

Stage 1 Equality Impact Assessment – Initial Screening

Assessor(s) Name(s):	Debbie Vallas
Directorate:	Resources
Date of Completion:	September 2019

Name of Policy/Strategy/Service/Function Proposal

Local Council Tax Reduction Scheme review of scheme for 2020/21

The Aims, Objectives and Expected Outcomes:

The original EIA stage 1&2 set out the scope of the EIA and can be found at:

<http://www.iwight.com/documentlibrary/download/eia-local-council-tax-support-stage-1-2>

Since 1st April 2013, the Council has maintained a local Council Tax Reduction scheme known as Local Council Tax Support (LCTS). This replaced the national Council Tax Benefit scheme, which ended on 31st March 2013. LCTS helps provide support to council taxpayers who have a low income. It supports the taxpayers by providing a reduction in the actual amount in Council Tax payable.

The Council has the ability to determine the level of support given to working age applicants only. The scheme for pension age applicants is determined by Central Government and therefore the ability of the Council to vary that part of the scheme is limited and can only enhance the national scheme in any event.

The Council has made a number of changes to the scheme since 2013 including the reduction to the level of the maximum support for working age to 70% and restricted to a maximum level band C Council Tax property. This is in addition to changes to the scheme to match the continuing changes to Housing Benefit and Universal Credit.

The amount of grant received from Government to pay for CTS has been included within general grant (revenue support grant) which has been significantly reduced each year resulting in less money available to meet the costs of CTS as well as significantly reduced resources to pay for all council services.

In order to meet this funding gap, the Council has to consider a reduction of local council tax support paid to working age claimants. The estimated gross cost of the Isle of Wight Council LCTS for 2018/19 is approximately £10.0 million. The Isle of Wight Council's share of this cost is around 86%, in line with the split of council tax with the Police and town and parish councils.

The total expenditure at 31 March 2019 was £10.0 million and at 30 August 2019 the expenditure was at £10.3 million. Since 2013 there has been a reduction in expenditure of £3.3 million which has already been reflected in previous years budgets. This is due to both a reduction in caseload and the changes to the working age scheme since 2013.

The assumed Settlement Funding Assessment (SFA) grant towards CTS during 19/20 = £5.480m. A

one-year spending review was held in September 2019 although specific allocations to individual local authorities are not expected to be announced until December 2019. The expectation is that the 2019-20 forecast figures will be rolled over to 2020-21 which would mean that the 2020-21 CTS grant would remain at the 2019-20 level of £5.480 million. This means there is currently a funding gap of £3.24 million.

An LCTS Exceptional Hardship Fund was introduced during 2016/17 to recognise the potential impacts to some low-income households that might be faced with genuine hardship as a result of the LCTS 2016/17 scheme changes agreed by Full Council 20 January 2016. This provision was reviewed again by Full Council January 2017 and November 2018 and continues to provide support for those in genuine hardship. This requires individual applications and takes into account individual circumstances including the claimant's income and essential outgoings

The proposed potential changes to the scheme for 2018/19

The corporate management team in consultation with Cabinet members determined that in light of the council's current financial circumstances that exploration of further options should be considered and that a full review be undertaken as to the effectiveness of the current LCTS scheme. A public consultation has been undertaken to gather views as to whether the current scheme should be changed. A summary of the results of the consultation are provided together with this Equality Impact Assessment. The corporate management team in consultation with Cabinet members is minded to make changes to the working age scheme to meet the need to change the scheme, not only to align with proposed changes to Housing Benefit, but also to deal with the main issues from the introduction of full-service Universal Credits for working age applicants and the need for simplification of the scheme.

Each of the above are examined in detail below.

Council Tax Reduction and the Full Service Roll Out of Universal Credit

The introduction of Universal Credit within the area has, as experienced in all other Local Authority areas, brought a number of significant challenges to both the administration of Council Tax Reduction, confusion for the customer because of changing council tax bills and therefore the collection of Council Tax generally. All sites within full-service areas have experienced the following:

A high number of changes to Universal Credit cases are received from the Department for Work and Pensions requiring a change to Council Tax Reduction entitlement. On average 40% of Universal Credit claimants have between eight and twelve changes in entitlement per annum. These changes result in amendments to Council Tax liability, the re-calculation of instalments, delays and the demonstrable loss in collection; and

Confusion for the customer as a result of the number of changes being made following the number of changes to their Universal Credit case and;

The reluctance of Universal Credit claimants to make a prompt claim for Council Tax Reduction leading to loss of entitlement.

It is clear that the existing means tested Council Tax Support scheme, which is too reactive to change, will not be viable in the longer term now that Universal Credit has been rolled out fully within the area. The move to a new more efficient scheme from 2020 is now imperative

It should be noted that the changes, if made, would only apply to the working age scheme although the consultation was open to all Council Taxpayers.

The main changes proposed that were consulted upon are listed below. Any changes if adopted will be effective from 1st April 2020:

Should the council continue to retain a CTS reduction scheme for working age council tax

payers that is deemed affordable

Should the Council Tax Reduction Scheme (CTR) adopt a proposed grid model from April 2020 and implement option 2 as the preferred income grid scheme

Should the council disregard Carers Allowance which is currently taken into account as an income in the calculation

Should the three current earnings disregards be replaced with a standard £25 disregard, irrespective of the person circumstances

Should the five current non-dependant deduction rates be replaced with a standard deduction of £2 per week for each non-dependant in a household

Should the council mirror the amendment to the Housing Benefit national scheme (Infected blood payments where payments are disregarded)

Should the council continue to provide an exceptional hardship fund that would require individual applications and take into account individual circumstances including the claimant's income and essential outgoings to assist those that are deemed to be in 'genuine hardship' and receive additional assistance based on need.

Please delete as appropriate:

- This is a proposed review and change to an existing policy/scheme

Key Questions to Consider in Assessing Potential Impact	
Will the policy, strategy, service or council function proposal have a negative impact on any of the protected characteristics or other reasons that are relevant issues for the local community and/or staff?	Yes
Has previous consultation identified this issue as important or highlighted negative impact and/or we have created a “legitimate expectation” for consultation to take place? A legitimate expectation may be created when we have consulted on similar issues in the past or if we have ever given an indication that we would consult in such situations	Yes
Do different groups of people within the local community have different needs or experiences in the area this issue relates to?	Yes
Could the aims of these proposals be in conflict with the council’s general duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and to foster good relations between people who share a protected characteristic and people who do not?	No
Will the proposal have a significant effect on how services or a council function/s is/are delivered?	Yes
Will the proposal have a significant effect on how other organisations operate?	Yes
Does the proposal involve a significant commitment of resources?	Yes
Does the proposal relate to an area where there are known inequalities?	Yes
<p>If you answer Yes to any of these questions, it will be necessary for you to proceed to a full Equality Impact Assessment after you have completed the rest of this initial screening form.</p> <p>If you answer No to all of these questions, please provide appropriate evidence using the table below and complete the evidence considerations box and obtain sign off from your Head of Service.</p>	

Protected Characteristics	Positive	Negative	No impact	Reasons

Age				Working age claimants of Council Tax support may receive a reduced level of assistance as compared with the former Council Tax Benefit Scheme. the new scheme will redistribute support and be more generous to those applicants on the lowest incomes; In addition, it will assist those who are disabled and those who have caring responsibilities
Disability				Those in receipt of a disability benefit are being protected to the same level as they currently are and will continue to receive maximum support of 70%.
Gender Reassignment				No specific impact other than for working age
Marriage & Civil Partnership				No specific impact other than for working age
Pregnancy & Maternity				No specific impact other than for working age
Race				No specific impact other than for working age
Religion / Belief				No specific impact other than for working age
Sex (male / female)				No specific impact other than for working age
Sexual Orientation				No specific impact other than for working age

Are there aspects of the proposal that contribute to or improve the opportunity for equality?	Yes
<p><i>If answered Yes, describe what these are and how they may be promoted or enhanced</i></p> <p>Due to the nature of the reductions in the level of support, all working age claimants have the potential to have reductions in their support, however, they can be considered for further assistance under a targeted protection scheme based on exceptional hardship.</p> <p>The scheme will continue to protect disabled claimants through the continued granting of additional disabled premiums and disregard as income of certain benefits such as Disability Living Allowance and Personal Independence Payments in appropriate cases and in line with Housing Benefit provisions.</p>	

Evidence Considered During Screening
<p>A full modelling exercise has been undertaken using specialised modelling software to establish the effects of the changes on claimants.</p> <p>The government has stated that council tax support for older people will not be reduced as a result of the introduction of the council tax reduction scheme reform. This is because the government wants to ensure that low income pensioners, who would struggle to pay council tax without additional support, and whom the government does not expect to work to increase their income, will continue to receive support for their council tax.</p> <p>Pensioner protection will be achieved by keeping in place national rules which broadly replicate the former council tax benefit scheme.</p>

As part of the changes the Council must give consideration to the effects on working age claimants only and in particular any vulnerable groups in the design of a new system.

Central Government has not been prescriptive in how it expects the Council to do this but points to the Council's existing responsibilities including the Child Poverty Act 2010, and the Housing Act 1996 as well as the public sector equality duty in section 149 of the Equality Act 2010.

A full analysis of the existing caseload of those in receipt of Council Tax Support has been undertaken and the expected effects of the proposed changes have been completed in the stage 2 EIA assessment.

Head of Service Sign off:	Claire Shand/Sharon Betts
Advice sought from Legal Services (Name)	Justin Thorne
Date	3 October 2019

**Isle of Wight Council
Second Stage Equality Impact Assessment
Council Tax Reduction Scheme 2020/21**

Table of Contents

Name of Policy/Strategy/Service/Function Proposal	3
The Aims, Objectives and Expected Outcomes:	3
Changes made from 1 April 2013 (from the original Council Tax Benefit scheme)	3
Changes made from 1 April 2014.....	4
Changes made from 1 April 2016.....	4
Changes made from 1 April 2017.....	4
Changes made from 1 April 2018.....	5
Changes made from 1 st April 2019	5
Council Tax Reduction and the Full Service Roll Out of Universal Credit.....	6
The need for a simplified approach to the Council Tax Reduction Scheme.	7
The proposed approach for the 2020/21 Council Tax Reduction Scheme.....	7
Transition to the new scheme and the Exceptional Hardship Scheme	10
Scope of the Equality Impact Assessment	11
Method of Consultation.....	11
Responses to the Consultation	13
Analysis and Assessment	13
Action and Improvement Plan	13
Appendix 1	14
Recommendations.....	14
Appendix 2	16
Action / Improvement Plan	16
Appendix 3	19
Consultation Responses.....	19

Name of Policy/Strategy/Service/Function Proposal

The Council Tax Reduction Scheme for 2020/21

The Aims, Objectives and Expected Outcomes:

1. Council Tax Reduction (CTR) was introduced by central government in April 2013 as a replacement for the Council Tax Benefit scheme administered on behalf of the Department for Work and Pensions (DWP). As part of its introduction, the government in transferring the responsibility to individual councils set requirements namely:
 - the duty to create a local scheme for **Working Age** applicants with billing authorities.
 - funding was initially reduced by the equivalent of ten per cent from the levels paid through benefit subsidy to authorities under the previous Council Tax Benefit scheme; and
 - persons of **Pension age**, although allowed to apply for Council Tax Reduction, would be dealt with under regulations prescribed by central government and not the authorities' local scheme.
2. The current support scheme created by the council is divided into two schemes, with pension age applicants receiving support under the rules prescribed by central government, and the scheme for working age applicants being determined solely by the local authority.
3. Pensioners, subject to their income, can receive up to 100 per cent support towards their council tax. The council has no powers to change the level of support provided to pensioners and therefore any changes to the level of CTR can only be made to the working age scheme.
4. When CTR was introduced in 2013, the Council broadly adopted the previous means tested Council Tax Benefit scheme as the basis of awarding support. However, due to the reduction in funding, a number of changes have been made over the years to the working age scheme. These are as follows:

Changes made from 1 April 2013 (from the original Council Tax Benefit scheme)

5. A decision was made to reduce maximum entitlement for working age non-vulnerable claimants to 80 per cent of their council tax liability. The reduction in support was deferred for one year as central government offered additional payments if councils' limited their reduction and maintained a scheme that didn't reduce maximum entitlement to less than 91.5 per cent;
6. To safeguard those applicants, their partner, or disabled dependent child who were deemed working age 'vulnerable', the CTR scheme provided the same level of assistance as the previous Council Tax Benefit Scheme (100 per cent); and

7. The Second Adult Rebate scheme for working age was removed, this provided a level of discount based on the income and circumstances of any 'second adult' (not the applicant or partner).

Changes made from 1 April 2014.

8. From 1 April 2014, CTR was restricted to a maximum of 80 per cent entitlement for working age. Vulnerable applicants continued to be granted protection at 100 per cent on a 'blanket' policy;

Changes made from 1 April 2016

9. From 1 April 2016, the Family Premium was removed and backdating limited to one calendar month in line with the national changes to the Housing Benefit scheme. The family premium of £17.45 was previously awarded to households with children within the calculation of CTR and was withdrawn from Housing Benefit from May 2016. This change was approved to bring CTR in line with Housing Benefit regulations.
10. The blanket protection for certain claimants was removed and replaced by an exceptional hardship fund which gives a tailored approach to those cases suffering exceptional hardship. A blanket protection was previously provided to those working age claimants, their partners or dependent children who received certain (disability) benefits 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 was to take into account individual circumstances, including the claimant's income and essential outgoings.
11. For self-employed applicants, the minimum income floor was introduced into the scheme. This sets a minimum level of income that is used in the calculation of CTR for certain cases where they have been in business for more than 12 months. These changes align with the approach taken in Universal Credits.
12. The capital limit was reduced from £16,000 to £6,000. The maximum level of capital a claimant could own before they no longer qualified for CTR was previously £16,000, and this was reduced to £6,000 in 2016.

Changes made from 1 April 2017

13. From 1 April 2017, the following changes were made to align CTR with changes made to housing benefit:
 - Reduction in the period for which a person can be absent from Great Britain and still receive CTR from thirteen weeks to four weeks. A Change introduced in housing benefit which excluded a person from housing benefit if they were out of the country for 4 weeks or more. This change was approved to bring CTR in line with Housing Benefit regulations;

- From the 1 April 2017 new Employment Support Allowance (ESA) claimants who go into the work related activity group will not receive additional monies in their ESA. This component was £29.05 per week in the calculation. This change was approved to bring CTR in line with Housing Benefit regulations;
 - To limit the number of dependent children within the calculation of CTR to a maximum of two for any new children born on or after 1 April 2017 This change was approved to bring CTR in line with Housing Benefit regulations;
14. To remove entitlement to the Severe Disability Premium in line with changes made to housing benefit where another person is paid Universal Credit (Carers Element). This change was approved to bring CTR in line with Housing Benefit regulations.

Changes made from 1 April 2018

15. From 1 April 2018, further changes were made to CTR to provide additional funding to the council, namely:
- reducing the maximum entitlement for working age claimants to 70 per cent of their council tax liability;
 - restricting Council Tax Reduction to a maximum Band C valuation - this affects all applicants whose dwellings have a band D or higher; and
 - disregarding the new Bereavement Support Payments in line with changes made to Housing Benefit.
16. The working age scheme for 2018/19 required all working age applicants to pay a minimum of 30 per cent of their council tax (a maximum level of CTR of 70 per cent) and CTR is calculated up to a maximum of band C for council tax valuation purposes. Any applicants living in premises which have a council tax band of D, E, F, G or H have their entitlement calculated on band C levels.

Changes made from 1st April 2019

17. Two minor changes were made to the scheme with effect from 1st April 2019 namely:
- To disregard the new Infected Blood Scheme payments in line with changes made by government to the housing benefit scheme rules. Five payment schemes have provided financial support to people infected with HIV and/or hepatitis C as a result of contaminated National Health Service blood or blood products. These schemes are run by: The Eileen Trust, The Macfarlane Trust, MFET Ltd, The Skipton Fund and The Caxton Foundation. Payments from these schemes are fully disregarded in housing benefit and can be achieved without consultation in CTR using the Exceptional Hardship Fund policy. Any applicants receiving the new Infected Blood Scheme Payments will be given additional support, if required, through the exceptional hardship facility that already exists within the Council Tax Reduction; and

- To maintain the CTR scheme but allowing for any minor adjustments to applicable amounts and non-dependant charges in line with housing benefit and the local council tax reduction scheme for pension age applicants.
18. In addition, management was tasked to develop options for an alternative council tax reduction banded scheme for consideration and potential implementation with effect from 1 April 2020 to reduce the administrative burden placed on the council as a result of the introduction of Universal Credit.
19. Work has been ongoing over the past year and the following results have been identified

The main issues with the current scheme

20. There are a number of issues with the current scheme that will need addressing if the system is to continue to provide effective support to low income taxpayers and also if the Council is able to provide the service in an efficient manner. The main issues are as follows:

- The introduction of full-service Universal Credit for working age applicants; and
- The need for a simplification of the scheme;

21. Each of the above are examined in detail below.

Council Tax Reduction and the Full Service Roll Out of Universal Credit

22. The introduction of Universal Credit within the area has, as experienced in all other areas, brought a number of significant challenges to both the administration of Council Tax Reduction and also the collection of Council Tax generally. All sites within full-service areas have experienced the following:

- a. The reluctance of Universal Credit claimants to make a prompt claim for Council Tax Reduction leading to loss of entitlement;
- b. A high number of changes to Universal Credit cases are received from the Department for Work and Pensions requiring a change to Council Tax Reduction entitlement. On average 40% of Universal Credit claimants have between eight and twelve changes in entitlement per annum. These changes result in amendments to Council Tax liability, the re-calculation of instalments, delays and the demonstrable loss in collection; and
- c. The increased costs of administration through multiple changes with significant additional staff and staff time being needed.

23. It is clear that the existing means tested Council Tax Reduction scheme, which is too reactive to change, will not be viable in the longer term now that Universal Credit has been rolled out fully within the area. The move to a new more efficient scheme from 2020 is now imperative.

The need for a simplified approach to the Council Tax Reduction Scheme.

24. Notwithstanding the introduction of Universal Credit, the existing scheme is based on an ‘old fashioned;’ means tested benefit scheme. It has major defects namely:
- It is complex for customers to understand and is based on a complex calculation of entitlement;
 - The administration for staff is complex, with staff having to request significant amounts of information from applicants;
 - Staff have to undergo significant training to be proficient in processing claims;
 - The timescales for processing applications is lengthy mainly due to the complexity and evidence required to support the applications; and
 - The administration of the scheme is costly when compared to other discounts for Council Tax.
25. Clearly there is a need now to simplify the scheme, not only to mitigate the effects of Universal Credit, but also make it easier for customers to make a claim and to significantly reduce the costs of administration.

The proposed approach for the 2020/21 Council Tax Reduction Scheme

26. In view of the problems being experienced with the current scheme, it is proposed that an alternative approach be taken from 2020/21. The approach has been to fundamentally redesign the scheme to address all of the issues with the current scheme and in particular;
- a. The problems with the introduction of full-service Universal Credit; and
 - b. The significant increase in administration costs due to the high level of changes received in respect of Universal Credit;
27. Work has been ongoing since April 2019 on a new scheme which is now nearing completion. Consultation has been undertaken with the public and the precepting authorities. If accepted by the Council, the new scheme would take effect from 1st April 2020. The consultation considered two approaches and the following proposed scheme is the one most popular with both the public and preceptors and also is the one recommended for implementation.
28. The proposed new scheme has a number of features as follows:
- a. The overall expenditure (cost) of the scheme will remain broadly as at present;
 - b. The changes can **only be made to the working age schemes** as the current schemes for pensioners is prescribed by Central Government;
 - c. The current means - tested schemes will be replaced by a simple income grid model as shown below:

Band	Level of CTR	Couple with no children	Couple with children	Single parent with two or more children	Single parent with one child	Single person
1	70%	in receipt of a disability benefit				
2	70%	in receipt of a passported benefit				
3	70%	£0.00 - £115.00	£0.00 - £250.00	£0.00 - £210.00	£0.00 - £140.00	£0.00 - £75.00
4	60%	£115.01 - £165.00	£250.01 - £300.00	£210.01 - £260.00	£140.01 - £190.00	£75.01 - £125.00
5	40%	£165.01 - £215.00	£300.01 - £350.00	£260.01 - £310.00	£190.01 - £240.00	£125.01 - £175.00
6	20%	£215.01 - £265.00	£350.01 - £400.00	£310.01 - £360.00	£240.01 - £290.00	£175.01 - £225.00

- d. It is proposed that the highest level of discount will be set at a maximum level of liability (70%) and all current applicants that are in receipt of a 'passport benefit' such as Income Support, Jobseeker's Allowance (Income Based) and Employment and Support Allowance (Income Related) receive maximum discount;
- e. It is proposed that the highest level of discount will be set at a maximum level of liability (70%) and all current applicants that are in receipt of a 'disability benefit' such as Disability Living Allowance or Personal Independence Payments receive maximum discount;
- f. As with the current scheme, the payment of CTR will be limited to Council Tax Band C level. This means any applicants living in premises which have a council tax band of D, E, F, G or H have their entitlement calculated on band C levels
- g. All other discount levels are based on the applicant's (and partner's, where they have one) net income;
- h. The scheme allows for variation in household size with the levels of income per band increasing where an applicant has a partner, and / or dependants
- i. Where an applicant had non-dependants living with them, a standard deduction of £2 per week will be made. This is a significant change and means that the administration of the scheme will be more straightforward whilst also protecting low income families where adult sons and daughters for example remain at home;

- j. To encourage work, a standard £25 per week disregard will be provided against all earnings for all applicant types. This will take the place of the current standard disregards and additional earnings disregards. Where a family also receives a childcare disregard (for childcare costs not paid for by Central Government schemes), the income levels in the 'grid scheme' are set at a higher rate;
- k. Mirror the amendment to the Housing Benefit national scheme to disregard Infected blood payments as income and capital. These schemes are run by the Eileen Trust, The McFarlane Trust, MMEF Limited, the Skipton Fund and the Caxton Foundation.
- l. Disability benefits such as Disability Living Allowance and Personal Independence Allowance will continue to be disregarded and, in addition, the Support Component of Employment and Support Allowance and Carer's Allowance will also be disregarded, again providing additional protection with the scheme. The disregard of Carer's Allowance is a significant change in that currently the income is taken into account within the scheme;
- m. Child benefit and Child Maintenance will continue to be disregarded;
- n. The total disregard on war pensions and war disablement pensions will continue;
- o. There will be a one-month limit to backdating;
- p. The capital limit under the new scheme will be the same as at present namely £6,000 but there will be no calculation of tariff or 'assumed' income from any capital held;
- q. The current approach to for Self Employed applicants and directors will be maintained with the use of a minimum income floor.

How the new scheme will address the problems with the current Council Tax Reduction

- 29. Due to the simplicity of the proposed new scheme and by taking a more 'Council Tax discount approach', it will address the problems associated with the increased administration caused by failings in the current scheme and Universal Credit as follows:
- 30. **The scheme will require a simplified claiming process.** All applicants will see a significant reduction in the claiming process and where possible Council Tax Reduction will be awarded automatically. These changes will have the following distinct advantages namely:
 - **Speed of processing** - all claims will be able to be calculated promptly and largely automatically without the need to request further information which inevitably leads to delays;
 - **Maintenance of collection rates** - the new scheme will avoid constant changes in discount, the need for multiple changes in instalments and therefore assist in maintaining the high collection rates currently achieved. The increased level of

discount will assist all those applicants on the lowest levels of income, again improving the overall collection rate;

31. **The income bands are sufficiently wide to avoid constant changes in discount.** The current Council Tax Reduction scheme is very reactive and will alter even if the overall change to the person's liability is small. This is leading to constant changes in Council Tax liability, the need to recalculate monthly instalments and the requirement to issue a large number of Council Tax demands. The effect of this is that Council Tax collection is reduced. The new scheme, with its simplified income banding approach will have the following advantages:
- Only significant changes in income will affect the level of discount awarded;
 - Council Taxpayers who receive Council Tax Reduction will not receive multiple Council Tax demands and adjustments to their instalments; and
 - The new scheme is designed to reflect a more modern approach, where any discount changes it will be effective from the day of the change rather than the Monday of the following week;

Transition to the new scheme and the Exceptional Hardship Scheme

32. The Council must be mindful that any change in scheme or a transition to a new scheme may have result in a change to the entitlement of certain applicants.
33. Inevitably, with any change in scheme, there will be both winners and losers although the proposed scheme has been designed to protect the most vulnerable. Whilst the new scheme has been designed to protect vulnerable groups and to, where possible, minimise any reductions in entitlement, it is proposed that the new scheme will contain additional provisions to protect individuals who experience exceptional hardship. Where any applicant is likely to experience exceptional hardship, they will be encouraged to apply for an exceptional hardship payment. The Council will consider all applications for exceptional hardship on an individual basis, taking into account available income and essential outgoings. Where appropriate further support will be given to the applicant.
34. This approach will enable individual applicants to be dealt with in a fair and equitable manner. The Exceptional Hardship Scheme will form part of the Council Tax Reduction scheme and fall to be paid through the Collection Fund.

Scope of the Equality Impact Assessment

35. This Equality Impact Assessment examines the potential effects of each of the changes and particularly the effects where any of the options were to be adopted. This stage 2 EIA particularly deals with the propose changes to Council Tax Reduction Scheme.
36. Please note that Pensioner protection will be achieved by keeping in place national rules, which broadly replicate the council tax benefit scheme, which existed prior to 1st April 2013.
37. As part of the changes, the Council needs to give consideration to the effects on working age claimants only and in particular any vulnerable groups in the design of a new system.
38. Central Government has not been prescriptive in how it does this but points to the Council's existing responsibilities including the Child Poverty Act 2010, the Disabled Person Act 1986 and the Housing Act 1996 as well as the public sector equality duty in section 149 of the Equality Act 2010.

Method of Consultation

The following methods have been used to obtain the views of taxpayers

Stakeholders	Methodology
1.Existing applicants (both working age and pensionable age)	Online survey via questionnaire explaining proposals and likely impact Paper survey if requested
2.Council taxpayers and service users generally	Online Survey via questionnaire explaining proposals and likely impact Paper survey if requested
3. Interested organisations and groups.	Email sent to Anti-Poverty Working Group and Members to raise awareness and for them to circulate to their customers Focus groups held for service users and council sections to attend Email to all Parish and Town Council Clerks to raise awareness and seek their response Letter sent to the Police & Crime Commissioner seeking views.
General Awareness	
Provision of information and awareness raising of changes and proposals	www.iwight.com Post Cards sent to all existing Local Council Tax Support customer (10,500 sent) Press releases Face to face communication at customer service points Information in libraries, The Council's Facebook and Twitter sites (weekly promotions)

Stakeholders	Methodology

Responses to the Consultation

The Council received 199 responses to the consultation, the number is in line with previous consultations and represents a confidence level of 84.2%. Full details of the responses are given within Appendix 3.

Analysis and Assessment

Recommendations, having regard to the potential changes are given within Appendix 1 as well as the likely effect on applicants generally.

Action and Improvement Plan

An action and improvement plan is included within Appendix 2.

**Appendix 1
Recommendations**

It is recommended, based on the original intentions of the Council and also on the outcomes of the consultation that the following actions are taken:

1. Should the Council maintain a scheme for working age applicants?
 - **Recommendation** - to move to the full income banded scheme as proposed in the consultation;
 - **Recommendation** - that all the changes proposed in the new scheme be implemented as per the Council's original proposal;
 - **Recommendation** - that the Council's Exceptional Hardship scheme be maintained and offered to all Council Taxpayers suffering exceptional hardship.

Appendix 2
Action / Improvement Plan

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age	Negative Impact	Working age claimants of Council Tax support may receive a reduced level of assistance as compared with the former Council Tax Benefit Scheme.	Yes - the new scheme will redistribute support and be more generous to those applicants on the lowest incomes; In addition, it will assist those who are disabled and those who have caring responsibilities	The existing means tested scheme will be replaced by an income-based scheme. An exceptional hardship fund will be available for those claimants in most severe financial need.
Disability	Positive impact	N/A	N/A	All disabled persons receiving a qualifying benefit will receive maximum discount under the scheme as they were identified during the analysis work as being the group of people who are struggling to pay their council tax. Therefore, the changes to the scheme will either not change their current level of support, or provide additional support if they are not already receiving the maximum level of 70%. In addition, the Exceptional Hardship Fund is available to assist any customers with additional support required.
Gender Reassignment	No impact	No issue relating to this protected characteristic		
Marriage & Civil Partnership	No impact	No issue relating to this protected characteristic		
Pregnancy & Maternity	No impact	No issue relating to this protected characteristic		
Race	No impact	No issue relating to this protected characteristic		
Religion / Belief	No impact	No issue relating to this protected characteristic		
Sex (male or female)	No impact	No issue relating to this protected characteristic		
Sexual Orientation	No impact	No issue relating to this protected characteristic		
HR & workforce issues	Not known at this stage	Potential loss of resourcing in the future	The Council will monitor the overall impact of work and resource	

Area of impact	Is there evidence of negative positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
			accordingly if the preferred scheme is adopted and undertake an initial EIA screening on the impact of HR workforce issues.	
Human Rights implications if relevant	No impact	N/A		

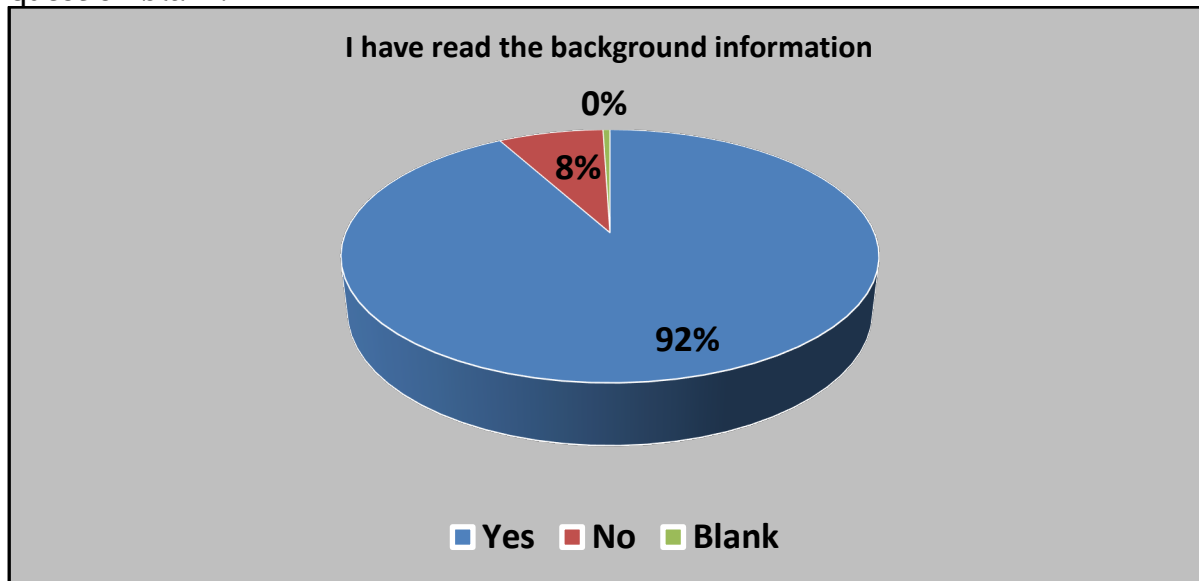
**Appendix 3
Consultation Responses**

Results from the IWC Local Council Tax Support Scheme Consultation 2020/21

The above consultation was undertaken between 10 June 2019 and 5 August 2019. On completion, a total of 199 responses had been received. The charts below detail the responses received for each question asked of the participants.

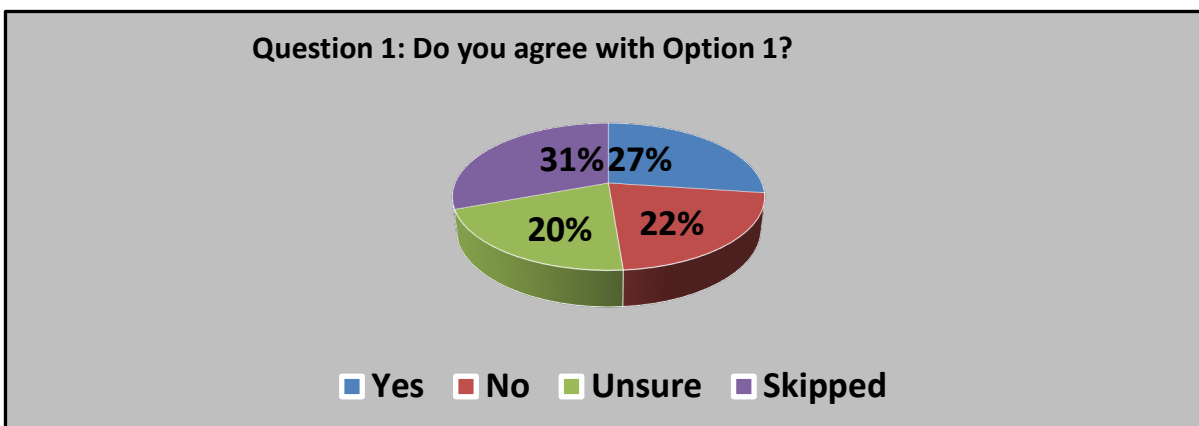
I have read the background information about the Local Council Tax Support scheme.

183 respondents indicated that they had read the background information about the Local Council Tax Support scheme, which equates to 92% of participants. 16 participants (8%) either did not read the background information before completing the survey or left this question blank.



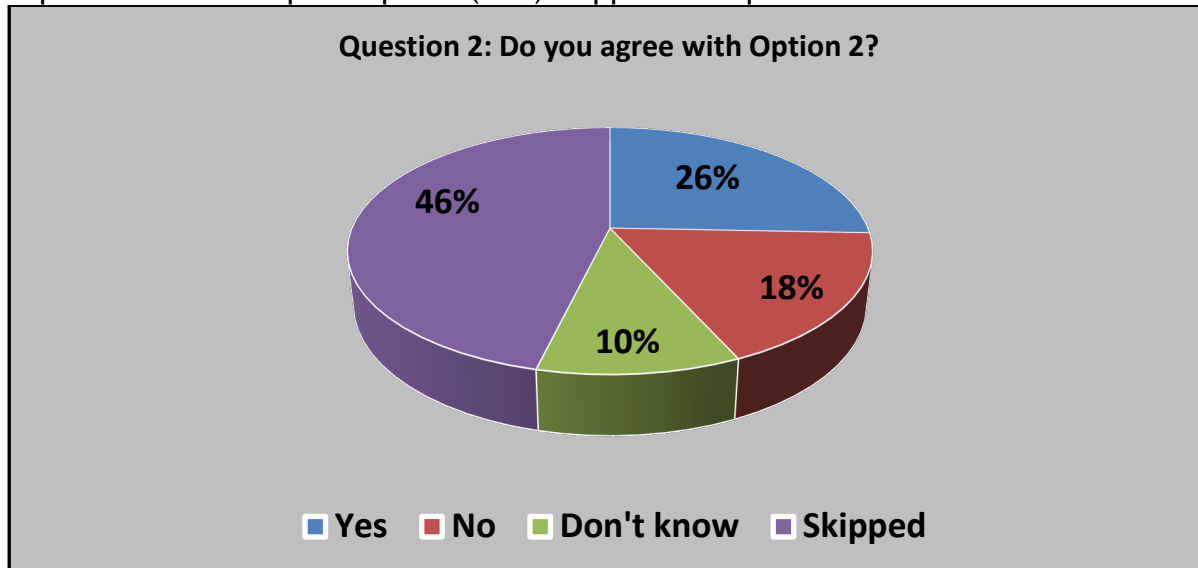
Question 1: Do you agree with Option 1?

54 of the consultation participants (27%) indicated that they agreed with Option 1 - the introduction of an 'income grid' scheme to replace the current scheme for all working age applicants, as proposed by the Isle of Wight Council. 43 participants (22%) did not agree with this option and 102 (51%) of participants responded that they 'Don't know' or skipped this question.



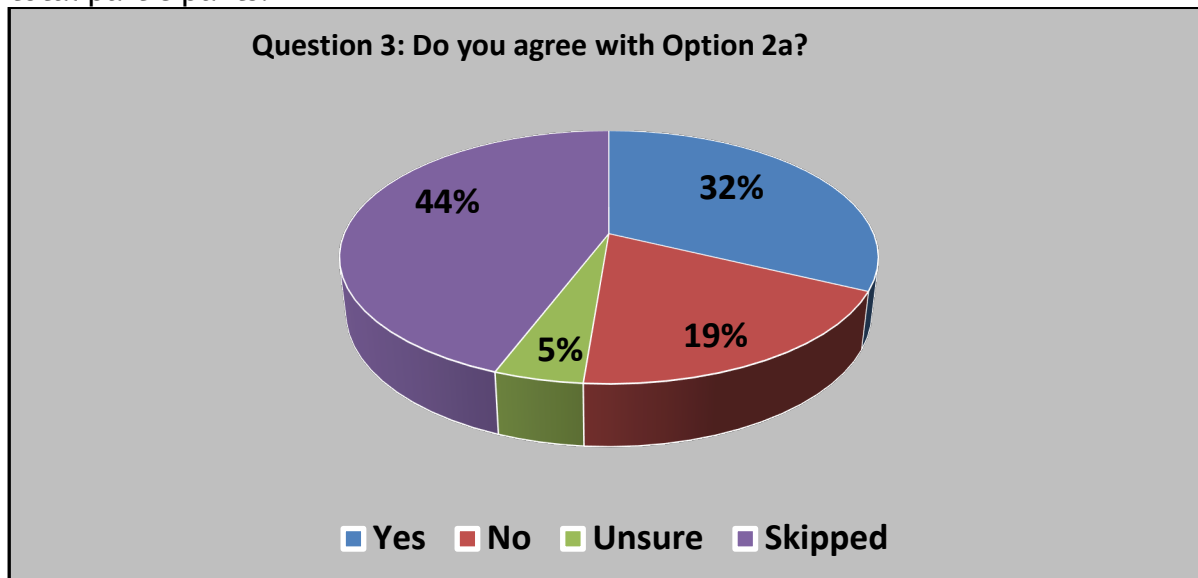
Question 2: Do you agree with Option 2?

Of the 199 participants, 51 agreed with Option 2 - the introduction of an 'income grid' scheme with additional factors to replace the current scheme for working age claimants, which equates to 26% of the total number of participants. 35 participants (18%) indicated that they did not agree with Option 2, and 21 did not know whether they agreed, which represents 10%. 92 participants (46%) skipped this question.



Question 3: Do you agree with Option 2a?

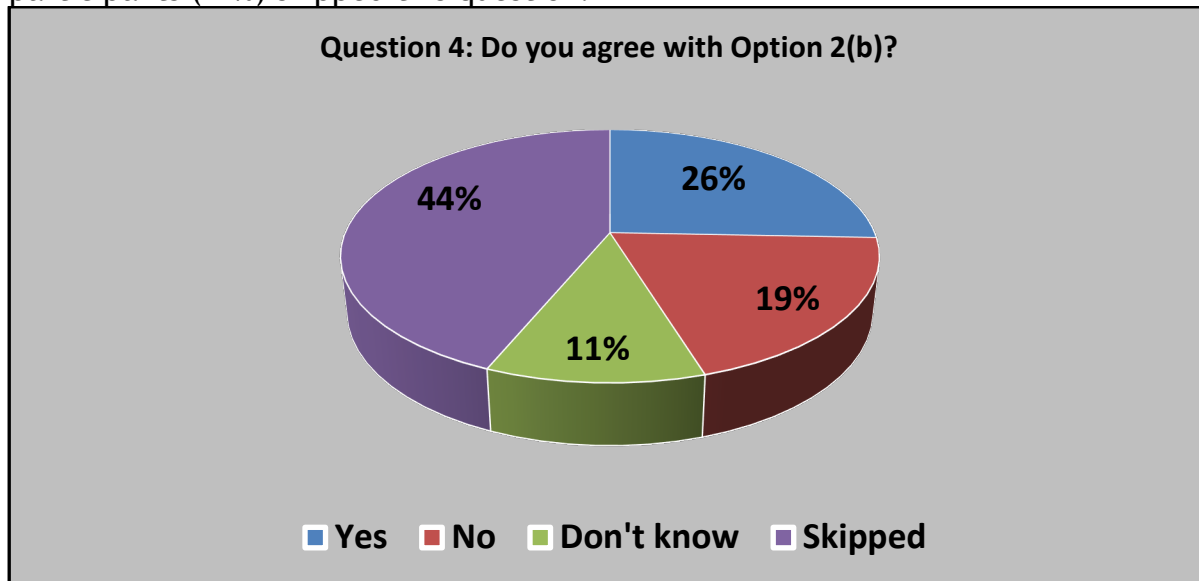
64 participants indicated that they agreed with Option 2a - to disregard Carer's Allowance which is currently taken into account as income, which was 32% of the total. 38 respondents (19%) did not agree with Option 2a, and 9 respondents (5%) did not know whether they agreed. 88 participants skipped this question which represents 44% of the total participants.



Question 4: Do you agree with Option 2b?

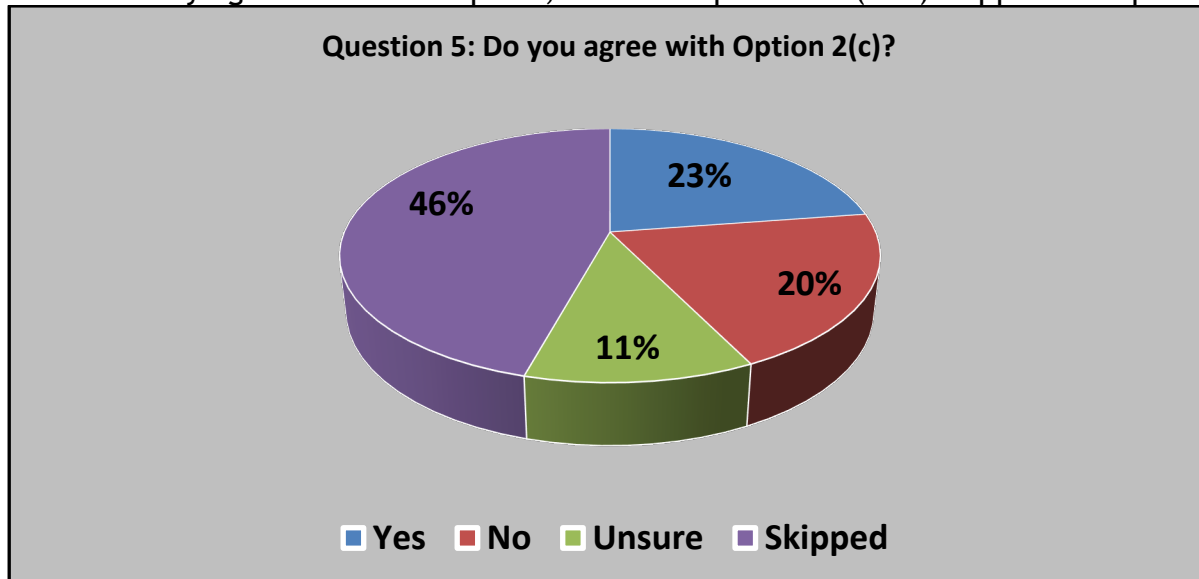
Of the 199 participants, 51 agreed with Option 2b which represents 26%, and 39 (19%) did not agree with this option - to remove the current earnings disregards and replace them

with a standard £25 disregard irrespective of a person's circumstances. 22 respondents stated they did not know whether they agreed with Option 2b, which equates to 11%, 87 participants (44%) skipped this question.



Question 5: Do you agree with Option 2c?

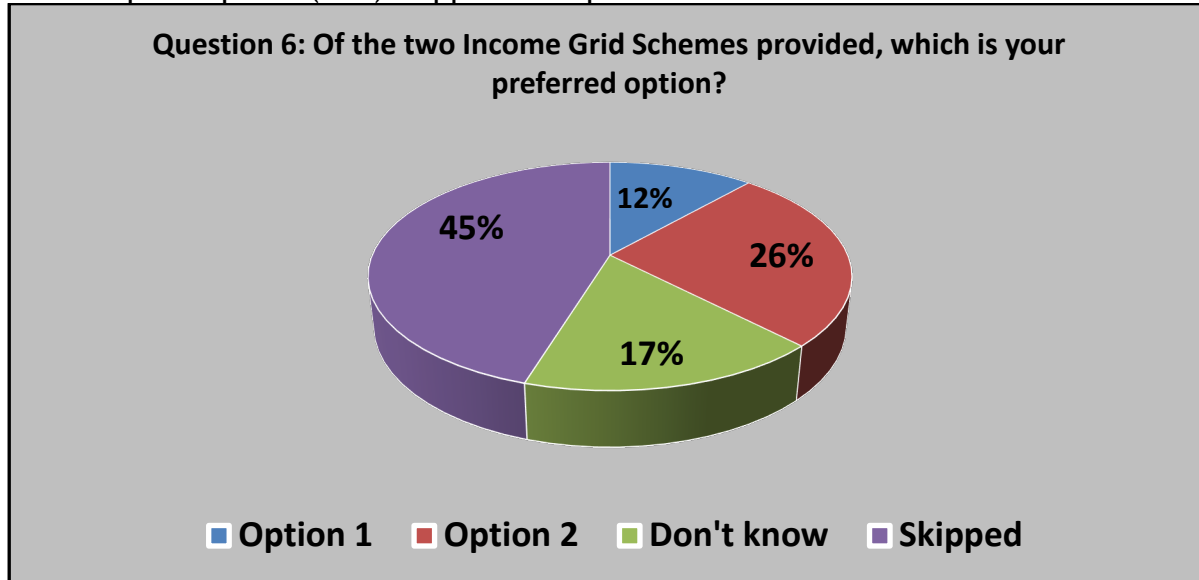
Option 2c proposes to remove the current Non-Dependant Deduction rates and replace them with a standard deduction of £2 per week for each non-dependant living in the household. 45 participants (23%) agreed with this option and 40 indicated they did not agree which represents 20% of the total respondents. 23 participants (11%) did not know whether they agreed with this option, and 91 respondents (46%) skipped this question.



Question 6: Of the two 'income grid' schemes provided, which is your preferred option?

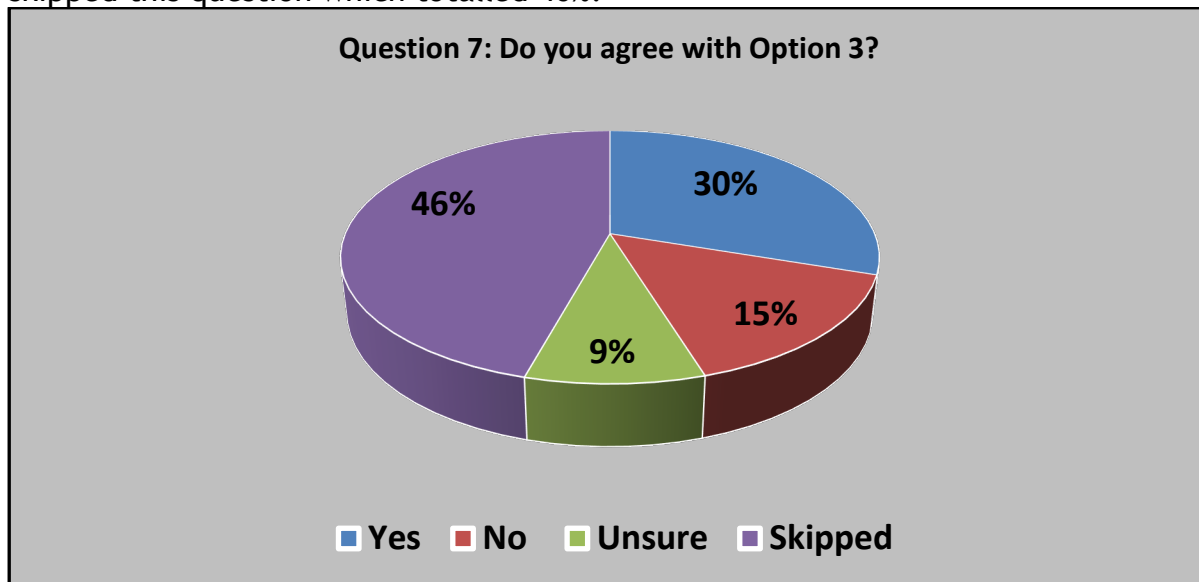
Of the 199 participants, 23 respondents indicated that they preferred Option 1 which corresponds to 12%. Option 2 was the preferred option for 52 participants which amounts

to 26% of the total, and 34 respondents (17%) did not know which their preferred option was. 90 participants (45%) skipped this question.



Question 7: Do you agree with Option 3?

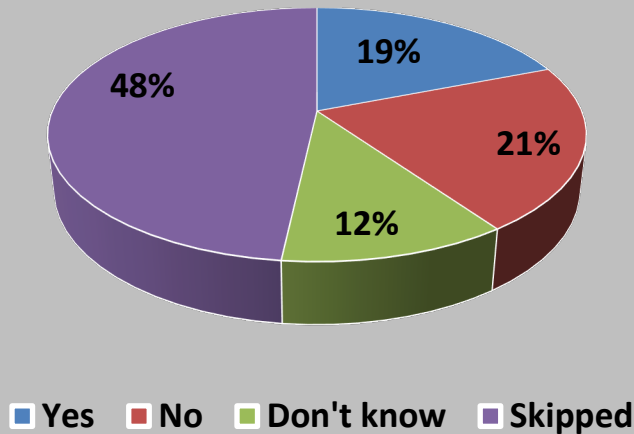
60 contributors (30%) agreed with Option 3 which proposed to disregard any payment made under Infected Blood and Thalidomide Regulations in full, whereas 30 participants did not agree with this option which equates to 15% of the total number. There were 18 respondents (9%) who did not know whether they agreed with Option 3, and 91 participants skipped this question which totalled 46%.



Question 8: Do you agree with Alternative 1?

Alternative 1 proposed to keep the scheme as it is currently. Of the 199 participants, 38 agreed with Alternative 1 which represented 19% of the total number of respondents. 42 (21%) stated that they disagreed with Alternative 1, and 23 respondents (12%) indicated that they did not know whether they agreed with this alternative. 96 contributors skipped this question, which equates to 48% of the total number of participants.

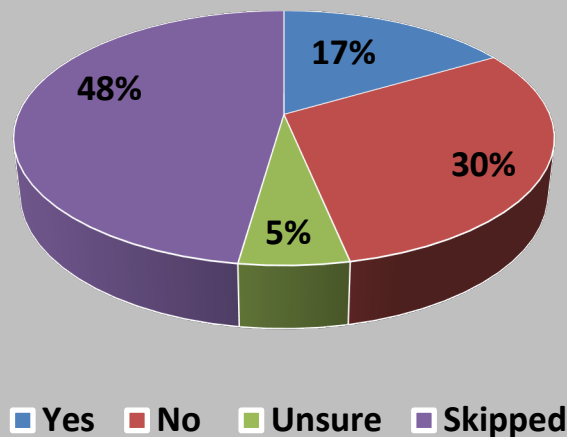
Question 8: Do you agree with Alternative 1?



Question 9: Do you agree with Alternative 2?

33 respondents (17%) indicated that they agreed with Alternative 2 - reducing the maximum level of support to 60 per cent or 65 per cent, whereas 60 contributors (30%) disagreed. 11 participants (5%) did not know whether they agreed with this alternative, and 95 participants skipped this question which relates to 48% of the total.

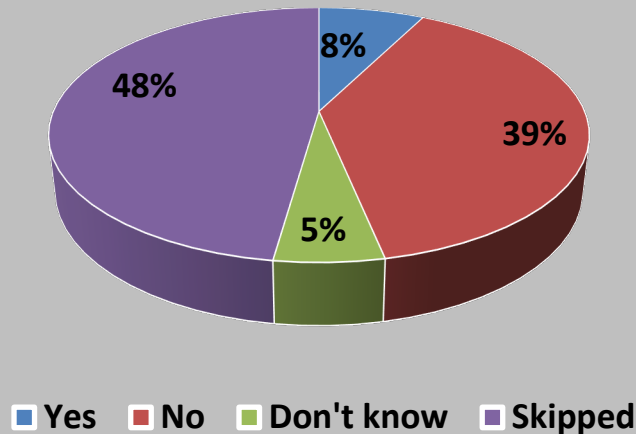
Question 9: Do you agree with Alternative 2?



Question 10: Do you agree with Alternative 3?

Alternative 3 detailed increasing the level of Council Tax. Of the 199 respondents, 15 stated that they agreed with this alternative which represents 8% of the total participants. 78 participants (39%) did not agree with Alternative 3, 11 (5%) did not know whether they agreed, and 95 respondents (48%) skipped this question.

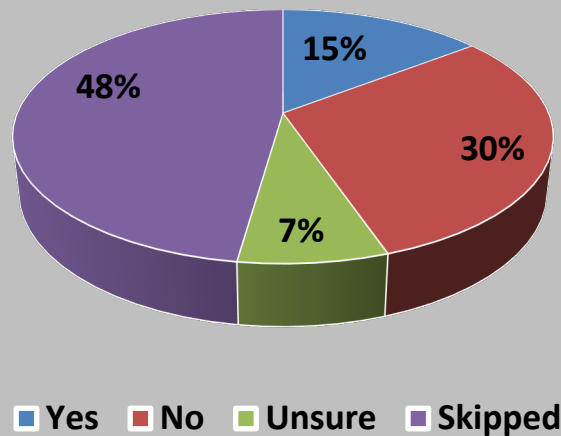
Question 10: Do you agree with Alternative 3?



Question 11: Do you agree with Alternative 4?

29 contributors stated that they agreed with Alternative 4, to find savings from reducing or cutting other council services, which equates to 15% of the total participants. 60 participants (30%) indicated that they did not agree with this alternative and 15 (7%) did not know if they agreed. 95 participants skipped this question which represents 48% of the total.

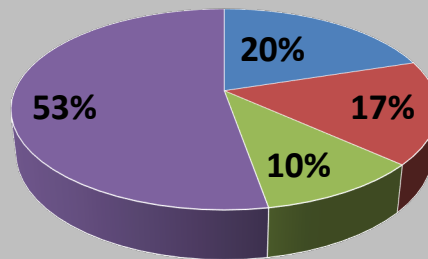
Question 11: Do you agree with Alternative 4?



Question 12: Should the Council keep the current Local Council Tax Support scheme? (Should it continue to reduce council tax for eligible claimants in the way and to the extent that it does at the moment?)

Of the 199 participants, 40 replied 'Yes' to this question which represents 20% of the total respondents. 33 participants (17%) replied 'No' to this question, and 21 did not know whether the Council should keep the current Local Council Tax Support scheme, which equates to 10% of the total. 105 contributors (53%) did not respond to this question.

Question 12: Should the Council keep the current Local Council Tax Support Scheme? (Should it continue to reduce Council Tax for eligible claimants in the way and to the extent that it does at the moment?)



■ Yes ■ No ■ Don't know ■ Skipped

Question 13: If 'Yes', how would we meet the administration costs this would create as a result?

There were then 36 comments submitted:

Become more efficient throughout your organisation.
Chain ferry removal and sold on to someone else. Or sell it off as a franchise.
Cut the expenses allowance to councillors
Get rid of at least half of the councillors cut the amount of money they are paid reduce expense claims by at least 75% And all the so called experts paid for by the council as consultants
GET RID OF USLESS COUNCILORS
Higher earners take a pay cut. Reduce- hospitality and expenses eg. trips to Jersey! Invest in an auto calculating system for Universal Credit recovers who work and month by month their Council Tax amount changes.
I am sure you can cut the few services that are left and ran by the council ,a cut the wages of the current Councillors that have proved not good value ,Send the floating bridge back and demand a refund ,and charge a tourist tax as they do in Spain and elsewhere to pay for the toilets ,beach clean ,rubbish and bring back some services ,any more advice please ask,I do not currently charge a Consultation fee
I don't have access to the figures so those that do can sort it out without penalising vulnerable residents.
Ideally provide full employment so that LCTS is not required.
Increase Council Tax
Look at all options again first
Make savings elsewhere
Make the savings some where else as not every one has or will be moved onto Universal Credit at this time.

Perhaps you could cut those new management jobs that you created last year. https://www.countypress.co.uk/news/16312258.400000-bill-for-new-managers-at-county-hall-branded-an-insult-to-isle-of-wight-tax-payers/
Put more information on the council website instead of leaflets and booklets, to make savings on administration costs as most people now have access to a computer.
Reduce councillors pay
Reduce councillors salaries and expense accounts.
Reduce financial waste in the council. Reduce expense budgets. Cut / reduce the highest rates of pay in the council. Sell art investments and use the to invest in revenue generating projects. Sell prime council owned office buildings and move council offices to functional cheaper rented industrial area complexes.
Reduce the extortionate pay of consultants and executives. More qualified employees would do the work at a much lesser cost per annum. Anyone would join a gravy train if given the opportunity. The council is one of those. Any private company would be bankrupt without a bottomless pit. Budgets are totally misspent including. I do not know how they can sleep at but ripping off the tax payer with irresponsible decision making.
Reduce the pay of the top earners(you know who you are) in the council. The disparity of wages in county hall is a disgrace.
reduce the payroll of higher paid salaries
Reduction in councillors wages
Scheme 2 sounds fairer, and fits in with the new Universal Credit.
Stop giving pay rises to those at the top i.e. councillors and stop wasting taxpayers money on frivolities
Stop people having to hand in uc details every month
Stop spending endless amounts on the stupid floating bridge and high allowances to senior councillors!
STOP USING COMPUTERS AND USE PEN & PAPER INSTEAD ALL YOU THINK IS EVERYONE CAN USE COMPEUTERS I'M 60ISH I CAN'T BRING BACK HANDS ON STOP WASTEING INK TREES THIS FORM FOR YES/NO 2 SHEETS REASONS NO MORE THAN 6 INSTEAD 21 PAGES MEERKAT SIMPLY USE BOTH SIDES OF THE PAGE AND REDUCE GAP ON PRINTING SIMPLE
Stop using our money to chauffeur the councillors about & cut costs in other areas
Take a pay cut
Tax second home owners if they can afford a second home they can pay double Council Tax.
That is entirely up to the Council. That is why they are being paid. Managers must manage.
That's your job to decide, no one elses. How about spending less on plants to make the place look nice for tourists? You seem to spend more on that than much needed services.
The link to the consultation document is not working
Tory councillors should take a 75% pay cut.
You are asking the most vulnerable and those on low incomes, or the many that WORK and do not meet thresholds to pay more....but still exist on the lowest level of incomes. You cannot stretch people any further... I would be more than happy to take more time to think about this and speak in person. We need to address our ageing population and lack of investment in post secondary education, to find ways to enable families to support their children without continually working extra hours for nothing. It is an absolute tragedy that working people are barely better off than on benefits....trying to show a decent example to the (very near) next tax payers (your

children)...although many will probably have to leave the island to achieve their success. It is unrealistic to ask people who have no actual knowledge of budgets, policy, and all the costs that contribute to our council tax, or indeed where it needs to be distributed.

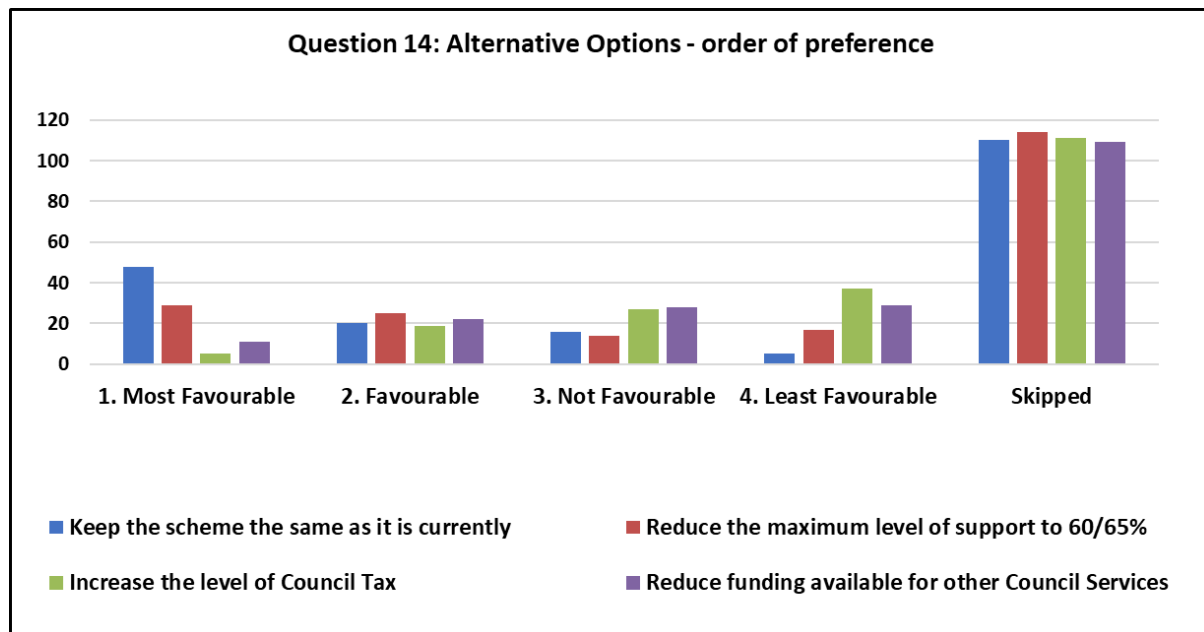
You employ people to answer this question. If they can't then perhaps save costs by firing them.

Question 14: If the Council were to choose these alternative options to make savings, what would be your order of preference? (please rank in order of preference, where 1 is the option that you would most prefer and 4 is the least, please enter a number in each box.)

The table and graph below detail the alternative options which the participants of the consultation found the most and least favourable, ranking from 1-4 where 1 is the alternative most preferred.

The table shows that 48 out of 199 participants (24%) stated their most preferred alternative was to keep the scheme as it is currently, and 37 respondents (19%) stated their least preferred alternative was to increase the level of Council Tax.

Order of preference	Keep the scheme the same as it is currently	Reduce the maximum level of support to 60/65%	Increase the level of Council Tax	Reduce funding available for other Council Services
1.	48	29	5	11
2.	20	25	19	22
3.	16	14	27	28
4.	5	17	37	29
Skipped	110	114	111	109



Question 15: If you have any further comments to make regarding the Local Council Tax Support scheme that you haven't had the opportunity to raise elsewhere, please use the space below.

Of the 199 participants, 35 provided further comments to Question 15:

<p>Any scheme should encourage self sufficiency and discourage relying on benefits for anyone who is capable of working.</p>
<p>apply as much of an individuals income as possible, including all universal credit - income is income, irrespective of what it is called and why or how it is obtained. total income -relates to ability to pay for council services, such as refuse collection - we all generate rubbish - elderly, disabled and unemployed as well as employed workers.</p>
<p>As above, I believe the council spends far too much money on administration.</p>
<p>As an OAP this document is far to complexed for me to fully understand. To save money decrease to payments made to councillors whom I think are paid far too much for their services, and stand for election for the money</p>
<p>As I have said before in previous comments, you can not keep on reducing the support to those people who are living on the breadline especially single adults who really struggle, pensioners have double the income & if on pension credit guarantee pay nothing, how is this fair!!!!</p>
<p>BE MORE HAND'S ON MULITY TASK AND IF YOU CAN LIKE MOST OF POPULLATION CUT OUT THE MDS n COE'S BRING BACK MATRONS</p>
<p>central gov. needs to live up to it's promises and ensure a fairer society. There are far too many tax avoidance loopholes and company shenanaigans</p>
<p>Easy to save us council tax payers money by taking actions I have listed above and claim back all the money wasted on the floating bridge</p>
<p>Everyone should pay council tax, 25% for single occupancy, discounts for pensioners, discounts for those with disabilities, everyone of working age that could work should pay the same as those that do.</p>
<p>Have you any idea how much people are struggling , Seriously you want to put even more strain on low income families ,I see first-hand how hard up families are . Rents have rocketed under private landlords and some housing is not fit for purpose . You need to start building real affordable housing ,low income families are in low paid job usually 16 hr contracts or zero hours ,this council has encouraged low priced supermarkets to open,thus providing these low paid low hours jobs ,fuelling the situation</p>
<p>I am disabled, I have no way of increasing my income to pay for a decrease in support. Where do you think I am going to find the money to pay for the shortfall? We don't get extra money in our Income Support to pay for Council Tax, we have to go without. When you reduced support down to 70% (and CT increased as well) our payments went up 56% from what we had been paying, as everyone elses CT went up by only 6% that means that those who had been getting the support were penalised for being disabled, vulnerable and poor. Meanwhile, the council increase the pay of their councillors, rewarding themselves for the fiasco that is the floating bridge! I am telling you now, we cannot afford to have any more support removed. If our CT bill goes up by more than working people because of this, you will end up having to take my disabled son into care because his parents will be in prison through non-payment. We have NO OPPORTUNITY to increase our income through work, so any proposal to decrease the support that we get now WILL BE</p>

DEVASTATING! I cannot stress this enough, WE CANNOT AFFORD IT! Why don't you start chasing those who can afford it, like 2nd home owners, let them pay more for a change!
Sick/disabled/vulnerable people in this country cannot take much more of this punishment, I am begging you, please don't hurt us anymore.

I 'live' in the work/UC/lcts process each month. UC payment & wages payments cause almost monthly changes. Staff always helpful. As an original UC trial person. took part time work. Pre UC part time work it could barley afford to live. UC/lcts & working does help. Its exhausting & constant worry. Reduce pension age and above moving here would help! Alternative holiday lets/second home/ctax payment options to increase income.

I think a £2 a week deduction for non-dependants isn't very much, and I think this could be increased. If a non-dependant is at home looking after children, then that family doesn't have to pay for childcare like working families do. And most of them will probably have access to the 2/3 year funding grants, enabling them to go out and work.

I think those that pay full council tax pay enough and should not be paying anymore to compensate for those who pay very little. Pensioners should not be protected they should be means tested - they have far too many benefits as it is.

Increase the council tax for people who can afford a second / holiday home. Any one who can afford a second / holiday home can afford to contribute a little more to the well being of society.

Keep reducing support for vulnerable adults is not the answer

No

No

no comment

none

None.

People already severely struggle to pay. I have gone without food or paying utility's numerous times along with my child in order to pay as is classed as a priority along with others. Increasing or reducing help will push people over the edge. There is already a growing contempt and movement against the council seeing wages and services we see. History of uprisings should teach you something when the poor have had enough.

People are struggling with cuts to services as it is so any further will have a severe detrimental effect

People who claim Council Tax support are usually those in our society who are least able pay it. To jiggle money from the least in our society is not the way to go about saving money. I would suggest looking at the pay structure of those at the very top of the tree and start by reducing them to a more fair level before you hit the poorest in society. Managers must learn to manage.

Services have been cut but my payment keeps going up. My esa has not increased therefore i am worse of.

SOME PEOPLE ON THEIOW ,DUE TO ILLNESS CANNOT WORK AND CANNOT AFFORD TO PAY COUNCIL TAX AND EAT ,KEEP WARM AND PAY OTHER BILLS CONSIDER THEM U HEARTLESS

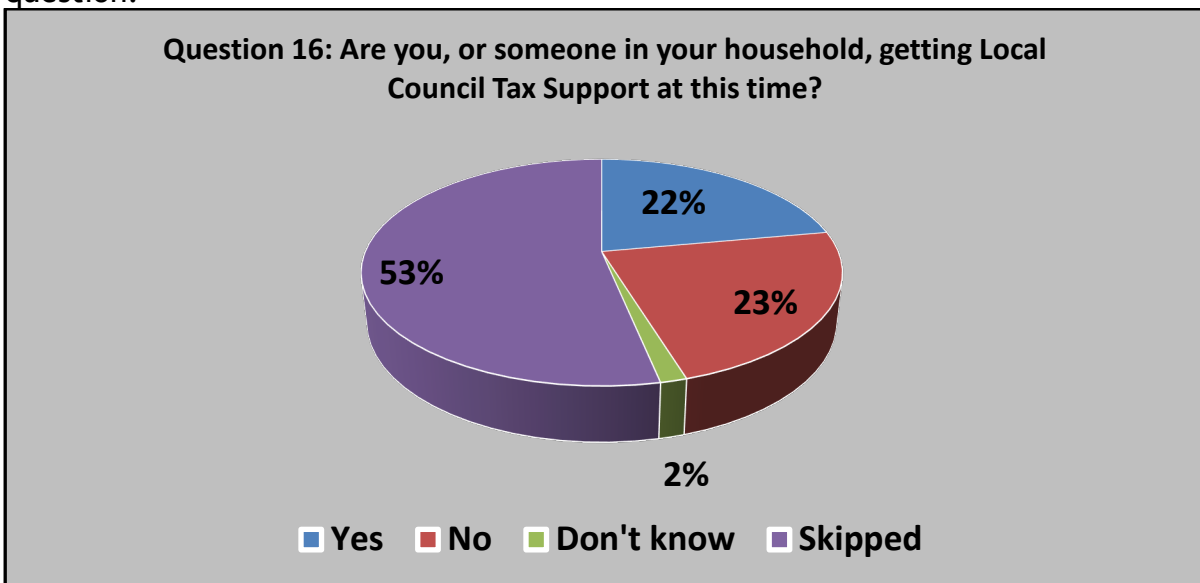
NB. Redacted for unsuitable language

Standard rate for non dep deductions. People can have large amounts of income and still pay a nominal amoun towards council tax. We all use the same services.

Stop paying ridiculous amounts of Council Tax payers money to consultants. Stop paying vast amounts of CT payers money to Councillors - let them have their meeting at the council offices and not in the pub or restaurant so they can claim the cost of a meal etc.
Stop raising council tax and support people are struggling more than the council!
The link to the consultation document is not working
The priority must be to protect people with no income to pay council tax. Seriously ill people with £20 a week universal credit a week (left after paying rent) should not be paying council tax at 20%, 30%, or any amount. Ultimately the enforcement possibilities combined with vulnerable people's circumstances risk causing breaches of their Article 3 rights, and the council must do... more to require centralised proper funding for its services from general taxation in addition to these options.
There is a problem if people get less housing support because they may become homeless or unable to meet other bills and be cold and hungry. So it is more important to prevent this happening in the first place because it will increase the demands on other services.
This whole questionnaire is worded in a way that makes it clear that you've decided on what to do, you just want us to agree. Either way, we end up paying more for less, don't we?
Use some of the reserves to reduce the amount of savings required. Reduce overheads like any other business
You have made this survey complicated and hard to understand and many of the people affected will not have access or understand much of it.

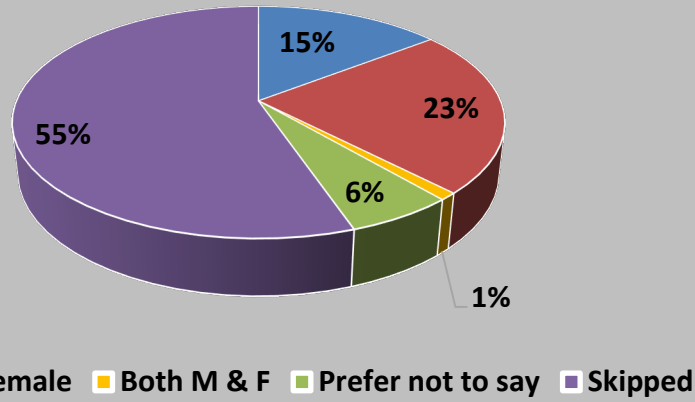
Question 16: Are you, or someone in your household, getting Local Council Tax Support at this time?

Of the total 199 respondents, 44 answered 'Yes' to this question which represents 22%, and 46 participants (23%) answered 'No'. 3 participants (2%) did not know whether they are getting Local Council Tax Support at this time, and 106 respondents (53%) skipped this question.

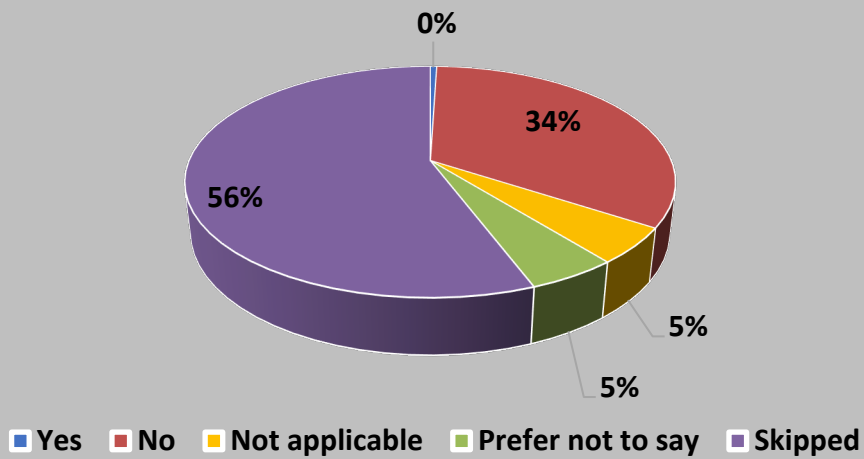


Equality Monitoring Questions

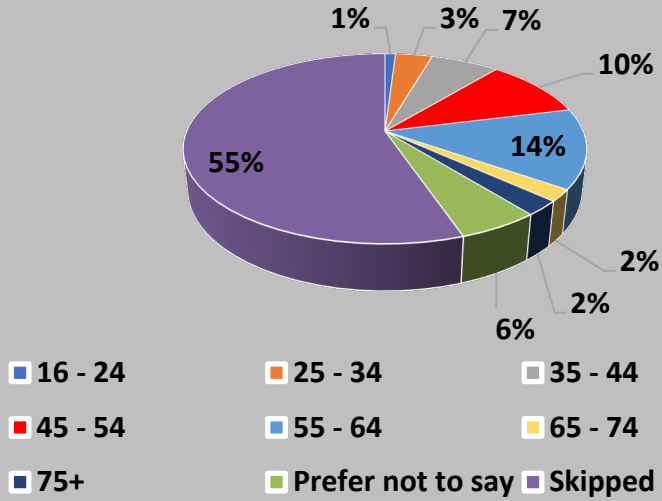
Which of the following options best describes how you think of yourself?



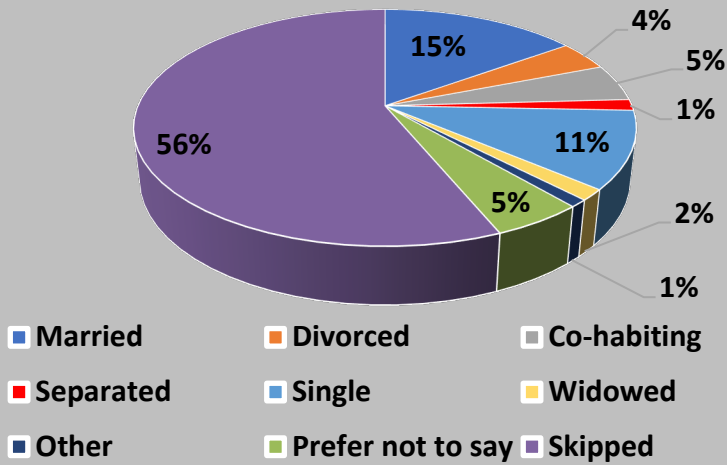
Are you currently pregnant or have recently given birth?



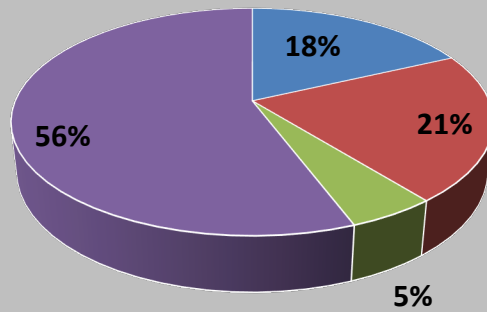
Which of these age groups do you belong to?



What is your marital status?

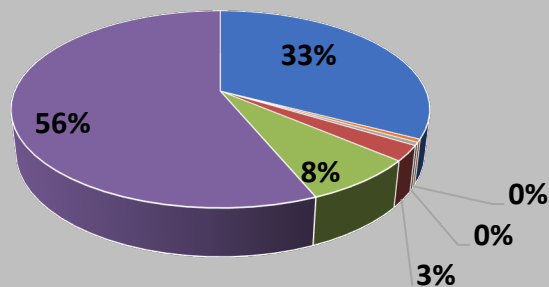


Please tell us if you consider yourself to have a disability, or a long-term illness, physical or mental health conditions



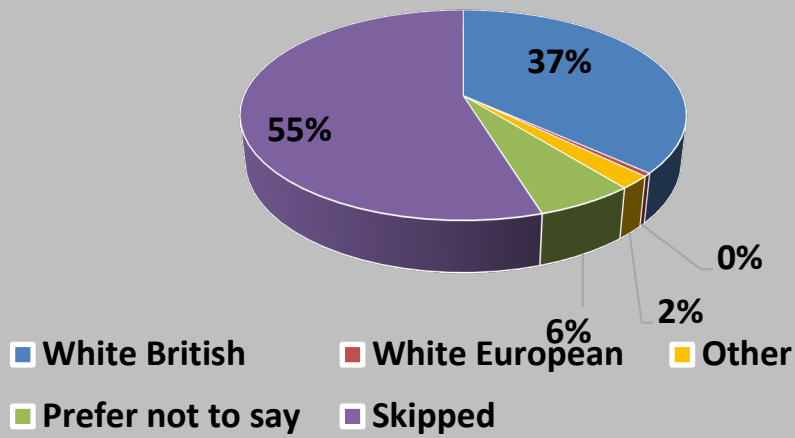
■ Yes ■ No ■ Prefer not to say ■ Skipped

Which of the following options best describes how you think of yourself?



■ Heterosexual ■ Bisexual ■ Homosexual
■ Other ■ Prefer not to say ■ Skipped

How would you describe your ethnic group?



Do you have a religious belief?

