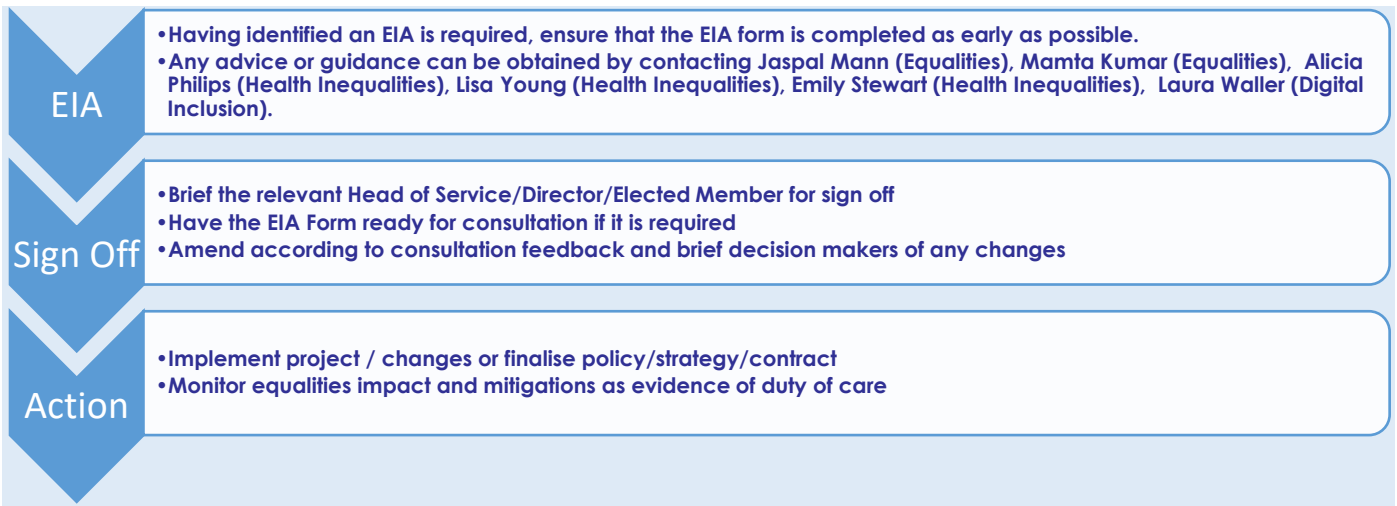


Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Council Tax Support Scheme 2025/2026	
EIA Authors	Name	K Gist	L Sharma
	Position	Benefits Manager	Benefits Subsidy & Policy Lead
	Date of completion	November 2024	
Head of Service	Name	B Strain	
	Position	Head of Revenues and Benefits	
Cabinet Member	Name	CLlr R Brown	
	Portfolio	Strategic Finance and Resources	



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*)



1.2 In summary, what is the background to this EIA?

Council Tax Support (CTS) is a means tested assessment to support low-income households with the cost of council tax payments. In 2013, design of the CTS scheme for working age households was devolved to Local Authorities and funding from central government was reduced by 10 per cent.

Budgetary challenges faced by the Council for 2025/26 require the Council to review the potential option to reduce the amount provided through the CTS scheme for working age households.

The proposals would take effect from 1 April 2025.

Note: CTS scheme for people of pension age households is set in law by the Government. Therefore, this document only refers to scheme changes in respect of working age households.

Proposed change 1 - Reduction of maximum support

In Coventry the current maximum support for working age households is 80%.

If the current scheme continues in 2025/26, Coventry expects to award approximately £28.2 million in council tax support to 24,139 households. Approximately £16.8 million relates to working age claims and £11.4 million to pension age.

However, in setting the CTS scheme for 2025/26, the council is managing the competing tasks of balancing the budget, alongside supporting low-income households. Lowering the maximum support would provide the council savings towards the gap in its budget.

Therefore, the proposal is to reduce maximum CTS entitlement from 80% to 75%.

The Council currently (2024-2025) operates an income banded scheme, as shown in the table below:

Table 1: income banded scheme 2024-2025

Band	Weekly excess income threshold	CTS award (% of council tax bill)	Number of households
1	£0 to £15	80%	15,336
2	£15 to £40	65%	343
3	£40 to £70	40%	431
4	£70 to £80	20%	151
5	£80 and more	0%	

The proposal to reduce maximum CTS entitlement from 80% to 75% will only impact those in Income band 1. There will be no impact from this proposal for those in income bands 2 to 5.



Table 2: income banded scheme 2025-2026

Band	Weekly excess income threshold	CTS award (% of council tax bill)	Number of households
1	£0 to £15	75%	15,336
2	£15 to £40	65%	343
3	£40 to £70	40%	431
4	£70 to £80	20%	151
5	£80 and more	0%	

Summary of likely impact of proposed changes

From initial modelling undertaken for the proposed change to the Council Tax Support scheme, the following are some key impacts which have been identified:

- These changes will provide £1million towards the gap in the Council’s budget.
- As maximum support will be reduced from 80% to 75%, the majority of all working age households will have a reduction in support, regardless of protected characteristics.
- All working age households in income band 1 will be affected regardless of any protected characteristics.

Table 3: shows the impact of the proposal to change the CTS scheme

Impact of proposed CTS changes	Total
Number of decreased claims	15,336
Average weekly CTS decrease	£1.31
Number of increased claims	0
Average weekly CTS increase	N/A

Mitigations for protected characteristics

No Mitigations

Table 4: Impact of changes for different groups in Income Band 1

	Average weekly loss	Number of households	%
Households with Children	£1.32	3559	23%
Households no children	£1.31	11777	77%
Households with a disabled adult	£1.35	5898	38%

Table 5: Impact of changes by gender

CTS awarded to males	5899	38%
CTS awarded to females	9437	62%



Proposed Change 2:

Proposal 2 is to give additional support where a resident is made liable for Council Tax for 2 homes if:

They have left their original home through fear of violence.

Changes for disabled people are being made in their new home, like a wet bathroom or stairlift

They have moved within the last 4 weeks and are still liable to pay Council Tax for their original home

This change will mean that where a person is liable for Council Tax at their original home as well as at the property they have moved to, they can claim CTS at both addresses.

Public Engagement

Coventry City Council will undertake a public consultation on the proposals to the Council Tax Support scheme. The results of this will be used to inform decisions about the proposed model.

A variety of methods will be used to ensure the consultation is accessible to all Coventry residents.

Methods will include:

- a mailshot to all working age households currently in receipt of Council Tax Support
- phone support, as alternative method of engagement
- information in an alternative language, if requested
- information through a Let's Talk page on the Council's website
- feedback through a survey
- Stakeholder meeting.

This is not an exhaustive list.

1.3 List of organisations and people who are involved in this area of work

- Coventry residents
- Benefits Service
- Financial Management
- Legal Services
- Council Tax collection and enforcement teams
- Public Health Insight team
- Advice agencies and third sector organisations
- Social landlords
- Precepting authorities
- Policy in Practice
- Airey Consultancy Service Ltd



SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

- Please include an analysis of the equalities data your service holds. This could include surveys, complaints, compliments, management information and customer profiles. *(Please refer to Diversity Guide)*
- Where possible compare your data to local data using
 - Facts about Coventry
 - Census 2011
 - Census 2021
 - JSNA

Proposed Change 1

In Coventry, Council Tax Support is currently awarded to approximately 16,200 working age households (aged 18 to 65).

Of this, approximately:

23% of households have children (aged 0 to 17).

38% of households have an adult disabled household member.

62% of Council Tax Support is awarded to females and 38% is awarded to males.

For the purposes of Council Tax Support, data is not routinely collected the following equality groups:

- Gender reassignment
- Pregnancy or maternity
- Race
- Religion and Belief
- Sexual orientation



Table 6: Impact of changes by area and deprivation score.

Geography	2015	2019
Bablake	16.85	17.16
Binley and Willenhall	41.00	35.00
Cheylesmore	20.00	17.00
Earlsdon	9.00	9.00
Foleshill	50.00	45.00
Henley	32.00	32.00
Holbrook	28.28	27.59
Longford	32.00	32.00
Lower Stoke	27.00	24.00
Radford	35.00	33.00
Sherbourne	21.00	19.00
St Michael's	30.00	30.00
Upper Stoke	30.00	28.00
Wainbody	9.00	9.00
Westwood	26.00	24.00
Whoberley	18.00	16.00
Woodlands	19.00	18.00
Wyken	20.00	20.00

Table 6 highlights the impacted areas of Coventry by index of deprivation. The higher the score the more deprived the area is. 18 areas of Coventry will be impacted. Over 88% of the areas are where the deprivation score is 10 and above.

Proposed Change 2

The team are unable to share data by protected characteristics and geographical locations due to low number of residents impacted.

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2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

**Any impact on the Council workforce should be included under question 5.0 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-17	P N	<p>Proposed Change 1 and 2</p> <p>As covered in section 1.2, Table 4 shows 15,336 households will receive decreased support. However, their protected characteristics are not known.</p> <p>As shown in section 2.1, 23% of the CTS households have dependant members in this age group. So, this group would be impacted through the CTS claim typically made by their parents.</p> <p>The proposed changes will affect all households in income band 1 and 94% of the total number of households in receipt of CTS.</p>
Age 18-65	P N	<p>Proposed Change 1</p> <p>Working age CTS customers are typically aged between 18 and 65, so this group will be directly impacted by the proposed changes. As covered in section 2.1, Table 4 shows 15,336 households will receive decreased support. However, their protected characteristics are not known.</p> <p>Proposed Change 2:</p> <p>Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift

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		<ul style="list-style-type: none"> Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Age 66 and over	NI	Pension age customers are those aged 66 or over. The rules governing CTS for people of pension age households are prescribed nationally by the Government, so will not be affected by the proposed change to the CTS scheme.
Disability	P N	<p>Proposed Change 1 As covered in section 2.1, 15,336 households will receive decreased support.</p> <p>38% of those households in receipt of CTS support have an adult disabled member.</p> <p>Therefore, the proposed changes, are likely to impact people in this group through reduced CTS.</p> <p>Proposed Change 2: Will positively impact residents who</p> <ul style="list-style-type: none"> Have left their original home through fear of violence. Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Gender reassignment	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their gender reassignment.
Marriage and Civil Partnership	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p> <p>Data for marriage and civil partnership is not routinely collected for CTS purposes.</p> <p>Proposed Change 2 Will positively impact residents who</p>

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		<ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Pregnancy and maternity	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p> <p>Data by pregnancy and maternity is not routinely collected unless the Benefits Service is specifically notified, so firm conclusions in relation to equality impact cannot be drawn.</p> <p>Females who are pregnant or on maternity leave may be more likely to seek support through the CTS scheme due to low income, but there is no data to confirm this.</p> <p>Proposed Change 2: Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Race (Including: colour, nationality, citizenship ethnic or national origins)	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their race.
Religion and belief	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their religion or belief.
Sex	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p>

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		<p>As shown in section 2.1, in Coventry, around 68% of CTS support is to females</p> <p>The support for all band 1 households will be reduced, which means females will be impacted to a greater extent.</p> <p>Also, research evidence regarding gender and poverty indicates females are more likely to be living in financial hardship than males. Therefore, the proposed changes are likely to further exacerbate that hardship.</p> <p>Proposed Change 2:</p> <p>Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Sexual orientation	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their sexual orientation.

SECTION 3 – HEALTH INEQUALITIES - See the health inequalities pre EIA guidance sheet for this section.

3	Further information on health inequalities is available on the Intranet
<p>3.1 Please tell us how the proposal you are submitting this EIA form will reduce health inequalities: <i>Please include which Marmot Principles this work covers.</i></p> <p>Coventry is a Marmot City. The proposal to change the Council Tax Support scheme is based upon using a Proportionate Universalism resource allocation approach. This ensures that the Council will allocate its resources across the social gradient, proportionate to people's needs.</p> <ul style="list-style-type: none"> • Council Tax Support scheme primarily supports the Marmot principle: <ul style="list-style-type: none"> - Ensure a healthy standard of living for all • Council Tax Support scheme also supports the Marmot principles: <ul style="list-style-type: none"> - Enable all children, young people, and adults to maximise their capabilities and have control over their lives - Create fair employment and good work for all 	



3.2 What information do you have to show you are going to reduce health inequalities:

The Council, like many households, is seeing significant increases in expenditure as a result of rising prices. So far, the money the Council receives from Government and through council tax and business rates, has not increased in line with the increasing cost of providing services. The result is that in 2025/26, the Council's spending is now forecast to exceed its income by over£ 10million. The Council must, by law, set a balanced budget each year which means the amount planned to spend cannot be more than the income expected to receive. We are therefore looking at a number of ways that we could reduce Council spending, or increase income, to ensure that we are able to continue providing our most essential services. One of the options is to increase the amount of council tax income the Council receives by reducing the maximum amount of CTS provided to working age households.

Modelling data for CTS claims based upon the proposal, shows the changes will provide £1million towards the gap in the Council's budget, which will help in setting the above budget and allocation of services and resources.

The outcomes are likely to be:

- As maximum support will be reduced from 80% to 75%, the majority of households will have a reduction in support, regardless of protected characteristics.
- All households in income band 1 will be affected regardless of any protected characteristics.
- Households facing financial hardship who may be adversely impacted by these changes, will be supported if they make early contact with the Council Tax department. The Council will aim to provide households with the right support and agree where possible, affordable payment plans.

3.3 Who/which groups of people might face the biggest health inequalities for your work and why:

Residents in Coventry who are in receipt of Council Tax Support are those groups of people who are more likely to be impacted by the proposed changes.

The Council Tax Support scheme aims to support low-income households and those groups who are known to face the biggest health inequalities.

This is shown by the data for Coventry in section 2.1 – see Table 4

3.4. What can be done to improve health equity for the groups of people you have identified?

Using a proportionate universalism resource allocation approach in calculating CTS award, the level of excess income will identify which households need the most financial support.

We will ensure a One Coventry approach by working with our partners to ensure information and support is available for those groups facing the biggest health inequalities and to support households to engage in the public consultation.

The Benefits Service will actively identify households:

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- in which members are entitled to Free School Meals and will auto-enrol eligible households where possible
- who are not maximising welfare support

The Council tax department will aim to put in place individual council tax payment plans for any household who contacts early to explain they are experiencing payment difficulties.

Any information which identifies those groups disproportionately impacted by the CTS change who are known to face health inequalities, will be used to inform decisions as part of ongoing service development.

SECTION 4 - DIGITAL EXCLUSION INEQUALITIES

Please consider the digital exclusion information in the supporting document prior to completing this section.

4.1 Starting point:

Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate them? No

- Does your work assume service users have digital access and skills?
No, CTS processes remain the same as they currently are.
- Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access?
Yes. Low household income is an indicator for digital exclusion. Reduced Council Tax Support for low-income households may impact digital access, as this might make connectivity unaffordable. In addition to this, as digital access enables better opportunities across housing, employment and education, these can also be consequently impacted.
- Consider what the unintended consequences of your work might be.
The CTS processes remain the same as they currently are.



4.2 Reducing digital exclusion inequalities

Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?

Communication about the proposed changes will be made by post. There will be the option to complete a survey and to request this in paper format.

The proposed changes are to the levels of financial support, which could impact finances available for digital connectivity. By collaborating with our partners, these households could be supported through the National Databank.

Revenues and Benefits teams have been briefed to enable them to provide customers with information about the National Databank and will continue to review awareness processes regarding this.

The process for making a Council Tax Support claim and contacting the Benefits Service remain the same. This includes application forms that are online. However, customers who cannot access this continue to have the option to ring the Benefits Customer Services team, who will help complete an application form over the telephone. Customers can still report change in circumstances through email, telephone, online or through the post.

If the award of Council Tax Support changes, customers will continue to be sent a notification letter through the post. They will also receive a revised council tax bill through their usual method, which if they have not opted for electronic means, will be a paper-based bill through the post.

5.0 Will there be any potential impacts on Council staff from protected groups?

There will be no impact on job numbers and no restructure planned as an outcome of these proposals.

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



Only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

6.0 How will you monitor and evaluate the effect of this work?

- Monitor groups requesting council tax hardship support.
- Operate a dedicated section 13a 1 c (hardship fund) policy to support those in the greatest need.
- Capture and analyse data through the Council's complaints process.
- All officers across Revenues and Benefits will flag any complaints regarding the impact of the CTS changes/ability to pay the increased council tax amounts.

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



- Monitor groups affected by increased council tax and council tax arrears.
- Review the council tax recovery process for those in receipt of CTS.

6.1		
Issue Identified	Planned Action	Timeframe
Capture complaints about the impact of CTS changes	Capture and analyse data through the council's complaints process.	Incorporated into Business as Usual processes.
Ensure households on low income and those disproportionately impacted by inequalities are supported.	Continue to operate a dedicated section 13a 1 c (hardship fund) policy to support those in the greatest need.	Incorporated into Business as Usual processes.
Increase uptake of support available	Continue to work collaboratively with partners to ensure the most vulnerable households are maximising the support available to them.	31/03/2026
Ensure recovery action and additional costs are minimised	Review the council tax recovery process for those in receipt of CTS.	31/03/2026
Ensure households receive the best service and are aware of additional help	Provide training to Revenues, Benefits and Customer Services on changes, to include signposting to other support available.	31/03/2026
Ensure the impact of changes to the scheme are identified and reviewed for 2026/27	Monitor and review the impact of the changes to the scheme for 2025/26 and diarise to review CTS for 2026/27.	30/06/2026

7.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups

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- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

8.0 Approval

Signed: Head of Service: Barry Strain	Date: 20 November 2024
Name of Director: Barrie Hastie	Date sent to Director: 20 November 2024
Name of Lead Elected Member: Cllr R Brown	Date sent to Councillor: 20 November 2024

Email completed EIA to equality@coventry.gov.uk