City of Stoke-on-Trent

Equality Impact Assessment (EIA) Form

The purpose of this form is to ensure that the Council's equality duty can be shown to have been properly considered in the decision-making process. An EIA should be completed and attached to any reports or proposals put forward for decision by the Council. Please read the Council's Equality Impact Assessment Guidance before beginning the process.

Name of proposal being assessed	
Changes to the Local Council Tax Support Scheme for 2027/28	
Directorate/Service Area	**Date EIA Completed**
Resources	**7/10/26**
Lead Officer for this EIA	**Contact Number**
Kaye Holmes	**4321**

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Section 1 – Aims and objectives

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1. Background / Context

Local Council Tax Support (LCTS) came into effect in April 2013 as a replacement for Council Tax Benefit and under the system of LCTS all billing authorities responsible for collecting council tax were placed under a statutory duty to design and agree their own LCTS scheme.

Councils have discretion over the design of the working age LCTS scheme, and the level of financial support made available to residents.

We are proposing that for 2027/28 we implement an income banded LCTS scheme that would see the income of a claimant/partner placed into a band that would then determine how much LCTS they receive.

Please note - pensioners are not impacted by the proposed changes to implement an income banded scheme as they are assessed under the prescribed government regulations.

We do also propose to implement a provision for working age people and pensioners that would offer support to residents who have a terminal illness. This is separate to the overall proposals for the working age scheme as this would also be support offered to pensioners.

The relevant band would be determined based on household make-up and income. The income of anyone other than the claimant/partner would not be taken into account in the banding assessment. However, if there are other adults living in the property there may be a deduction made from the actual Council Tax Reduction entitlement depending on the income of the other adults. This deduction would be £0 or £10 per week depending on the income of the other adults. The criteria for a deduction to be made for other adults is the same as the current Council Tax Support scheme.

The LA currently have 4 Council Tax Support schemes – protected, working age other, working age employed and pensioners

Those residents in the current protected group can receive up to 100% of their LCTS paid, whereas those in the working age groups can only receive up to 70%.

The banded scheme proposal removes all the 3 current working age schemes – these being the vulnerable scheme (protected scheme), working age other scheme and working age employed scheme. They would be replaced with one banded working age scheme that sees everyone assessed on their assessable household income.

Certain benefits would be disregarded as income in the calculations of entitlement (listed below), and an additional disregarded applied depending on the income. Should a customer have been previously entitled to the disability premium, severe disability premium, or the enhanced disability premium based on their income, then a £50 per week disregard will be applied to their income calculation.

There are 6 potential changes that the Council intends to consult on:

- Implementing a banded scheme whereby a household is placed in a band based on their household income and this band determines the level of Council Tax reduction
- No longer having any protected groups (aside from pension age households)
- Disregarding certain incomes from the assessment

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- Awarding a £50 per week income disregard per household if you/your partner would be entitled to the disability premium, severe disability premium, or enhanced disability premium (these are explained in the consultation document on our web page)
- Limiting the number of children that can be considered when assessing entitlement to a maximum of 2 children – a child being someone who you receive child benefit for
- Supporting residents who have a terminal illness (this will also apply to pensioners)

Our proposed income bands are:

	SINGLE		SINGLE + 1 child		SINGLE +2 or more children		COUPLE		FAMILY+ 1 child		FAMILY +2 or more children	
	Income from	Income to	Income from	Income to	Income from	Income to	Income from	Income to	Income from	Income to	Income from	Income to
100%	£0.00	£90.00	£0.00	£160.00	£0.00	£230.00	£0.00	£135.00	£0.00	£205.00	£0.00	£279.00
85%	£90.01	£107.00	£160.01	£190.00	£230.01	£275.00	£135.01	£161.00	£205.01	£245.00	£279.01	£329.00
75%	£107.01	£157.00	£191.01	£241.00	£275.01	£325.00	£161.01	£211.00	£245.01	£295.00	£329.01	£379.00
50%	£157.01	£207.00	£241.01	£291.00	£325.01	£375.00	£211.01	£261.00	£295.01	£345.00	£379.01	£429.00
25%	£207.01	£257.00	£291.01	£341.00	£375.01	£425.00	£261.01	£311.00	£345.01	£395.00	£429.01	£479.00
0%	£257.01	and above	£341.00	and above	£425.01	and above	£311.01	and above	£395.01	and above	£479.01	and above

Income that would not be included in the assessment:

- Personal Independence Payment – all types
- Disability Living Allowance – all types
- War pensions – all types
- Attendance Allowance
- Child Benefit
- Maintenance

The following would be disregarded from UC income:

- Housing Costs
- Childcare costs (up to £175 per week for one child, or 300 per week for 2 or more children)
- Disabled child element
- Carer element

All other income would be included in the assessable income calculation.

The Council Tax Discretionary Relief Scheme would remain available to residents should the proposed changes be implemented and then changes to their Council Tax Reduction award mean they suffer financial hardship.

All working age claimants will be written to via letter or e-mail advising of the proposals and directing them to the consultation documents. The letter will be generic to prevent any data breach issues.

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2. Who will be affected?

This proposal has the potential to affect all working-age claimants that will be in receipt of LCTS in March 2027 as they may see their entitlement reduce from April 2027 - some may see their entitlement increase too however. A banded income scheme makes the calculation for Council Tax Reduction entitlement simpler to understand, therefore there is potential that we may see more people claiming Council Tax reduction as they can calculate themselves if they would be entitled to some support.

Pensioners are protected from any changes as they are assessed using a prescribed scheme set by Government.
However, the proposal to award support for residents with a terminal illness would be applied to working age customers and pensioners.

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Section 2 – Analysis of Impact

The EIA must get to evaluate fully and properly the actual and potential impacts, both negative and positive and any barriers. Please explain the likely differential impact on each of the 9 equality strands as well as the additional three characteristics that Stoke-on-Trent City Council consider during decision making processes, whether positive or negative. Where it is anticipated there will be no impact or a neutral impact from the proposal, please outline the evidence that supports this conclusion.

3. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?				
	Negative Impact	**Positive Impact**	**Neutral Impact**	**Reason(s)**
Age	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted are likely to have higher assessable income placing them in an income band to reflect that level of income. Some residents may have larger	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted are likely to have lower assessable income placing them in an income band to reflect that level of income. The support for residents with a	Some working age customers with this protected characteristic will not be affected by the proposals.	There are approximately 13000 working age households currently receiving Council Tax Support in the Stoke-on-Trent area. Only working age households will have the potential to be affected by the proposed scheme changes. In addition to the working age customers, we have 9000 pensioner households that could also be supported through the proposals to support the terminally ill. Looking specifically at the impacts of limiting the number of children to

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	families with more than two children and they may also see their entitlement affected as their assessable income will result in being in lower percentage band, or lose entitlement altogether. This may also negatively impact the children themselves.	terminal illness will benefit any resident that meets the criteria and will see them awarded full council tax support to alleviate some financial burden during a difficult time.		2, when assessing a claim and using the same sample, it is noted that 1177 (or 11%) of the sample have 3 or more dependent children. Of these 508, 43% will receive reduced support, and 57% will receive increased support or see no change to their LCTS entitlement. As there may be some significant changes in entitlement for some residents, support may be offered via the Council Tax Discretionary Relief Scheme if this is applied for. Signposting to other relevant support services would also be provided.
Disability	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have	Some working age customers with this protected characteristic may not be affected by the proposals. All disability benefits are being disregarded in the calculation and therefore not included as	Disability benefits will not be included as part of a household's assessable income. All types of Personal Independence Payments, Disability Living Allowance, Attendance Allowance will be disregarded from the household income assessment. Alongside this, residents who would be entitled to the disability premium, severe disability premium, or enhanced disability premium would

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	higher assessable income placing them in an income band to reflect that level of income. All disability benefits are being disregarded in the calculation and therefore not included as assessable income and have no impact in the income band they are placed in.	lower assessable income placing them in an income band to reflect that level of income. All disability benefits are being disregarded in the calculation and therefore not included as assessable income and have no impact in the income band they are placed in. The support for residents with a terminal illness will benefit any resident that meets the criteria and will see them awarded full council tax support to alleviate some financial burden during a difficult time.	assessable income and have no impact in the income band they are placed in.	also have a £50 per week disregard applied to their assessment to take into account the potential additional expense their disability may mean. Those with reduced support may apply to the Council Tax Discretionary Relief Scheme, which will operate to mitigate some of these impacts.

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Marriage/Civil Partnership	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	Some working age customers with this protected characteristic may not be affected by the proposals.	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 marital status.** The banded scheme is based on residents being single or a couple and any resident children - their marital status is irrelevant to the assessment. Those with reduced support may apply to the Discretionary Council Tax Discretionary Relief Scheme, which will operate to mitigate some of these impacts
Gender Reassignment	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme	Some working age customers with this protected characteristic may not be affected by the proposals.	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 gender reassignment. The banded scheme is based on residents being single or a couple and any resident children and their gender is irrelevant to the assessment.

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	proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.		Those with reduced support may apply to the Discretionary Council Tax Discretionary Relief Scheme, which will operate to mitigate some of these impacts
Pregnancy and Maternity	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	Some working age customers with this protected characteristic may not be affected by the proposals.	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 pregnancy or maternity status.** The banded scheme is based on residents being single or a couple and any resident children and their pregnancy/maternity is irrelevant to the assessment. Some impacts may be positive because those with reduced incomes based on statutory maternity pay may receive more support.

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Race	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income. The proposed changes may have a disproportionate impact on some ethnic groups where larger household sizes are more common. As entitlement to Council Tax Support can be influenced by household composition and	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	Some working age customers with this protected characteristic may not be affected by the proposals.	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.** Some claimants with this protected characteristic may be harder to engage with and make them aware of this change if their main language is not English. For any residents impacted by the changes, the Council Tax Discretionary Relief fund is available for additional support

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	financial circumstances, these households may be more affected by any reduction in support.			
Religion or Belief	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	Some working age customers with this protected characteristic may not be affected by the proposals.	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 religion or beliefs.** The banded scheme is based on residents being single or a couple and any resident children - their religion/beliefs are irrelevant to the assessment.

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Sex	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income. Based on current modelling figures, 59% of female claimants and 70% of male claimants would receive less Council Tax reduction entitlement than they do under the current scheme	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income. Approximately 32% of female claimants and 23% of male claimants would receive a higher LCTS entitlement	Some working age customers with this protected characteristic may not be affected by the proposals. Some have no impact on their LCTS entitlement – this is the case for approx. 9% of female claimants and 7% of male claimants.	Some will see an increase in their LCTS award, some a decrease and some will stay the same Modelling carried out on a sample of 10465 working age claims shows 62% of CTS lead claimants are female and 38% male. Overall, 28% of claimants will see an increase in entitlement of an average of £5.43 per week, 63% will see a decrease in entitlement of an average of £9.57 per week, 9% will see not change in their entitlement* *this is based on latest modelling figure and is subject to change As noted, those with reduced support may apply to the Discretionary Council Tax Relief Scheme, which will operate to mitigate some of these impacts.

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Sexual Orientation	Any working age customers with this protected characteristic could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	Any working age customers with this protected characteristic could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	Some working age customers with this protected characteristic may not be affected by the proposals.	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 sexual orientation**. The banded scheme is based on residents being single or a couple and any resident children - their sexual orientation is irrelevant to the assessment.
Care Leavers	No negative impact	No positive impact	There will be a neutral impact due to the way we support care leavers	Due to the way we support care leavers they will see no change in the support they receive. Whilst they may see an increase or decrease in the amount of council tax support they receive, in every case we apply an exemption to any balance due so the care leaver has nothing to pay

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Veterans / Reservists	Any working age customers that are veterans/reservists could be affected by the proposals and they may receive less CTR as a result. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income. All war/armed forces invalidity pensions will continue to be disregarded in full as income under the proposed scheme	Any working age customers that are veterans/reservists could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income. All war/armed forces invalidity pensions will continue to be disregarded in full as income under the proposed scheme	Some working age customers with this that are veterans/reservists may not be affected by the proposals. All war/armed forces invalidity pensions will continue to be disregarded in full as income under the proposed scheme	All war pensions/armed forces invalidity pensions will continue to be disregarded under the proposed scheme therefore it would only be the other income the person received that would determine the level of support .
Economically Deprived	Any working age customers that are considered	Any working age customers that are considered	Some working age customers that are considered	The banded scheme is designed to give more support to those on the lowest incomes. Under the current scheme some of the claimants with

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	economically deprived could be affected by the proposals and they may receive less CTR as a result. However, the bands have been designed to provide the most support to those on the lowest incomes. Those impacted by the banded scheme proposals are likely to have higher assessable income placing them in an income band to reflect that level of income.	economically deprived could be affected by the proposals and they may receive more CTR as a result. Those impacted by the banded scheme proposals are more likely to have lower assessable income placing them in an income band to reflect that level of income.	economically deprived may not be affected by the proposals.	the lowest incomes still have to pay 30% of their council tax liability, under the proposed scheme they could receive anything up to 100%. Claimants who need additional support will be signposted to other agencies for support with budgeting. Those with reduced support may apply to the Council Tax Discretionary Relief Scheme, which will operate to mitigate some of these impacts

4. Are there any other groups (e.g. travellers, single parents, those on low income etc) who may be disadvantaged by the proposal's operation, or who may not benefit equally from it?
The proposal for a banded scheme may or may not impact all working age people regardless of any protected characteristic or any other group they may belong to. The banded scheme takes account of household income and household make up to ascertain the council take support entitlement. The scheme is set up within our processing system and the decision on entitlement is then based on information provided by the customers and/or DWP.

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Section 3 – Evidence and Engagement

5. What evidence and sources have you used?
This could include consultations, surveys, meetings, monitoring data and other evidence

We intend to launch a public consultation for 6 weeks then the responses will be collated and a then a decision made if we will continue with the proposals.

Around 45% Local Authorities currently operate an income banded LCTS scheme.

We have designed our income bands based by reviewing other LA's schemes and taking into account a potential increase in benefit amounts from April 2027.

Modelling of the scheme and the potential impacts has been done using our benefits processing system (NEC) modelling tool and through updating our test processing database with the proposal. Figures given are based on latest modelling outcomes and are subject to change as the caseload changes.

There has been a LCTS working group meeting regularly to discuss the proposals.

With the proposed changes, we intend to make the scheme easier to administer, simpler for residents to understand and fairer to all.

6. If you have not been able to use reliable monitoring data, please describe what process(es) you have used to assess the potential equalities impact(s) of your proposal.

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Section 4 – Outcome of the Assessment

The purpose of the EIA is to consider the implications and the likely impact on people with these protected characteristics, minimising any negative impacts.

Please tick what the overall outcome of the assessment was and follow the next steps.

The EIA did not identify any significant concerns OR the concerns have already been addressed	X	Proceed with the implementation
The EIA identified SOME negative impacts that need addressing		Complete an action plan setting out adjustments that will address any negative impacts
The EIA identified MAJOR concerns and would be unable to reduce or remove the negative impacts		Stop and revise the activity thoroughly

Section 5 – Action Plan

Action to be undertaken	Leader Officer and/or Lead Strategic Group	Timescale
Finalise all consultation documents/web page	Sarah Deane	Prior to consultation beginning
Writing to all working age residents that are currently claiming to advise of the proposed changes	Sarah Deane	Prior to consultation beginning
Dedicated phone line and e-mail address to be provided on all documentation for consultation	Sarah Deane	Prior to consultation beginning
Contact departments within the LA and external providers of support to residents	Sarah Deane	Prior to consultation beginning
If the new Scheme results in a saving, the Discretionary Relief Fund will be increased to reflect the extent of the saving	Sarah Deane	Depends on outcome of any scheme change

Signed (lead officer): ----- ----------

Signed (lead manager): ---- ----------

Date: ----8/10/26----------

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If your EIA is for any decision that is published on the Council's website, you will need to ensure the EIA accompanies it. If your EIA is for a project that is not published, such as a restructure or an internal policy, please ensure that you keep a copy on record with a date of when the decision was published. For any additional support please contact equality@stoke.gov.uk

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