

Equality impact assessment

Income-related benefits: change to the non-dependant deduction rates

The non-dependant deduction measure

February 2011

Equality impact assessment for the change to the non-dependant deduction rates

Introduction

1. In his June 2010 Budget, the Chancellor of the Exchequer announced that there will be a staged increase in the rates of non-dependant deductions from April 2011. By April 2014, these increases will bring the deduction rates in the income-related benefits¹ where housing costs are payable to the level they would have been had they been fully uprated each year since 2001 to broadly reflect growth in rents. Uprating of non-dependant deduction rates for Council Tax Benefit will be broadly in line with increases in Council Tax since 2001.
2. These increases in rates will be provided for by way of legislation each year in the Social Security Benefits Uprating Order, and will be implemented as part of the Department's and local authorities' annual uprating exercises.

Scope of this assessment

3. The Department has carried out an equality impact assessment on the non-dependant deduction measure, assessing the proposal in line with the current public sector equality duties which require the Department to show due regard when developing new policies or processes to the impact of the proposals on race, disability and gender (including gender reassignment).
4. Wherever possible, we have also anticipated the new public sector duty being introduced by the Equality Act 2010 which comes into force from 6 April 2011. We have therefore considered the additional protected characteristics of age, sexual orientation, pregnancy and maternity and religion and belief.
5. If relevant, definitions have been amended to reflect the implementation of changes introduced by the Equality Act 2010. This, for example, covers the definition of disability, where we use the definition contained in the Equality Act rather than the overtaken Disability Discrimination Acts 1995 and 2005.
6. The Department uses an equality impact assessment tool and processes which are designed to help to ensure that:
 - the Department's strategies, policies and services are free from discrimination;
 - the Department complies with current equality legislation;
 - due regard is given to equality in decision making and subsequent processes; and

¹ Council Tax Benefit, Housing Benefit, Income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Income Support and Pension Credit

- opportunities for promoting equality are identified.

7. This assessment looks at the available evidence to determine the extent to which the effect of the proposed change differs between persons sharing a protected characteristic and persons who do not.

Brief outline of the policy or service

8. The long-established policy is that non-dependant adults living in the household of people claiming income-related benefits should contribute to the household costs of the accommodation where they live. Non-dependants are usually adult children, other relatives or friends. Partners, people under the age of 18 or people living in the household on a commercial basis (i.e. lodgers or sub-tenants) are not classified as non-dependants.

9. Non-dependant deductions are made from Housing Benefit and Council Tax Benefit, as well as from the support provided within the income-related benefits towards housing costs. Non-dependant deductions therefore affect benefit entitlement for both tenants and homeowners.

10. Standard deductions apply, based on the age and financial circumstances of the non-dependant, for example if they are in full-time employment or receiving benefit. The rate of deduction in respect of non-dependants who are in employment will reflect their gross weekly income. Where deductions are made, it is reasonable that the non-dependant will make a payment to the benefit customer, leaving the customer no worse off as a result of the deduction from their benefit.

11. Non-dependant deduction rates have been frozen since 2001 which has indirectly part subsidised the accommodation costs of non-dependants. In real terms, this represented a reduction in rates as they no longer increased in line with eligible rents and Council Tax. The absence of uprating has also been accompanied by other measures which have, over time, reduced the extent of non-dependant deductions (for example, from 2005, no deductions have been made where the non-dependant is in receipt of Pension credit).

12. The decision to uprate the non-dependant deduction rates in three stages to what they would have been had they been fully uprated since 2001 in line with growth in eligible rents and Council Tax was announced in the June 2010 Budget as part of a package of measures designed to bring Government expenditure under control and reduce the fiscal deficit. Uprating the non-dependant deduction rates is a reverse of the policy since 2001-02 to freeze the rates and is intended to provide a fairer deal for taxpayers and provide an expectation that adults make a reasonable contribution towards their housing costs.

Consultation and involvement

13. In common with other uprating measures, there has been no public consultation on the specific proposal to increase the non-dependant deduction rates although there has in the recent past been wide-ranging consultation on Housing Benefit reform and welfare reform more generally. This measure was announced in the June 2010 Budget and since then, we have been working with the Department of

Communities and Local Government, the Devolved Administrations, local authorities and stakeholders on both the detailed design of the measure and how it might work in practice. We have also met with groups representing local authorities and housing associations to listen to their concerns.

Impact of the non-dependant deductions measure

Impact on customers – general

14. The change will affect anyone in receipt of an income-related benefit that is subject to a non-dependant deduction. Any customer with a non-dependant resident in the household could potentially be affected, with the exception of those customers that are:

- registered blind;
 - receiving Attendance Allowance; or
 - receiving the care component of Disability Living Allowance.
15. Similarly, no deductions are made in respect of non-dependants who are:
- receiving Pension Credit;
 - aged under 18;
 - aged under 25 who are receiving Income Support or income-based Jobseeker's Allowance;
 - aged under 25 who are in the assessment phase (first 13 weeks) of income-related Employment and Support Allowance;
 - a prisoner;
 - a student (but in Housing Benefit only, and only if the claimant and any partner are under 65, there is a deduction in the summer vacation if they take up remunerative work); or
 - has been in hospital for 52 weeks or more.

16. In addition to Housing Benefit and Council Tax Benefit, non-dependant deductions can also be applied to awards of income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Income Support and Pension Credit where support towards housing costs are payable, such as support for mortgage interest. However, while we have looked carefully through our data sources, and have sought to include as much information as possible on the equality impacts of the non-dependant deductions measure, we have been unable to identify robust evidence on the detailed characteristics of the group of income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Income Support and Pension Credit cases where awards are subject to a non-dependant deduction.

17. In this assessment, we have therefore been able only to include detailed information on Housing Benefit and Council Tax Benefit cases where the awards are subject to non-dependant deductions. As a consequence, we can not say how many

benefit awards are subject to non-dependant deductions in total, but we estimate that around 300,000 Housing Benefit and Council Tax Benefit customers have their benefit awards adjusted to account for non-dependants in their home. We further estimate there are around 350,000 non-dependants living in households where such deductions are being made (Source: Single Housing Benefit Extract, June 2010).

18. Information on the level of deduction and the gross income bands used to set those levels is given in Table 1. Some 56 per cent of non-dependant deductions to Housing Benefit and Council Tax Benefit awards relate to non-dependants with a income of less than £180 per week, and nearly one fifth (19 per cent) of non-dependants living with Housing Benefit and Council Tax Benefit customers have a gross income of greater than or equal to £382 per week.

Table 1: Non-dependant deduction rates and income bands 2010-11, and the percentage of Housing Benefit and Council Tax Benefit non-dependant deductions that are made in each income band

Income Band 2010-11	Deduction Rates		% of deductions in income band ²
	Housing Benefit 2010-11	Council Tax Benefit 2010-11	
>=£382	£47.75	£6.95	19%
£306 - £381.99	£43.50	£5.80	6%
£231 - £305.99	£38.20		
£178 - £230.99	£23.35	£4.60	18%
£120 - £177.99	£17.00	£2.30	
<£120	£7.40	£2.30	56%
Others ³	£7.40	£2.30	

Source: Single Housing Benefit Extract, June 2010

Impact on families

19. The effect of the measure on family type is provided in Tables 2a and 2b. Table 2a shows that customers affected by the measure broadly reflect the characteristics of the Housing Benefit and Council Tax Benefit caseload as a whole, albeit with slightly more single people without children and slightly fewer lone parents. The majority of non-dependants themselves are single and without children (82 per cent).

² Source: Single Housing Benefit Extract June 2010

³ Age 25 or over and on Income Support or income-based Jobseeker's Allowance, age 18 and not in remunerative work or in receipt of main phase income-related Employment and Support Allowance.

Table 2a: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants by family type

	HB/CTB customers affected by policy	All HB/CTB customers	Non- dependants living with HB/CTB customers
Lone Parent	12%	19%	5%
Single	32%	26%	82%
Couple with children	7%	9%	2%
Couple with no children	9%	4%	4%
60 and over	40%	43%	8%

Source: Family Resources Survey 08/09 & Single Housing Benefit Extract, May 2010

20. Table 2b shows the family characteristics for customers and non-dependants only. A lower proportion of households with non-dependant deductions have children compared to the wider Housing Benefit and Council Tax Benefit population as a whole, so this policy has no disproportionate impact on families.

Table 2b: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants by family type (under 60 years old)

	HB/CTB customers affected by policy	All HB/CTB customers	Non- dependants living with HB/CTB customers
Lone Parent	20%	32%	5%
Single	54%	46%	89%
Couple with children	12%	15%	2%
Couple with no children	15%	7%	4%

Source: Family Resources Survey 08/09 & Single Housing Benefit Extract, May 2010

21. Less than 20 per cent of the Housing Benefit and Council Tax Benefit customers affected by the measure have dependent children (i.e. around 55,000 customers). Only 7 per cent of non-dependants have children (i.e. around 25,000 non-dependants). Further analysis using the Department's Policy Simulation Model has indicated that the number of children thought to be at risk of falling into poverty as a result of this measure is small. Overall we believe the effect on child poverty will be minimal.

Work incentives

22. This measure could potentially have a small adverse impact on work incentives as increasing the deduction rates would make it relatively more expensive for a non-dependant who has an increase in earnings and thus moves up an income band. While this could make it less attractive for a non-dependant to move into paid work, or increase their income in work, we would expect the impact of this measure on work incentives to be small.

23. While the introduction of the Universal Credit should help improve financial work incentives for benefit customers by ensuring that support is reduced at a consistent and managed rate as people return to work and increase their working hours and earnings, the detailed design of the treatment of non-dependants within the Universal Credit system has yet to be determined.

Household formation

24. This measure could potentially increase the rate of household formation where non-dependants leave the household due to the higher deductions that would be applied to the customer's benefit award. Where non-dependants are unable or unwilling to increase their remittances to the Housing Benefit and Council Tax Benefit customers with whom they are resident, they may choose, or be asked to leave the household. Some non-dependants forming their own households may also have an entitlement (when in their own household) to receive Housing Benefit and Council Tax Benefit.

25. While we have not been able to estimate the scale of this potential behavioural effect, it is likely that even, after the measure has been implemented, most non-dependants would still be financially better off remaining as a non-dependant, and we would therefore expect any effect on household formation to be minimal.

26. The most recent research of which we are aware into the impact of non-dependant deductions is from the 1996 Department for Social Security research report No. 43, "*Paying for Rented Housing*"⁴. Although this report is dated, and the evidence was not conclusive, the report suggested that non-dependant deductions had little direct impact on the housing decisions of non-dependants – that is, whether or not they decide to stay with benefit customers or move out and potentially form their own household.

Tenure

27. Table 3 shows the largest group of customers affected by the measure live in the social rented sector (made up of local authority and housing association accommodation), with 49 per cent of customers affected by the measure and 52 per cent of non-dependants living in this sector. Thirteen per cent of customers affected by the measure are owner-occupiers in receipt of Council Tax Benefit. While the non-dependant deduction rates for Council Tax Benefit customers are lower than for Housing Benefit customers, it is likely that some customers in the owner occupier group could also have awards of income related benefit that include an element of

⁴ <http://research.dwp.gov.uk/asd/asd5/rrep043.pdf>

mortgage interest costs which are subject to non-dependant deductions. But we do not know how many this would be, due to the limitations of our data sources.

Table 3: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants by tenure of Housing Benefit or Council Tax Benefit customer

	HB/CTB customers affected by policy	All HB/CTB customers	Non-dependants living with HB/CTB customers
Social Rented	49%	52%	52%
Private Rented	18%	23%	15%
Owner Occupier	33%	18%	33%
Other⁵	0%	7%	0%

Source: Family Resources Survey 08/09 & Single Housing Benefit Extract, May 2010

Cumulative impacts

28. While the decision to uprate the non-dependant deduction rates for the income-related benefits was taken as one of several measures affecting Housing Benefit, the results given in this assessment are for the non-dependant deductions measure individually. The Department has published a separate equality impact assessment⁶ on the measures to change the Local Housing Allowance arrangements and the Housing Benefit size criteria for people with non-resident overnight carers also being introduced from April 2011.

29. It is likely that some customers affected by the non-dependant deductions measure will also be affected by one or more of the other changes to Housing Benefit announced at the June 2010 Budget. However, where customers affected by the non-dependant deductions measure are also affected by one or more of the other Housing Benefit changes, constraints in the data available limit the degree to which we can draw upon quantitative evidence and provide reliable information on any potential cumulative impacts.

Impact on protected groups

30. The assessment of the effect of the changes to the Housing Benefit and Council Tax Benefit non-dependant deduction rates broken down by gender, disability, race and age has been based on analysis using data from the Family Resources Survey. We have also included an assessment of the effect on families (paragraph 19) and child poverty (paragraph 21)

31. These breakdowns have been provided for the Housing Benefit and Council Tax Benefit customers directly affected by the measure, and the non-dependants of customers affected by the measure who in theory could be expected to make additional contributions toward the running of the home as a result of the change. For

⁵ Includes people living rent free and squatting

⁶ <http://www.dwp.gov.uk/docs/lha-and-carers-eia.pdf>

context, we have also provided information on the Housing Benefit and Council Tax Benefit caseload as a whole.

32. As the Family Resources Survey is based on a sample of data from around 25,000 households (only a small number of whom are subject to non-dependant deductions from Housing Benefit and/or Council Tax Benefit), we therefore advise that the analysis presented in this Equality Impact Assessment should be treated with caution as results derived from small sample sizes may be subject to elevated variability and change over time.

33. Non-dependant deductions can also be applied to awards of income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Income Support and Pension Credit where support for housing costs are payable, such as support for mortgage interest. While we have sought to include as much information as possible on the equality impacts of the non-dependant deductions measure, our ability to look at all groups affected by policy is often constrained by the limitations of our data sources. For this assessment, we have therefore been able to include detailed information only on Housing Benefit and Council Tax Benefit customers whose awards are subject to non-dependant deductions.

Impacts and analysis

34. The analysis below gives information on the characteristics of the households, benefit customers, and the non-dependants that may be affected by the measure. The cash impact on the benefit awards for each customer affected will depend on the level of their Housing Benefit awards and the income band of the non-dependant resident in the household, and there is currently no evidence that any of the groups considered below will be disproportionately affected by the measure in terms of their cash awards.

Gender

35. As Housing Benefit and Council Tax Benefit are assessed on overall household income, rather than distinguishing between male and female recipients of these benefits, the classification at the household level has been made as 'couples', 'male' and 'female', - the latter two describing those without a partner. This breakdown by gender is shown in Table 4.

36. The proportions of affected Housing Benefit and Council Tax Benefit customers who are female (47 per cent), male (23 per cent) and couples (30 per cent) are broadly consistent with the Housing Benefit and Council Tax Benefit caseload overall, albeit with a slightly higher proportion of those affected by the measure being couples as compared with the Housing Benefit and Council Tax Benefit caseload as a whole. Of non-dependants living with Housing Benefit or Council Tax Benefit customers, some 59 per cent are single males.

Table 4: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants, by gender

	HB/CTB customers affected by policy	All HB/CTB customers	Non-dependants living with HB/CTB customers
Female	47%	50%	34%
Male	23%	26%	59%
Couple	30%	24%	7%

Source: Family Resources Survey 0809 & Single Housing Benefit Extract May 2010

Conclusion

37. The gender breakdowns of the group of customers affected by the measure broadly reflects the makeup of the Housing Benefit and Council Tax Benefit cohort as a whole, so no individual group appears to be disproportionately affected in this regard. However, in terms of the non-dependants themselves, these are single males predominantly, which implies that this group may be at risk of being disproportionately affected by the measure.

Age

38. Table 5a displays the breakdowns for the effect of the non-dependant deductions measure by people aged under 60, and the 60 and over group. Sixty per cent of customers affected by the measure are under 60 (i.e. working age), while 40 per cent⁷ are 60 or over, compared to 57 per cent of Housing Benefit and Council Tax Benefit customers overall who are under 60. The majority of non-dependants living with Housing Benefit and Council Tax Benefit customers are under 60 (92 per cent).

Table 5a: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants by age

	HB/CTB customers affected by policy	All HB/CTB customers	Non-dependants living with HB/CTB customers
Under 60	60%	57%	92%
60 and over	40%	43%	8%

Source: Family Resources Survey 08/09 & Single Housing Benefit Extract, May 2010

39. Table 5b gives more detailed information on the age distribution of the under 60 age group. Housing Benefit and Council Tax Benefit customers affected by the measure are mostly over 45 (58 per cent), a higher proportion than in the wider Housing Benefit and Council Tax Benefit caseload under 60 (36 per cent). The non-dependants themselves are mostly young, with 41 per cent being under the age of 25.

⁷Analysis based on the Family Resource Survey 2008-09, the Single Housing Benefit Extract puts the proportion of Housing Benefit and Council Tax Benefit customers affected by the policy who are 60 and over at 48 per cent

Table 5b: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants by age band (under 60 years old)

	HB/CTB customers affected by policy	All HB/CTB customers	Non- dependants living with HB/CTB customers
Under 25	15%	12%	41%
25-34	8%	24%	33%
35-44	20%	28%	13%
45-59	58%	36%	12%

Source: Family Resources Survey 08/09 & Single Housing Benefit Extract, May 2010

Conclusion

40. In high level terms, the age profile of the Housing Benefit and Council Tax Benefit affected by the measure broadly reflect the characteristics of the wider Housing Benefit and Council Tax Benefit, albeit with some discrepancies within the individual age bands, so no group appears to be disproportionately affected in this regard.

41. In terms of the non-dependants themselves, these are predominantly under 60, which implies a potential disproportionate impact on this group. Looking at the group of non-dependants under the age of 60 more closely, these are mostly in the younger age categories, with around three quarters being less than 35 years old, and this suggests that younger people may be disproportionately affected by the measure.

Disability

42. The definition of disability for the purposes of equality impact assessment is now that contained in the Equality Act 2010, and was previously that defined by the Disability Discrimination Act. The breakdowns for the effect of the measure on disabled customers of Housing Benefit and Council Tax Benefit are displayed in Table 6, which uses self reported information in the Family Resources Survey on whether the customer is disabled under the terms of the Disability Discrimination Acts of 1995 and 2005.

43. A slightly lower proportion of Housing Benefit and Council Tax Benefit customers with non-dependant deductions have a disability (64 per cent) compared to the Housing Benefit and Council Tax Benefit caseload overall (68 per cent). Some 33 per cent of non-dependants living with Housing Benefit and Council Tax Benefit customers are disabled.

Table 6: Housing Benefit and Council Tax Benefit customers with non-dependant deductions, and non-dependants, by disability

	HB/CTB customers affected by policy	All HB/CTB customers	Non- dependants living with HB/CTB customers
Self Reported DDA Disability	64%	68%	33%
No Self Reported DDA Disability	36%	32%	67%

Source: Family Resources Survey 08/09

Conclusion

44. A lower proportion of disabled customers are affected by the measure than their share of the Housing Benefit and Council Tax Benefit cohort as a whole, and this is likely to be due to the fact that no non-dependant deductions are made from Housing Benefit and/ Council Tax Benefit customers also in receipt of Attendance Allowance or the care component of Disability Living Allowance.

45. Around one third of non-dependants have a disability, compared to around one in seven working age adults and almost one in two people over state-pension age in the general population⁸. Given the mostly working age profile of non-dependants (Table 5a), this implies that the disabled group may be at risk of being disproportionately affected by the measure. However, we would expect the majority of disabled non-dependants to be out of remunerative employment, thereby falling into the lowest income band and attracting the smallest level of deduction. Where this is the case, the lower cash losses for customers with disabled non-dependants may offset the potential disproportionate impact on this group.

Mitigation

46. The trebling of the Discretionary Housing Payment funds for local authorities is intended to give them flexibility to sustain some tenancies where it would not be cost effective for a disabled non-dependant to move because the existing accommodation has been adapted to their needs, or their moving would be detrimental to the tenant or the non-dependant.

Race

47. Table 7 shows the racial breakdowns (i.e. white and ethnic minority) for the customers affected by the measure, non-dependants living with Housing Benefit and Council Tax Benefit customers, and the Housing Benefit and Council Tax Benefit caseload as a whole.

48. Limitations in the data limit the extent to which we can draw on quantitative evidence and provide information on the different groups that comprise the wider ethnic minority group, but we intend to monitor any potential negative impacts through our ongoing contacts with stakeholder groups.

49. A higher proportion of Housing Benefit and Council Tax Benefit customers affected by the measure are from ethnic minorities (16 per cent) than their share of

⁸ Source: Family Resources Survey 08/09

the wider Housing Benefit and Council Tax Benefit caseload (10 per cent). Around 26 per cent of the non-dependants themselves are from the ethnic minority group.

Table 7: Housing Benefit and Council Tax Benefit customers with non-dependant deductions by ethnicity

	HB/CTB customers affected by policy	All HB/CTB customers	Non-dependants living with HB/CTB customers
White	84%	90%	74%
Ethnic minority	16%	10%	26%

Source: Family Resources Survey 08/09

Conclusion

50. A higher proportion of ethnic minorities appear to be affected by the measure, both in terms of customers and the non-dependants themselves, than their share of the wider Housing Benefit and Council Tax Benefit, and indeed their share of the wider population, and this implies a potential risk that this group may be disproportionately affected. This may, in part, reflect the differences in living arrangements across ethnic groups, such as extended families. According to the latest available official statistics⁹, around 11 per cent of the England and Wales population was from an ethnic minority (figures from 2007).

Overall equality impact conclusion

51. The characteristics of the cohort affected by the non-dependant deductions measure appears to reflect the characteristics of the wider Housing Benefit and Council Tax Benefit caseload, except in relation to race, where a disproportionate number of ethnic minorities appear to be affected.

52. While non-dependants themselves are not directly affected by the measure, we believe it is reasonable that where deductions are made the non-dependant will make a payment to the benefit customer, and in many cases these payments may increase in light of this measure to raise the deduction rates.

53. Where non-dependants are asked to make higher payments to the benefit customer, we expect that a disproportionate number of these would be from single males, with younger, working age people also disproportionately affected as a group. Taking into account the age profile of non-dependants, a disproportionate number of these appear to be disabled, compared to the proportion of the wider population that are disabled, so this group may be at risk of a disproportionate impact.

54. Evidence also suggests that ethnic minorities may also be disproportionately affected, as the proportion of non-dependants that are from ethnic minority groups is significantly higher than the proportion of the wider population that are from these groups.

⁹ http://www.statistics.gov.uk/downloads/theme_population/Tables_EE1-EE6_2007.xls

Next steps: further monitoring and evaluation

55. We are committed to monitoring the impacts of its policies and we will use evidence from a number of sources on the experiences and outcomes of the protected groups.

56. We will use administrative datasets to monitor trends in the benefit caseloads for the protected groups and in the level and distribution of benefit entitlements. The administrative data will provide robust material for age and gender although not, as a rule, for the other protected groups.

57. We will monitor the impact of this policy through Housing Benefit data we routinely collect from local authorities, and from other applicable data sources such as the Family Resources Survey.

58. We will look to improve our understanding of non-dependant deductions made from awards of other income-related benefit where support for housing costs are payable such as support for mortgage interest.

59. We will also be discussing with other government departments, the devolved administrations and other stakeholder groups other ways in which we might monitor and evaluate the impact of these changes.

60. We will use survey data (for example the Family Resources Survey and Labour Force Survey) to assess trends in the incomes of the protected groups and in the employment outcomes.

61. We will use qualitative research and feedback from stakeholder groups to assess whether there are unintended consequences for the protected groups, and whether the policy is resulting in adverse consequences for particular groups.

62. We will utilise feedback from Departmental employee networks and internal management information. For example we will monitor the level of appeals and complaints in order to assess the broader impact of the policy.

63. We will draw on broader DWP research where appropriate, as well as any research commissioned specifically as part of the evaluation of the measure?

64. The material in this Equality Impact Assessment covers the equality groups currently covered by the equality legislation, i.e. age, disability, gender (transgender), and ethnicity. For the age and gender strands we have good quality information from both the administrative and survey data, while for ethnicity and disability we have reasonable information from the survey data. From 2011 sexual orientation, religion and pregnancy/maternity will also be covered by the equality legislation; with the exception of maternity, these groups will not be captured in the Departmental administrative information. We have requested for information on religion and sexual orientation to be included in the main survey used for low income and poverty analysis from April 2011. Also, as part of our actions in the context of the data requirements under the Equality Act, we are looking across DWP activities to identify and address further gaps in data provision wherever reasonable.

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