



Committee report

Committee	FULL COUNCIL
Date	20 JANUARY 2016
Title	LOCAL COUNCIL TAX SUPPORT SCHEME 2016/17
Report of	THE LEADER AND EXECUTIVE MEMBER FOR RESOURCES AND CHILDREN'S SERVICES

EXECUTIVE SUMMARY

1. This report sets out the outcome of the public consultation exercise undertaken in respect of the council's local council tax support scheme. Taking the outcome of the consultation into account as well as the financial pressures which the council faces, the report proposes a number of changes to the existing scheme to be implemented for 2016/17. Full Council members must review all documentation attached with this report to have due regard to the changes and implications before making a decision.
2. Prior to 1 April 2013 support to council tax payers on low incomes was provided by a national council tax benefit scheme that was fully funded by the government. The government in transferring the responsibility to individual councils, initially cut the funding by ten per cent and subsequently through the revenue support grant arrangements has massively reduced the funding given. This has meant that the financial burden increasingly falls on local councils at the same time as other funding they receive is being significantly reduced.
3. The Provisional Local Government Finance Settlement announced on 17 December 2015 set out the council's revenue support grant figures, which show a 30.7 per cent reduction in 2016/17. This means that on a pro rata basis that the grant included for local council tax support is reduced by a further £2.534 million from 2015/16. Against this, the proposed changes in the report to the local council tax support scheme are estimated to deliver savings in support given of £632,000.
4. Because of the way that the government has passed responsibility to councils for local council tax support and then substantially reduced the funding it gives for such support, the council is placed in a very difficult position in that a scheme to offer the protection to low income households that is needed, is not affordable and therefore the council is forced to make decisions on a scheme that they would otherwise not make.

5. In trying to balance the need against affordability, the report sets out a recommended scheme for 2016/17 which incorporates proposed changes from the existing scheme that are largely consistent with the consultation, and deliver savings but still offer substantial support to those that need it. In particular:
- to retain a Council Tax Support (CTS) reduction scheme for working age council tax payers;
 - not to lower the maximum eligibility for working age claimants and preserve this at 80 per cent of council tax liability;
 - removing the blanket protection for working age claimants and replacing with a targeted protection (Exceptional Hardship Fund) - this will take into account individual circumstances, including the claimants income and essential outgoings to recognise genuine vulnerability and additional assistance need;
 - continue to preserve certain enhancements to disabled claimants, partners and dependent children through the continued granting of additional disability premiums and the disregard of disability living allowances and personal independence payments as income;
 - not counting child benefit as income for families with children;
 - not capping CTS to a specific council tax band.

OUTCOME

6. To agree a Local Council Tax Support Scheme for 2016/17.

BACKGROUND

7. The National Council Tax Benefit Scheme was abolished by the government on 31 March 2013. Under that scheme claimants on very low incomes could get 100 per cent of their council tax paid. The government paid a grant in respect of the benefit given that meant that there was no cost falling on the council.
8. In addition the council tax benefit paid counted as council tax income, with the benefit being credited to the claimants council tax account. Under the local schemes, any support given towards council tax bills is deducted from the council tax due to be paid thus reducing the council tax base.
9. In introducing the changes the government reduced the overall level of funding initially by some ten per cent but made no allowance for any future growth in numbers of claims or their value or for any council tax rises. It also protected pensioners by not allowing any reduction in their support.
10. Since 2013/14 the grant received from the government has continued to be reduced in real terms as it is part of the base level funding received by government that is being cut each year.
11. Under the new local schemes the reduced level of government grant is paid directly to major preceptors, in our case this means the Isle of Wight Council gets its own share, the police (the Hampshire police and crime commissioner) get their proportion of grant paid directly to them. For local preceptors (the

town and parish councils) the total proportion of grant related to them is paid to the Isle of Wight Council in one amount and this is then apportioned and passed on to individual town and parish councils.

12. In addition to the change to local council tax support schemes the government also made technical changes to council tax for discounts on second homes and exemptions and discounts on empty properties.

ISSUES TO CONSIDER IN AGREEING A FINAL LOCAL SCHEME

13. In deciding on a local scheme Full Council needs to consider:
- a) the outcomes from the public consultation exercise;
 - b) the overall financial impact of the scheme and its affordability;
 - c) the potential impact on claimants and their ability to pay more towards their council tax as a result of any reduction in support they receive;
 - d) the equality impact assessment.

(a) Public consultation

14. A full and comprehensive consultation exercise was undertaken from 7 September 2015 to 6 November 2015 as follows:

<u>Stakeholders</u>	<u>Methodology</u>
1. Existing claimants (both working age and pensionable age)	Individual postcards to promote the LCTS potential changes ‘this could affect you slogan.’ Online survey via questionnaire explaining proposals and likely impact. Paper survey if requested. Benefit notifications and letters issued to claimants had a notice on them to promote the survey.
2. Council taxpayers and service users generally	Council tax bills had notice on front of them to promote the consultation. Online survey via questionnaire explaining proposals and likely impact. Paper survey if requested.
3. Interested organisations and groups.	Anti-poverty group meeting 1/10/15. Email sent to Housing Benefit Working Group members to raise awareness and for them to circulate to their customers. Email to all parish and town council clerks to raise awareness and seek their response Letter sent to the police and crime commissioner seeking views.

General awareness	
Provision of information and awareness raising of changes and proposals	www.iwight.com Press releases. Face to face communication at customer service points. Information in libraries. The council's Facebook and Twitter sites (weekly promotions).

15. An analysis of the consultation responses is set out in Appendix 1 to this report. In overall terms there were 581 public responses to the survey including generalised written responses where the respondents didn't answer specific questions but provided comment. There were also additional comments to questions through the free text boxes (set out in full within Appendix 1a). The majority of survey respondents:

- agreed that the council should retain a council tax support scheme for working age claimants;
- disagreed with changing the minimum payment to either 25 per cent or 30 per cent and therefore retaining it at 20 per cent meaning the maximum CTS support continues to be 80 per cent of council tax liability;
- agreed to the removal of the Family Premium in line with housing benefit changes from May 2016;
- agreed to a reduction to backdating provisions for working age claimants from six months to one calendar month;
- disagreed with including Disability Living Allowance and Personal Independence Payments as income by removing the income disregards for these payments;
- disagreed with the inclusion of Child Benefit as income in the assessment thereby removing the income disregards for these payments;
- agreed to fully implement the minimum living wage (floor) for self-employed claimants after a start-up period of one year;
- agreed to a reduction to the capital (savings) limit to £6,000;
- agreed to limit the amount of CTS to a band C council tax level;
- agreed to the removal of the blanket protection given to claimants receiving certain benefits and introduce a targeted (Exceptional Hardship) protection scheme;
- disagreed with raising council tax levels;
- disagreed with finding savings from cutting other council services;
- agreed that the council should use its reserves rather than cutting the level of CTS support;
- agreed the council should increase income opportunities.

The full details of the consultation analysis are set out in appendices 1 and 1a.

(b) Overall financial impact of scheme and its affordability

16. The latest position on claimants and cost of support between the different categories is set out in the table below :-

	Average number of claimants 2013/14	Average number of claimants 2014/15	Average number of claimants 2015/16 To 30/11/15	Cost of support 2013/14	Cost of support 2014/15	Average cost of support 2015/16 To 30/11/15
Pensioners	6,907	6,614	6,294	£6,278k	£6100k	£5,864k
Working age vulnerable (blanket protection)	2,754	2,965	3,341	£2,579k	£2,874k	£3,269k
Other working age	4,943	4,410	3,582	£3,666k	£2,902k	£2,394,k
Council tax support	14,604	13,989	13,217	£12,523k	£11,876k	£11,527k

17. It can be seen from the above table that there is a continuing reduction in the number and cost of claims. Within this, however, there is an increasing number and cost of working age blanket protection claimants.
18. The projected outturn for 2015/16 is a cost of £11.6 million, which is the overall reduction in council tax as a result of the council tax support given. This relates not just to the council element of council tax but also to the police and town and parish council precepts. The grant related to the police precept is paid directly to them. The council and town and parish council element is paid to the council and the element related to town and parish councils is then passed onto the individual town and parish councils. The position on grant is set out in the table below:

	2013/14	2014/15	2015/16 est	2016/17
Council plus town and parish council share of CT Support grant included in start-up funding	£10.764m	£9.667m	£8.459m	£5.860m
Pro rata reduction applied to CT Support grant:				
Town and parish councils share	£0.259m	£0.233m	£0.204m	£0.140m
Isle of Wight Council	£10.505m	£9.434m	£8.254m	£5.720m
Council element of cost	£11.233m	£10.665m	£10.355m	£10.440m
Projected cost after grant *	£0.728m	£1.231m	£2.101m	£4.720m
*Excludes non-collection				

19. In considering how this shortfall should be met, consideration needs to be given to the overall financial position of the council as set out in the report

being considered at the same meeting of the Full Council as this paper on the comprehensive spending review and provisional Local Government Finance Settlement 2016/17.

20. Since 2012/13 the number of claimants and the cost of council tax support given has reduced. The biggest impact, however, is that the grant from the government has been absorbed in the start-up funding that the council gets as part of the Local Government Finance Settlement and this is being reduced significantly year on year. Since 2012/13 grant funding has been effectively cut by nearly £6 million (51 per cent).
21. Full Council on 25 November 2015 agreed that the relevant proportion of grant be passed on to town and parish councils.

(c) Impact on claimants of changes to elements of the scheme

22. A summary of the average impact on claimants of the proposed changes is set out in Appendix 3. In terms of the average weekly loss of support in both monetary values and the number of claimants potentially impacted by these options the table below provides a summary.

Options	No's impacted	Average weekly reduction of CTS based on current year c/tax liability
Removal of Family Premium (from May 2016)	395	£3.44
Backdating limited to one calendar month	149	£1.67
Minimum Living Wage (floor) for self employed	481	£13.62
Remove blanket protection for certain claimants (replaced by targeted support)	3,089	£3.80
Reduce capital limit from £16,000 to £6,000	95	£14.50
Limit CTS to maximum band C level	236	£4.78

23. While in terms of monetary loss the impact is potentially greater for those experiencing reductions due to capital limit changes and self-employed minimum living wage (floor), the number of claims are however lower. Whereas the monetary loss is less for the 'blanket protection' removal but the number of claimants impacted is higher.

24. There will also be an added impact of any council tax increase. On the basis that this was 3.99 per cent for the council, 1.99 per cent for the police precept and an overall five per cent for town and parish councils in 2016/17, the average council tax band D equivalent would increase from £1,547.40 to £1,606.48 and would have a slight impact on the average weekly reductions indicated in the table above (once CTS calculations had been factored in).
25. The blanket protection assumes that those working age claimants, their partners or dependent children that receive certain (disability) benefits should have a blanket protection to a maximum of 100 per cent of their council tax liability applied. The introduction of a targeted protection scheme (Exceptional Hardship Fund) rather than a blanket protection will take into account individual circumstances, including the claimant's income and essential outgoings. It is envisaged that a third of the total gross savings to be achieved from the removal of the blanket protection (£204, 000) will be made available to provide exceptional hardship awards.
26. Although there are 3,089 claimants impacted by the removal of the blanket protection the CTS scheme will continue to preserve certain enhancements to disabled claimants, partners and dependent children through the continued granting of additional disability premiums and the disregard of disability living allowances and personal independence payments as income within the CTS calculation.

(d) Equality impact assessment

27. The equality impact assessment has been updated following the consultation and this is set out in Appendix 2 to this report. The equality impact assessment is based on the proposed scheme for 2016/17 including the recommended changes.
28. The government has determined that under the new arrangements that there can be no reduction for council tax support to pensioners.
29. The overall profile of current council tax support claimants at 30 November 2015 was:
 - pensioners form 51 per cent in cost and 48 per cent in number of claims;
 - 25 per cent of total claimants (48 per cent of working age claimants) are working-age blanket protection – some 3,341 claims;
 - 61 per cent of working age claimants are pass-ported cases (on income support/ job seekers' allowances) where they have automatic entitlement to council tax support;
 - 82 per cent of working age claimants are also in receipt of Housing Benefit;
 - 52 per cent of working age claimants have dependents;
 - there are currently some 6,923 working age claimants;

- only nine per cent of working age claimants are 18 to 25 years of age, but 72 per cent of those claimants have dependant children;
 - 50 per cent of working age claimants are over 45.
30. Under the proposed scheme it would remove the blanket protection given to applicants with certain benefits and to replace it with a targeted (Exceptional Hardship) scheme that would require individual applications and take into account individual circumstances including the claimant's income and essential outgoings. All working age claimants will therefore have their CTS restricted to 80 per cent of the council tax liability unless they qualify for any exceptional hardship.
31. With regard to impact on those claimants, their partners or dependent children in receipt of the allowances below could face a reduction in CTS, as they will be treated the same as all other working age claims unless they qualify for exceptional hardship:
- Disability Living Allowance Care higher rate.
 - Disability Living Allowance Care middle rate.
 - Disability Living Allowance Care lower rate.
 - Disability Living Allowance mobility.
 - Attendance Allowance.
 - Employment Support Allowance (support component).
 - Severe Disabled Allowance.
 - War Widows' Pension / War Disablement Pensions/Armed Forces Compensation.
 - Incapacity Benefit (long term rate).
32. However, the scheme will continue to protect disabled through the continued granting of additional living allowances:
- Disability Premium.
 - Disabled Child Premium.
 - Enhanced Disability Premium.
 - Severe Disability Premium.
 - Dependents additions.
 - Disabled Child Premium.
33. With regard to impact on families with children under the proposed scheme child benefit will continue to be disregarded as income.
34. The one area where there may be a disproportionate impact on households, particularly with children, is on the proposal to restrict the eligibility to entitlement, before applying the 80 per cent limit, to the maximum of a band C council tax level.
35. Based on the caseload at 30 November 2015 there would only be some 236 properties in total affected. Included within this figure the majority (121) of the properties in the higher bands have two or less occupiers in them. However, out of the remaining 115 cases there are a number of families (84) with three or more children that would be significantly impacted by the band restriction.

The reduction in support for those claimants currently getting 80 per cent support by restricting to band C would impact the bandings above this level in the following way:

36. Those claimants who are in properties in the higher bands will still be subject to the 20 per cent limit of council tax liability which would mean a further reduction in council tax support of £169 per annum (£127 with single person discount) for a band D, £371 p.a. (£278 with single person discount) for a band E, £439 per annum (£329 with single person discount) for a band F, £506 per annum (£380 with single person discount) for a band G. There are no claimants currently in a band H.
37. The total amount estimated to be raised from limiting to band C £59,000 and actual collection is likely to be lower than this. It is therefore proposed that, despite the consultation indicating support for this that this element of the preferred scheme be not included in the final scheme.

PROPOSED FINAL SCHEME

38. Taking into account the updated financial position, the consultation, equality impacts and the conclusions set out above the proposed final scheme can be summarised as follows:

	Estimated gross financial Impact including preceptors
Reduction in support	
Removal of Family Premium (from May 2016)	-£71,000
Backdating limited to one calendar month	-£13,000
Minimum Living Wage (floor) for self employed	-£346,000
Remove blanket protection for certain claimants (replaced by targeted support)	-£614,000 +£204,000
Reduce capital limit from £16,000 to £6,000	<u>-£72,000</u>
<i>Total savings from reducing support (individual calculation totals)*</i>	<i>-£912,000</i>
Total savings through combining the options to achieve overall savings	-£878,000
Provision for non –collection at 20 per cent	<u>+£176,000</u>
Net Savings	-£702,000
Proportion relating to the police precept 10 per cent	<u>+£70,000</u>
Net saving to Isle of Wight Council	<u>-£632,000</u>

* Note this figure total is based on each individual calculated savings figures for each of the options being added together, however, when all the options are modelled in combination the total will differ to reflect the combined impact of the changes to provide a combined savings figure.

39. A summary of the average impact on claimants is set out in Appendix 3 to this report, the overall draft scheme in Appendix 4 and the Hardship Fund Policy in Appendix 4a.

COUNCIL TAX RECOVERY

40. The collection challenges have been substantially different from normal council tax debt and previous processes were therefore changed significantly. This has resulted in much more proactive collection methods, encouraging council taxpayers to contact us as early as possible to avoid recovery action. However, those cases that fail to engage and subsequently progress through the recovery cycle, require greater intervention to initiate a payment arrangement, attachment to earnings or attachment to benefit. It has always been the policy to attempt to avoid issuing cases to enforcement agents for collection until all other avenues of recovery have been exhausted to avoid additional costs being incurred by the council taxpayer and delaying receipt of payments of the actual debt.
41. The experience to date is there have been an increase of 81 per cent in attachment to earnings from 2013/14 to 2015/15 and a 10 per cent increase in attachment to benefits. There has also been a reduction in the number of cases issued to enforcement agents by 26 per cent. Overall 'in year' collection rates have not suffered to the extent which had been initially envisaged and currently for 2015/16 collection is at the same level as the 2014/15.
42. An assumption is that 80 per cent of the additional council tax will be collected in year from working age claimants impacted and the balance collected over subsequent years through the recovery methods mentioned above. In terms of in-year overall council tax collection this would therefore see only a slight reduction 0.25 per cent in collection rate meaning that the current in year collection would decrease from 97.6 per cent to 97.35 per cent in real terms.

FINANCIAL / BUDGET IMPLICATIONS

43. The provisional Local Government Finance Settlement announced on 17 December 2015 set out the council's revenue support grant position. This indicates that for 2016/17 the council will face a reduction in revenue support grant of 30.7 per cent or £8.021 million. On a pro rata basis this means an effective cut in the grant the council receives for local council tax support of £2.534 million in 2016/17. This report sets out a proposal for a local council tax support scheme that on estimated caseloads and costs would achieve savings of £632,000 to partially offset the reduction in grant.
44. In addition to the wider considerations in the report including the outcome of the consultation, the impact on claimants and the equality impact assessment the overall financial position of the council needs to be taken into account as set out in a separate report on the Full Council agenda.

45. The grant cuts from government are significant and it is not realistic to make up the extent of the cuts from reducing support further to bridge the gap. Any further reductions in support from that proposed in the report are likely to lead to the escalation of non-collection.

LEGAL IMPLICATIONS

46. The council will need to set a lawful and balanced budget and council tax level for 2016/17 at the Full Council meeting on 24 February 2016. The final decision on the local Council Tax Support Scheme needs to be made by the 31 January 2016 in advance of the budget setting meeting.
47. In finally deciding what form the local Council Tax Reduction Scheme should take, the council will need to take into account the equality impact assessment of the options, what mitigating actions can be taken to reduce the impact, the results of the consultation exercise and the wider budget position and the potential impact on council taxpayers and users of services.
48. There must be proper consideration of the impact of the proposals on relevant groups and Full Council members are required to have read the equality impact assessment to enable them to have due regard to the Public Sector Equality Duty before making a decision.

EQUALITY AND DIVERSITY

49. The council has to comply with Section 149 of the Equality Act 2010. This provides that decision makers must have due regard to the elimination of discrimination, victimisation and harassment, advancing equalities, and fostering good relations between different groups (race, disability, gender, age, sexual orientation, gender reassignment, religion/belief, pregnancy and maternity, and marriage/civil partnership). An equality impact assessment will be completed in respect of relevant proposals as part of the decision making process to enable members to take into account and if necessary mitigate the impacts as part of the decision making process.
50. The equality impact assessment for the proposed local Council Tax Support Scheme is attached at Appendix 2 to this report.

OPTIONS

51. There are four main options to consider:
 - A. To agree a local scheme that is the same as the existing scheme that is currently in place for 2015/16 and meet the net cost after grant estimated at £4.720 million in 2016/17, an increase of £2.619 million from the current year.
 - B. To implement a local scheme that matches the council tax support given with the grant received with no net cost falling on the council.

- C. To implement a local scheme that varies certain elements of the existing scheme as proposed in the report so that savings can be made thus reducing the net cost of the scheme to the council in 2016/17.
- D. To implement a local scheme that varies different elements of the existing scheme to those proposed in the report so that savings can be made thus reducing the net cost of the scheme to the council in 2016/17.

EVALUATION

- 52. The projected gap between the government grant and the estimated cost of council tax support if the current local council tax support scheme entitlements were left unchanged for 2016/17 is £4.720 million.
- 53. Option A in the context of the council's financial position and the provisional Local Government Finance Settlement is unaffordable
- 54. Option B would entail reducing existing support to by some 45 per cent. This would include working age blanket protection claimants and would have a significant impact on claimants and would be likely to result in high levels of non-collection and write-offs. This option is therefore not realistic and is not being recommended.
- 55. Option C is somewhere between option A and B. There are a number of different elements that could be changed but the thrust of this option is as follows:
 - (i) To retain a CTS reduction scheme for working age council tax payers that is deemed affordable.
 - (ii) Not to change the support of a maximum 80 per cent of council tax liability for working age claimants.
 - (iii) Not to support those claimants that are deemed to hold capital over a certain level.
 - (iv) Continue to give protection to families with children and working age vulnerable by still disregarding child benefit, war pensions and other related income categories.
 - (v) Continue the incentive for work by not increasing the taper by which additional income over the applicable is taken into account.
 - (vi) Remove the blanket protection given to applicants with certain benefits and to replace it with a targeted (Exceptional Hardship) scheme that would require individual applications and take into account individual circumstances including the claimant's income and essential outgoings. However, this option would continue to preserve certain enhancements to disabled claimants, partners and dependent children through the continued granting of additional disability premiums and the disregard of disability living allowances and personal independence payments as income.
 - (vii) Mirror some amendments to the Housing Benefit national scheme (Backdating and Family Premium).
 - (viii) Fully implement the minimum living wage (floor) for self-employed claimants after a start-up period of one year.

56. Option C is recommended as it gives significant protection to the most vulnerable, makes some savings on the existing scheme and maintains a number of elements the same as the existing scheme as supported by the outcomes of the consultation.
57. Option D is a variant of option C as some of the proposed changes could be rejected or alternatively other changes could be made. Based on the outcomes of the consultation and the impact of any changes on claimants it is felt that option C gives the best overall scheme.

RISK MANAGEMENT

58. The financial risks relate to the uncertainty of future growth in cases and eligibility and the potential impact on council tax collection rates. The projected level of support with estimated collection rates will be included within the council tax base calculations in determining the total of council tax income for 2016/17.

RECOMMENDATIONS

That Full Council considers:

1. the outcomes of the consultation process set out in this report and in Appendix 1 to this report;
2. the stage 2 equality impact assessments set out in Appendix 2 to this report; Full Council Members must review this to have due regard to the changes and implications before making a decision;
3. the options set out in the report and their potential impact as set out in Appendix 3 to this report;
4. the draft local scheme and policies set out in Appendix 4 and 4a to this report;
 - (i) the final scheme to be implemented as per option C as set out in paragraph 51 of this report;
 - (ii) the scheme and policies as set out in Appendices 4 and 4a be agreed;
 - (iii) town and parish council's be allocated their proportion of the indicative grant of £140,000 as set out in paragraph 19

And agrees that:

5. the local Council Tax Reduction scheme for 2016/17 be adopted as set out in the report and the CTS scheme policy as set out in Appendix 4 as follows:
 - (i) Not to change the support of a maximum 80 per cent of council tax liability for working age claimants.
 - (ii) Not to support those claimants that are deemed to hold capital over a certain level (reducing the current capital level from £16,000 to £6,000)

- (iii) Continue to give protection to families with children and working age vulnerable by still disregarding child benefit, war pensions and other related income categories.
- (iv) Continue the incentive for work by not increasing the taper by which additional income over the applicable is taken into account (retained at 20p for each £1 of income over the applicable amount).
- (v) To remove the blanket protection (to a maximum of 100 per cent of council tax liability) given to applicants with certain benefits and to replace it with a targeted (Exceptional Hardship Fund) scheme that would require individual applications and take into account individual circumstances including the claimant's income and essential outgoings (as set out in Appendix 4a). The Exceptional Hardship Fund to be allocated £204,000 of the potential savings.
- (vi) To continue to preserve certain enhancements to disabled claimants, partners and dependent children through the continued granting of additional disability premiums and the disregard of disability living allowances and personal independence payments as income.
- (vii) Mirror some amendments to the Housing Benefit national scheme that are due to come into effect during 2016/17 (Limiting backdating to one calendar month and remove Family Premium from 1 May 2016).
- (viii) Fully implement the minimum living wage (floor) for self-employed claimants after a start-up period of one year.

59. APPENDICES ATTACHED.

- [Appendix 1:](#) Summary of responses to consultation.
- [Appendix 1a:](#) Additional written text responses to the consultation.
- [Appendix 1b:](#) Comments received from parish and town councils to the consultation.
- [Appendix 2:](#) Equality impact assessment council tax support scheme.
- [Appendix 3:](#) Examples of impact on claimants.
- [Appendix 4:](#) Draft local scheme policy based on proposed option.
- [Appendix 4a:](#) Draft exceptional hardship fund policy.

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