. The findings paint an unsettling picture of women's experiences of life on low pay. [3] • 32% of low paid women skipped meals regularly for financial reasons. • 30% of low paid women visited a food bank in the previous 12 months. • 69% of low paid women said their mental health was negatively impacted. • 70% of low paid women said that their levels of anxiety were negatively impacted. • 33% said their relationship with their child was negatively impacted.
Gender reassignment	Currently there is very little-known relevant data on how those with this characteristic are affected. For those on low income and being supported through benefits, there may be occasions that to protect data relating to gender reassignment a claimant's DWP record may be restricted. This can potentially lead to delay in payments if not quickly rectified and handled sensitively, putting trans+ people at risk of struggling financially. Guide for trans claimants.pdf For those who are in the process of transitioning and have different names and/or genders logged on different systems. This may cause problems in managing benefits claims and cause delays in payment.

	These both may put trans+ people at risk of requiring additional support during these times. In addition to this we know 25% of trans people have experience homelessness at some point. LGBTQ+ and Homelessness - Statistics and Support | Crisis UK
Marriage and civil partnership	The cost-of-living crisis can negatively impact marriage and civil partnerships such as indirect discrimination in the workplace as employers could introduce policies or cuts to certain spousal benefits such as an end to flexible working that disproportionately disadvantages married employees or those in civil partnerships. This could include the removal of health insurance for spouses/partners or housing allowances that are reduced for dual-income households. The cost-of-living crisis may force couples to work longer hours or take on multiple jobs which affects work-life balance.
Pregnancy and maternity	Women in the UK have very low rates of maternity pay compared to their international peers. Statutory Maternity Pay (SMP) is paid for 39 weeks. The first six weeks are 90% of average earnings but this drops down to £194.32 per week for the remaining 33 weeks. Maternity Allowance – available to some (though not all) women who do not qualify for SMP, is paid at £194.32 for the full 39 weeks. Women, especially Black and Asian women, are overrepresented in low paid jobs with insecure contracts, leaving many without statutory benefits like maternity leave and pay. A shocking 9% of women take no maternity leave at all (not even the mandated recovery period) and for 11% of those women, the reason is that they simply cannot afford it. just over 10 percent of women benefit from occupational maternity pay (additional maternity pay paid by employers) whereas fifteen years ago, this was just under half. For the vast majority, maternity leave means a substantial reduction in income – to put this into perspective, women

	on basic rate SMP, or MA, are expected to live on less than half of the National Living Wage, or 37% of UK women's median weekly earnings. - Forced to return early - the impact of low rates of maternity pay - Maternity Action This also contributes to the disproportionate effect of the cost-of-living crisis has on women as a group.
Race	Nationally, the Joseph Rowntree foundation reported around 8 in 10 households with a black respondent to their surveys (81%) are at high risk of going without essentials. No end in sight for living standards crisis: JRF's cost of living tracker, winter 2024 | Joseph Rowntree Foundation

	This is reflected locally where Citizen's Advice reported the following breakdown in number of people receiving help with food bank referrals each month:

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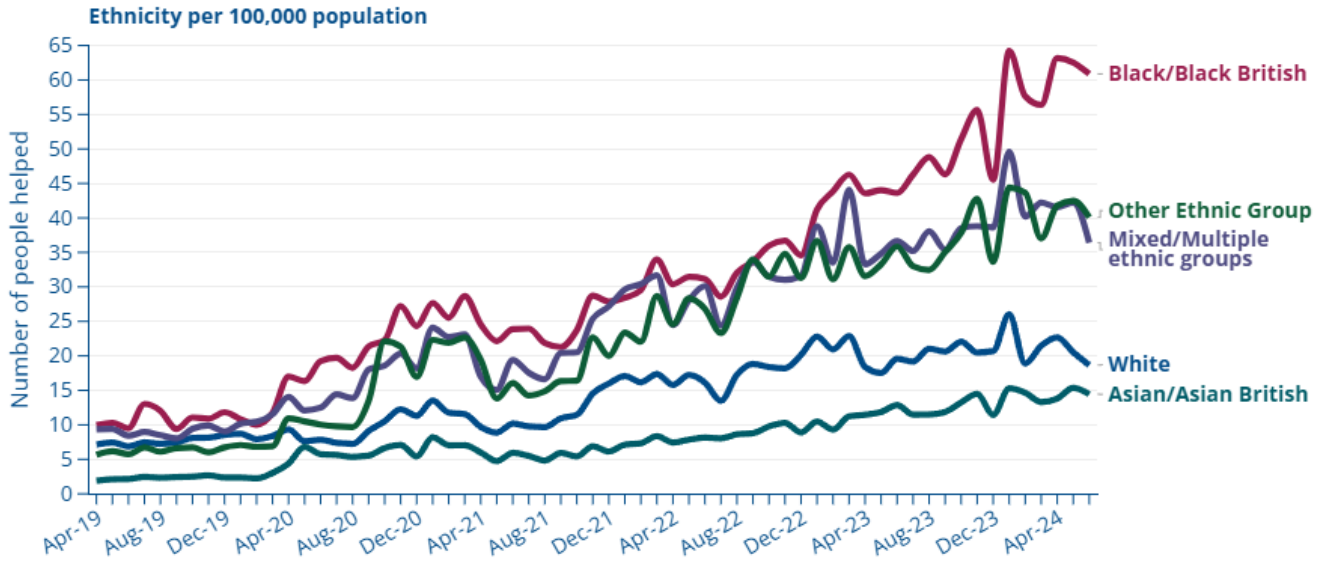
Rising energy and rent costs meant that the crisis got worse at the start of 2024, as we helped a record number of people with food bank referrals.

But these numbers dropped to the lowest levels since last summer. This is due to the £299 February Cost of Living payments hitting people's bank accounts. However, we've seen this number begin climb again in March and April.

Use the dropdowns to explore how many people we are helping with food bank referrals for different demographic groups.

The number of people we're helping with food bank referrals each month

Ethnicity per 100,000 population



You can access this visualisation directly here • Part of the decrease in some months (e.g. December) is caused by fewer working days as a result of bank holidays.
Note: Totals may vary across these charts as the same demographic information is not disclosed for all people we help. Data for England and Wales.

citizens advice

	How is the cost of living crisis affecting different groups? | Flourish, and a similar picture in their people helped with crisis support (food banks and emergency charitable support).
Religion and belief including non-belief	Currently no relevant data is known about this characteristic.
Sexual orientation	Trade Union Congress reported that 1 in 5 LGBT+ people shared that they had missed meals or went without food. 56% said they had cut back on food spending, 50% had reduced hot water, heating or electricity usage and 14% had missed a payment for a household bill. One in five LGBT workers have skipped meals or gone without food – TUC poll | TUC
Non-Statutory – Socio Economic	Based on the Index of Multiple Deprivation 2025, Hull is the fourth most deprived local authority in England (out of 317). Half of Hull's 166 geographical areas on which the IMD is based, are in the most deprived fifth nationally.

Section 3. Analysing the Impacts
Use service information, customer feedback and other evidence to determine upon who the policy/ service and any proposed changes will impact upon and how, highlighting where these are negative or positive, including where this could constitute unfair treatment, additional inequality or disadvantage or result in hardship and exclusion.

Against any identified negative potential impacts you must provide details of any action or options which could mitigate against this, and in serious cases, you should highlight where the Council would be advised not to proceed with a new or changing policy or service, including any proposals which are being considered. *Please use your action plan attached to this analysis to record the action and the monitoring which will take place to deliver such mitigation.*		
Protected Characteristic or Group	***Actual or potential positive outcome/ impact***	***Actual or potential negative outcome/ impact***
Age	**Council Tax Reduction Scheme**. The Government prescribe that under Local Council Tax Support schemes, Pensioners must be able to be awarded up to 100% support on their Council Tax. There is no option for a Local Authority to change this. For Working Age customers it is up to the Local Authority to set the level as to the percentage it expects that group to pay. In Hull this is 20%, which was set in 2014/15 following formal consultation. The proposal is that this remains at 80% for 2026/27. The scheme was also consulted upon for 2018/19 regarding a change to the	No disproportionate impact – no changes to this existing scheme.

	administration of the scheme and how claims for Universal Credit are treated within the overall processes of the scheme. No consultation has taken place for the scheme for 2026/27, as there are no changes being proposed and there is no requirement to consult unless the scheme is being changed. **Care Leavers** Care leavers aged 21-24(inclusive) will receive increased support and reduced administrative burden. This will address lower financial resilience among young people leaving care (83% struggling with essentials LGA/NLCBF data). Known barriers in the means-tested process and resulting arrears. **Terminal Illness** Terminally ill residents include older people who are statistically more likely to face end of life	Applications for support for young adults who were receiving care in another part of the Country who then move into the City will not be known to the Council so could miss out on the financial support available. Wider marketing/awareness of the support available will need to be carried out. This does not extend to those who have been in care in other countries before moving to the UK due to difficulty in being able to verify. To date, no applications have been received from care leavers now living

	poverty (Marie Curie evidence 24% of pension age people dying in poverty in Hull.	in Hull who formerly were in care in another country. This could be considered as indirect discrimination in relation to race.
Disability	**The Empty Property Disabled person discount** Cabinet agreed in 2022 that any disabled person buying a property that required adaptation before they could move in would be exempt from Council Tax for a period of up to 6 months whilst that work took place. This discount has been in place since 2022/23 will be continued in 2026/27 **Terminal illness** This discount directly supports people with life-limiting conditions, many of whom are disabled under the Equality Act definition. Reduced Council Tax liability reduces pressure linked to loss of income, higher care/transport and heating costs.	Requirement for SR1 form may disadvantage those with difficulty navigating clinical bureaucracy. Need to ensure support through Revenues and Benefits staff signposting.

Sex	**Terminal illness** Prevalence and caring responsibilities can differ by sex. Women are more often unpaid carers, men likely to have certain life-limiting conditions. This discount may reduce gendered financial pressure in these contexts.	
Gender reassignment	No aspects of the policy impact	Ensuring that all communications are inclusive. Potential administrative barriers if documentation does not reflect affirmed gender. Need to ensure inclusive customer service practices.
Marriage and civil partnership	Applications are available to households regardless of marital status. Applications can be made by individuals or jointly depending on household circumstances.	**Council Tax Reduction Scheme** **Discretionary Hardship Fund** Potential indirect discrimination if application processes or evidence requirements assume that all household members share finances equally (which may not reflect realities in

	Single applicants are not disadvantaged compared to couples – discounts based on eligible criteria, not relationship status.	some marriages or partnerships, including those in financial control or coercive situations). Households in breakdown (eg., separation but still living together) could face confusion or barriers when applying if processes are not sensitive to complex relationship dynamics.
Pregnancy and maternity	The discounts provide relief from paying full Council Tax charges across the different schemes supported. All schemes are accessible to those who are pregnant or on maternity leave.	
Race	No aspects of the policy impact	Applications for support for young adults who were receiving care in another country who then move into the City will not be known to the Council so could miss out on the financial support available. It is likely there will be barriers to confirming the care leaver status of the young person, and depending on visa status/type checks to ensure

		recourse to public funds would need to be done. Extending the age bracket increases the amount of people in this situation who are eligible. For example a young care leaver who moves from another country at age 18 on a work visa could be granted indefinite leave to remain at age 23. Consideration needs to be given as to how this can be navigated without indirectly disadvantaging those care leavers of different national origin in comparison to their UK peers.
Religion and belief including non-belief	No aspects of the policy impact	
Sexual orientation	Sexual orientation is not a data point collected during the application process for any Council Tax Discount. Hull City Council has a duty to ensure services are inclusive and non-discriminatory, including toward lesbian, gay, bisexual and other sexual minority residents.	

Non-Statutory – Socio Economic	The Council Tax discounts directly advance equality for households experiencing hardship. Terminally ill residents face income loss, poverty risk and high costs associated with illness. Care leavers experience structural socio-economic disadvantage. Discretionary Hardship Fund and Council Tax Reduction Scheme target low-income residents. Digital inclusion and accessibility - multi-channel access (digital, face-to-face, telephone and paper-based options are available). Ensuring accessibility for disabled residents, older people, people with limited digital access, and vulnerable care leavers. This reduces risk of indirect discrimination.	
Human Rights	The Rights which could be relevant under the Human Rights Act include: Article 3 – Prohibition of inhuman or degrading treatment (relevant if destitution risks are not	Understanding the discounts that are available and accessing this may be difficult where English is not spoken fluently.

	addressed). Protects the right by preventing destitution (Council Tax Reduction Scheme and Discretionary Hardship Fund). Article 8 – Right to respect for private and family life. Protects the right by enabling households to maintain stable living conditions. Article 14 – Prohibition of discrimination in the enjoyment of rights. Protects the right by providing equitable access without discrimination. The application process does not infringe on individuals' rights. Data protection protocols are in place to protect applicant privacy (Article 8 compliance). Support is based on need without discrimination, aligning with Article 14.	Proactively promote Council Tax discounts to groups who may not typically engage with Council services but are at risk of rights infringement due to financial hardship. Review application outcomes to ensure no group is systematically disadvantaged. Maintain and enhance data protection and confidentiality practices.

Have any gaps been identified and understanding of the impact of your changes to policy/function/service on customers? Please indicate whether you have identified ways of filling these gaps.	
Gaps in Data	**Action to deal with this**

Not all qualifying residents may understand the discounts available, know how to apply or feel confident navigating the system. Evidence on digital vs multi-channel access. Multi-channel access is offered but there is no data on which groups rely on non-digital routes, whether digital access issues correlate with protected characteristics or the overall user experience across channels.	Awareness campaigns: Adults and Children's Social care teams HCC Customer Service teams Advice sector (Citizens Advice) Ensure application forms are user friendly Provide assisted application support (Customer Services call centre and online chat) Track protected characteristics where appropriate Monitor data on digital access, including how many customers use phone, face-to-face, paper channels. Record the number of non-successful or incomplete applications. This will help us to identify whether certain groups face hidden barriers such as language, digital exclusion or disability related needs.

Summary of key findings, likely impacts and any mitigation

The Locally Defined Council Tax Discounts scheme strengthens support for those with the greatest need while maintaining fairness, legality and operational feasibility. The mitigation measures in place are proportionate, effective and aligned with the Council's equality and Human Rights duties. We will be looking at ensuring we have a better understanding of those accessing the discounts to ensure our schemes are reflective of residents needs and to ensure we understand the barriers they may have in learning about discounts or accessing them.

Section 4 – Equality Impact Action Plan (Please complete this Action Plan for any negative or unknown impacts identified in the Analysis above).			
Issue identified	Action required to reduce impact/mitigate	Timescale and responsibility	Monitoring and review arrangements
Lack of data gathered previously regarding protected characteristics for discount applicants may mean we are missing key target demographics. It also means we do not know who we are not reaching.	Look to analyse known data to understand gaps and create a plan to find ways of capturing this data.	Within the next 12 months Revenues & Benefits	

Improve the application journey.	Review web forms and paper application forms for plain language and accessibility. Provide a “hand-holding” service for terminally ill applicants	Within the next 3 months Revenues & Benefits	Monthly monitoring of applications for terminal illness
People with disabilities may face more barriers with an application process or with accessing written information.	Information and signposting will be available in multiple formats including braille and large print. Applications can be done over the phone, digitally, with in person support.		
Some may not have access to the internet, or may not make use of the internet to learn about discounts available, or to access digital applications. This may be linked to both socio-economic position or	Signposting and information will be widely available across council customer service centres. Information provided in paper form with annual Council Tax bills.		

characteristics such as age or disability.			
Those who are not confident in communicating in English may face barriers in learning about the support available and completing applications.	Information will be available in multiple languages. Support and sign posting will be available at locations that are able to utilise translators. VCS partners that work with communities where English may not be a first language aware of the discounts available.		
Married couples and civil partners who share household costs – indirect discrimination due to assumption of shared finances which may not reflect reality due to those in financial/coercive control.	Ensure the application process recognises that not all individuals in a marriage or civil partnership may have equal access to household finances.		

Where a marriage or partnership has broken down but are still living together may experience barriers.	Staff assessing applications should be trained to understand and handle complex household circumstances.		
Those who are of different national origin and were care leavers in a country outside the UK, but who do have recourse to public funds before they are 24 are going to be harder to identify and confirm eligibility, putting them at a disadvantage.	Work with the Leaving Care team and CYPFS to explore options on how to identify people this may apply to and understand the feasibility of ensuring this is able to be applied to people regardless of the location of their care experience.	Within the next 12 months	

Section 5. Quality assurance and publishing
Please ensure that before the finalised analysis is signed off by an officer of at least Assistant Head of Service level that it has been quality assured by a member of the Equality Team.

Senior Officer	Amanda Renton	Date:	21 January 2026

Equality Officer		Date:	27-01-2026