

Appendix 2

Local Restrictions Support Grant: Discretionary Policy: Draft

Government Guidance

The Council is required to have in place a local discretionary scheme to support those affected by required closure but not on the Business Rates list. The discretionary payments may total 5% of the payments made to eligible businesses on the Business Rates list. The key elements required of the discretionary scheme are:

- i. Businesses required to close by regulation
- ii. other businesses that may have no choice but to close, e.g. because their customer's businesses are closed; because essential suppliers are closed
- iii. Payments apply for each three week qualifying period
- iv. Payments made will be up to and including £1,500 in each qualifying period
- v. One grant will be paid per business not business property
- vi. The Council may pay the same or different businesses in each qualifying period
- vii. The guidance provides the examples of micro-businesses with fixed costs and businesses crucial to the local economy, number of employees, whether they are closed and if open the extent to which trade is down, scale of drop on revenue
- viii. The Council may use an application process
- ix. The Local Authority must call or write to the business, stating that by accepting the grant payment, the business confirms that they are eligible for the grant scheme, including that any payments accepted will comply with State aid requirements.
- xi. The Council is required to use its discretion in identifying the right business owner to receive this funding, based on its application process.

Details of Draft Scheme

The discretionary scheme for Brent will work as follows:

- i. Businesses wishing to apply must do so using the on-line application process to be provided
- ii. Where the business occupies a commercial property, or part of a property, with a rateable value or annual mortgage/rent payments of less than £51,000 per annum

- iii. Businesses operating from domestic properties are not excluded
- iv. Number of employees: a headcount of staff shall be no more than 5
- v. Applications must be made no later than 14 days after the end of each qualifying period
- vi. An application is required for each qualifying period
- vii. Businesses must provide evidence that they have closed in accordance with regulations, or if not closed how their business has been affected, in particular by providing evidence of changes in revenue:
 - a. for the first two weeks of the qualifying period and for the first two weeks of each qualifying period
 - b. This will done by evidencing changes to the payments into the bank account of the business or person affected for those two weeks compared to the previous four weeks
 - c. Where a business states that it is cash and does not have regular income to its bank it will not qualify, as the Council will be unable to verify loss of revenue.
 - d. Businesses forced to close by regulation will not have to evidence losses
- viii. Where a business can, evidence of revenue falling by at least 75% a grant may be made of £500 per week for a sole trader, £1,000 where there are two employees and £1,500 where there are 3 or more employees.
- ix. The Council will check the declaration and use all resources available to do so

Evidence checking

The grant scheme will be administered via an online form. This online form is specific to the Council and will be built in-house. It will have functionality to allow document upload in order that businesses provide required evidence that they meet the specified criteria.

- i. Businesses will need to demonstrate that they meet the eligibility criteria. The evidence that will be requested is likely to include:
 - a) Bank account statements;
 - b) Lease/tenancy agreements;
 - c) Evidence of fixed property costs e.g. utilities bills;
 - d) Certificate of incorporation.

- ii. Awards will not be made without sufficient evidence that the criteria are being met.

Administration

Given the limited funding available to the Council the scheme will operate on a first come first service basis backed, where feasible, by clear and consistent promotion of the scheme in advance of any local restrictions being authorised.

Communication

Clear communication around the scheme and its criteria will be crucial to demonstrate transparency around how decisions are to be made. The Employment, Skills, and Enterprise team will work closely with Communications to ensure that the scheme is publicised widely in advance of it opening. The following channels will be used:

- i. Business e-newsletter with over 7,000 subscribers
- ii. Direct email notification to every business who has enquired about the scheme to date
- iii. Press release and council website updates
- iv. Social media channels
- v. Dissemination through key partners e.g. FSB and West London Business

This communication work will commence ahead of the scheme going live to ensure that as many businesses as possible are made aware and can start gathering the necessary evidence ahead of applications opening.

Assessment of applications

Applications will be considered by a dedicated review team with a recommendation made to a senior officer for approval. The process will be to review the information disclosed in the application and confirm the evidence provided supports the disclosures.

Once initial checks have been made to verify whether an applicant is eligible, those who do not meet all the criteria will be rejected and notified. Those who do meet all the criteria will be referred for

- i. further fraud and bank verification checks to ensure the data provided by businesses is accurate
- ii. Supplier set ups in Oracle to facilitate payments by BACS

Internal Audit will take a sample of completed applications and review each step of the process for accuracy and completeness. They will not be part of the approval process for each application.

Any award will be at the absolute discretion of the following:

- i. Head of Revenue and Debt
- ii. Head of Finance

Any representation regarding the appropriate administration of the Local Authority Discretionary Grants Scheme that cannot be resolved by the above will be referred to the Chief Executive or Director of Finance for determination.

There is no appeal mechanism but applicants can utilise the Council's complaint process if required.

Combatting fraud

In order to ensure that Local Authority Discretionary Grants Scheme is not subject to potential abuse, all submitted applications will require a statutory declaration of truth, a statement regarding data processing and a recovery of funds statement. This declaration allows for the council, through the corporate Anti-Fraud team, to carry out pre-payment checks in order to give greater assurance that the funds are being claimed correctly. Furthermore, the declaration carries warnings which further allow the council to consider taking criminal action against persons who have been found to have deliberately made false applications for the funding. It also allows for the recovery of funds which have been paid which should not have been.

Self Isolation payments



Briefing and QA for
Local Authorities on c