

## COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		Council Tax Support Scheme 2026/2027
EIA Author	Name	L Sharma
	Position	Benefits Subsidy and Policy Lead
	Date of completion	February 2026
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 &amp; 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?

The Council Tax Support (CTS) scheme for working age households is a means-tested discount that helps households on low incomes pay their council tax bill. The level of support given depends on the income and household circumstances that may affect how much a household can pay.

The changes, which are the implementation of Council Tax Support on two homes, take effect from 1 April 2026.

The customer will not need to claim this additional temporary support through a separate channel, as eligibility will be checked and any further information requested, if necessary, when the customer notifies the Benefits Service of a change relating to one of the circumstances that qualifies for support for two homes.

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.

**Council Tax Support temporarily for two homes**

The change is to give temporary additional support where a resident is made liable for council tax for two homes if:

- They have left their original home through fear of violence, or
- Changes for disabled people are being made in their new home, like a wet bathroom or stairlift, or
- They have moved within the last four weeks and have an unavoidable liability to pay council tax for both their original home and new home

This means that where a person is liable for council tax at their original home, at the same time as being liable at their new home, in the above circumstances they can claim CTS at both addresses for a temporary period, appropriate to the situation.

**Impact:**

The provision of temporary additional support is intended to reduce the likelihood of individuals falling into council tax arrears on one or both properties. Eligible residents are less likely to miss out due to limited awareness because eligibility will be checked and any further information requested, if necessary, when the customer notifies the Benefits Service of a change relating to one of the circumstances that qualifies for support for two homes.

The impact on the CTS expenditure would not be an unmanageable cost as the numbers involved are small, approximately less than 100 people per year, based on modelling from a previous year's data.

**Public Engagement**

Coventry City Council undertook a public consultation on the changes to the Council Tax Support scheme. The results were used to inform decisions about the model.

A variety of methods were used to ensure the consultation was accessible to all Coventry residents. Methods included:

- information through a Let's Talk page on the Council's website
- phone support, if requested
- information in an alternative language, if requested
- feedback through a short survey

This is not an exhaustive list.

**1.3 List 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

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- Advice agencies and third sector organisations
- Social landlords
- Precepting authorities
- Policy in Practice
- Airey Consultancy Service Ltd

### 1.4 Who will be responsible for implementing the findings of this EIA?

B Strain, Head of Revenues and Benefits

## 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

Data Sources to consider are:

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups
- National and local statistics –
  - National guidance or legislative requirements
  - Census data
  - Audit information
  - JSNA
  - Public health profiles
  - LG inform
  - Census
  - Office for National Statistics
  - Facts about Coventry
  - Breakdown of Coventry by Protected Characteristic
  - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

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### 2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

In Coventry, Council Tax Support is currently awarded to approximately 16,000 working age households (aged 18 to 65).

Of this, approximately:

18% of customers have identified as being disabled.

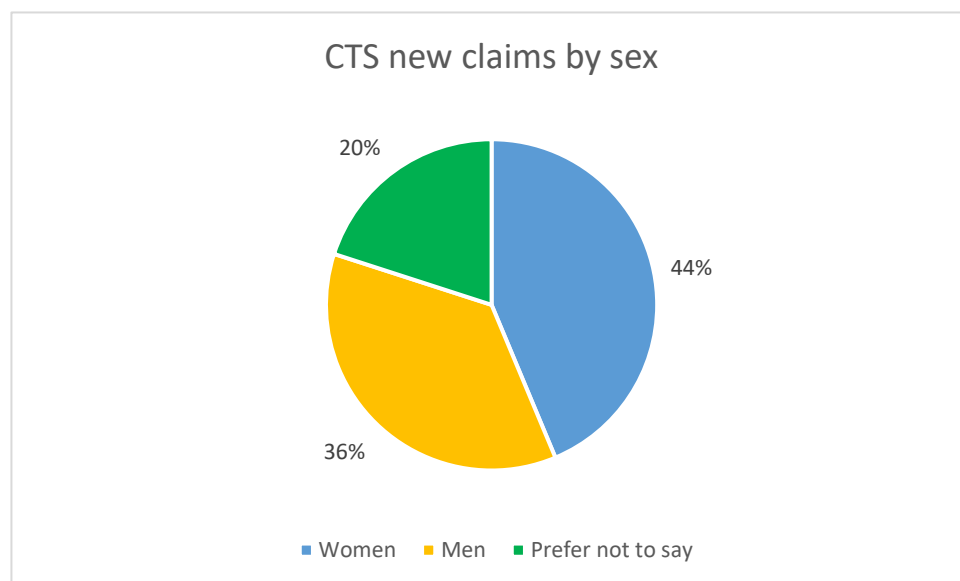
44% of customers are women and 36% are men.

Over 2/3<sup>rd</sup> of CTS new claims, are received from working age people

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

- Marriage and Civil Partnership
- Pregnancy or maternity
- Religion and Belief
- Sexual orientation

#### CTS new claims by sex



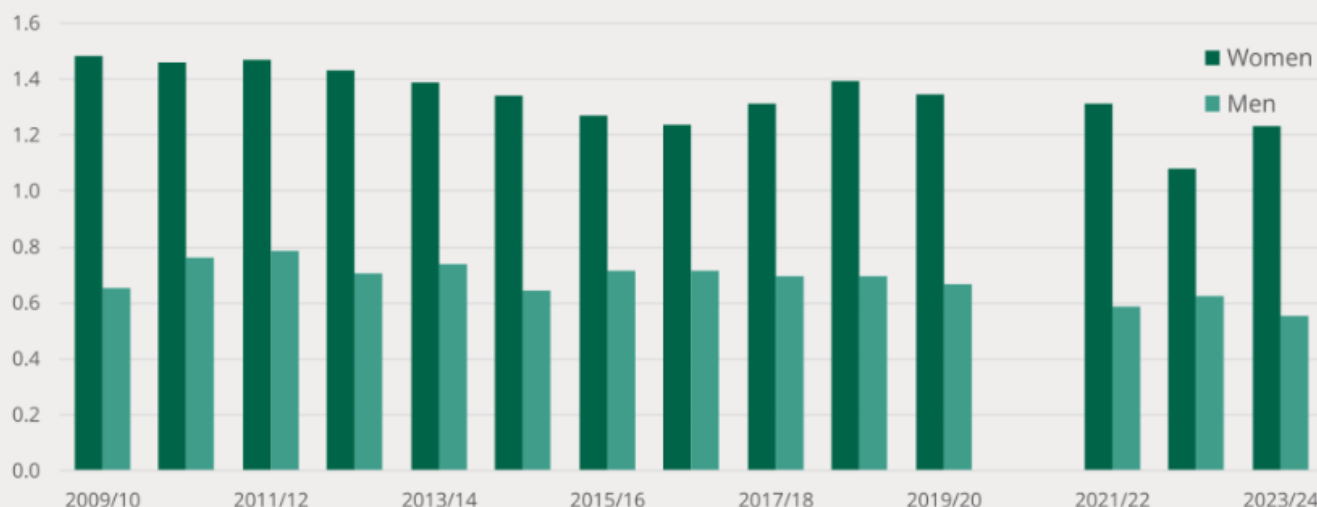
The change would positively impact both women and men because they can temporarily be awarded Council Tax Support on two homes, if they meet any of the qualifying criteria.

Although, in respect of CTS on two homes for people who have left their original home through fear of violence, this is more prevalent among women. For example, a government report published this year, focussed on violence against women and girls in 2025. It shows that in the year ending March 2024, over 1.2 million women and over 550,000 men between the ages of 16 and 59 are estimated to have been victims of domestic abuse.

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## Estimated number of domestic abuse victims between the ages of 16 and 59

England and Wales, millions



Source: UK Parliament Insight, 27 May 2025, Violence against women and girls in 2025.

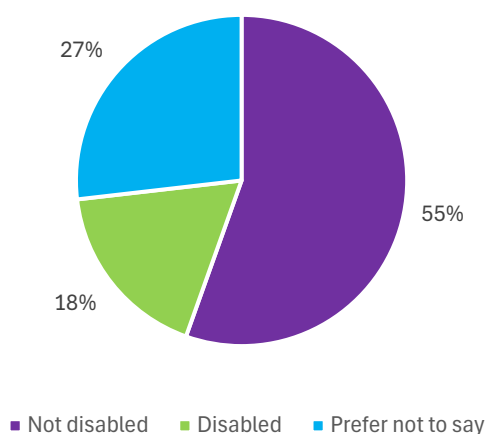
Available at: <https://commonslibrary.parliament.uk/violence-against-women-and-girls-in-2025/>

(Accessed: 1 December 2025)

Therefore, women are more likely to be positively impacted by this change, but it does not preclude men from being positively impacted too, if they meet the qualifying criteria.

### CTS new claims by disability

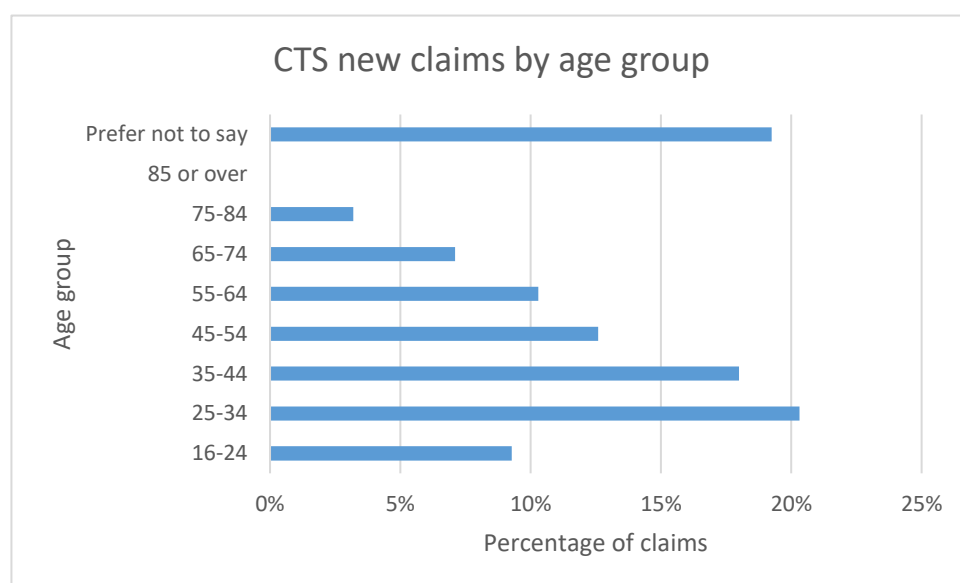
#### CTS new claims by disability



18% of new Council Tax Support claims are received from people who identify as being disabled. The change would positively impact a disabled customer because they can temporarily be awarded Council Tax Support on two homes, if they meet the qualifying criteria.

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### CTS new claims by age



Over 2/3<sup>rd</sup> of new Council Tax Support claims, are received from working age people. The change would positively impact a working age person because they can temporarily be awarded Council Tax Support on two homes, if they meet the qualifying criteria, such as for unavoidable liability.

### 2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. Pursue environmental sustainability and health equity

## SECTION 3 – Protected Groups and Additional Groups

### 3.1 Based on section 2, 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)

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Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-17	NI	There is no direct impact for this group.  CTS households have dependant members in this age group. There would be an indirect positive impact for this group if their parent meets the qualifying criteria.
Age 18-65	P	Working age CTS customers are typically aged between 18 and 65, so this group will be positively impacted by the changes, if they meet the qualifying criteria.  Otherwise, there will be no impact for this group.
Age 66 and over	NI	Pension age customers are currently 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 change to the CTS scheme.
Disability	P	This group will be positively impacted by the changes, if they meet the qualifying criteria.  Otherwise, there will be no impact for this group.
Gender reassignment	NI	The changes are not based on this protected characteristic, so there is no direct impact for this group.  However, there would be an indirect positive impact if they meet the qualifying criteria.
Marriage and Civil Partnership	NI	The changes are not based on this protected characteristic, so there is no direct impact for this group.  However, there would be an indirect positive impact if they meet the qualifying criteria.
Pregnancy and maternity	NI	The changes are not based on this protected characteristic, so there is no direct impact for this group.  However, there would be an indirect positive impact if they meet the qualifying criteria.
Race (Including: colour, nationality,	NI	The changes are not based on this protected characteristic, so there is no direct impact for this group.

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citizenship ethnic or national origins)		However, there would be an indirect positive impact if they meet the qualifying criteria.
Religion and belief	<b>NI</b>	<p>The changes are not based on this protected characteristic, so there is no direct impact for this group.</p> <p>However, there would be an indirect positive impact if they meet the qualifying criteria.</p>
Sex	<b>P</b>	<p>Research evidence regarding sex and poverty, indicates women are more likely to be living in financial hardship than men. This is supported by receipt of more new CTS claims from women than men.</p> <p>People who leave their original home through fear of violence are more likely to be women and there is dedicated support through specific support centres, such as Women's Refuge.</p> <p>Therefore, women are more likely to be positively impacted by this change, but it does not preclude men from being positively impacted too by the changes, if they meet the qualifying criteria.</p> <p>Otherwise, there will be no impact for this group.</p>
Sexual orientation	<b>NI</b>	<p>The changes are not based on this protected characteristic, so there is no direct impact for this group.</p> <p>However, there would be an indirect positive impact if they meet the qualifying criteria.</p>

**3.2 Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.**

Group	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Care Experienced	<b>NI</b>	<p>The changes are not based on this protected characteristic, so there is no direct impact for this group.</p> <p>However, there would be an indirect positive impact if they meet the qualifying criteria.</p>
Armed Forces	<b>NI</b>	<p>The changes are not based on this protected characteristic, so there is no direct impact for this group.</p> <p>However, there would be an indirect positive impact if they meet the qualifying criteria.</p>



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Social Economic Groups	P	<p>Data for vulnerability, low income, mental health is not routinely collected for CTS purposes. However, this group will be positively impacted by the changes, if they meet the qualifying criteria. By awarding CTS on two homes, this will mean the customer is less likely to experience financial disadvantage from being liable for council tax at two properties at the same time.</p> <p>The customer will not need to claim this additional temporary support through a separate channel, as eligibility will be checked and any further information requested, if necessary, when the customer notifies the Benefits Service of a change relating to one of the circumstances that qualifies for support for two homes.</p> <p>Otherwise, there will be no impact for this group.</p>
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## SECTION 4 – Next steps

Planned Action	Owner	Timescale
System testing to ensure possible to awards through CTS	A Maudlin	February 2026
User notes for system processing	R Hartopp	March 2026

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

- Monitor groups requesting council tax section 13a 1 c (hardship fund) policy.
- Historically, the two homes awards could only be processed through hardship support to support those in the greatest need. But with implementation through CTS awards, these requests will no longer need to be processed through section 13a 1 c (hardship fund) policy. Therefore, the request will be monitored as there should no longer be section 13a 1 c (hardship fund) policy requests for the purpose of two homes.
- Monitor CTS on two homes awards
- Run reports through system processing to ensure these claims are being awarded as expected.

## SECTION 5 – Impact on Council Staff

## 5.1 Will this area of work potentially have an impact on Council staff? No

If yes

Nature of impact and any mitigation required

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

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### 5.2 Please provide headcounts for the below.

If you think by completing this section's headcounts, employees will become identifiable please email [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk) for advice on data protection implications

#### Impact on Council staff - Sex

Female

Male

#### Impact on Council staff - Disability

Disabled

Not disabled

Prefer not to state

Unknown

#### Impact on Council staff - Ethnicity

White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

#### Impact on Council staff – Sexual orientation

Heterosexual

LGBT+

Prefer not to state

Unknown

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**Impact on Council staff – Age**

16-24

25-34

35-44

45-54

55-64

65+

**Impact on Council staff – Religion**

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state

Unknown

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## SECTION 6 – 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 ☒
- 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 ☐

Before you submit this form - please save your progress and forward the email you receive with any questions to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk). The team will review your Equality Impact Assessment and provide you with feedback.

## SECTION 7 - Approval

<b>Name of Head of Service:</b> B Strain	<b>Date approved by Head of Service:</b> 04/02/2026
<b>Name of Director:</b> B Hastie	<b>Date sent to Director:</b> 04/02/2026