



Urgent Key Decision 14 October 2021

Report from the Strategic Director of Customer and Digital Services

Household Support Fund (06 October 2021 to 31 March 2022)

Wards Affected:	All
Key or Non-Key Decision:	Key Decision
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
No. of Appendices:	Three Appendix 1 DRAFT Letter from Clare Elliott regarding the Household Support Fund including draft allocations and grant determination criteria Appendix 2 DRAFT Household Support Fund Grant determination letter Appendix 3 DRAFT Household Support Fund guidance
Background Papers¹:	None
Contact Officer(s): <small>(Name, Title, Contact Details)</small>	Thomas Cattermole, Director of Customer Access Email: Thomas.Cattermole@brent.gov.uk Tel: 020 8937 5446

1.0 Purpose of the Report

- 1.1 To note the Government announcement regarding the Household Support Fund (HSF) and to agree proposals for the allocation and distribution of the HSF.

2.0 Recommendations

- 2.1 To note that Brent's indicative allocation for the Household Support Fund (HSF) is £2,781,222.28
- 2.2 To approve the proposed approach for allocating and distributing the HSF as set out in paragraphs 3.10 to 3.21 of the report.
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- 2.3 To approve the proposed approach whereby the Strategic Director of Customer and Digital Services in consultation with the Deputy Leader of the Council will establish such detailed criteria as may be necessary to enable appropriate allocation of funding in accordance with Recommendation 2.2 above and thereafter amend the eligibility criteria during the life time of this scheme if necessary for the reasons detailed in paragraph 3.22.

3.0 **Detail**

Details of the Scheme

- 3.1 On the 6th October 2021, The DWP confirmed that a new £500 million Household Support Fund (HSF) grant will be made available to all Local Authorities in England. This new grant will run from the 6th October 2021 to the 31st March 2022.
- 3.2 The aim is to give vulnerable households peace of mind this winter during the final stages of COVID economic recovery by providing extra funds to alleviate food poverty and to support them with their energy, water bills and other essentials. Brent's indicative allocation for the fund is £2,781,222.28 though this isn't likely to change.
- 3.3 Similar to the COVID Winter Support Grant and COVID Local Support grant which ran between 1 December 2020 and 30 September 2021, Local Authorities have been given flexibility to identify those at need and have been asked to use the data and information at their disposal in order to do this. There must be a clear rationale or documented policy/framework outlining our approach including how we are defining eligibility and how households access the scheme. Furthermore, Authorities have access to DWP's Searchlight portal and can use information relating to Universal Credit claims to aid the identification of households at need.
- 3.4 Although Authorities have the local ties and knowledge making them best placed to identify and help those most in need, they are also encouraged to work with partners such as voluntary organisations to ensure that the needs of vulnerable families are being met.
- 3.5 The funds must be used, or committed be, by 31st March 2022. The DWP has advised that the scheme can be delivered through a variety of routes such as providing vouchers, bank transfers, making direct provision of food or issuing grants to third parties. Whatever the chosen payment method the risks associated should be evaluated, i.e. risk of fraud.
- 3.6 The scheme should be used to primarily fund food provision and direct assistance with energy bills. The Council also has discretion to assess what is reasonable to assist those in genuine need this winter. Examples of other eligible spends include:
- Essentials linked to energy and water (including sanitary products, warm clothing, soap, blankets, boiler service/repair, purchase of equipment

including fridges, freezers, ovens, etc.), in recognition that a range of costs may arise which directly affect a household's ability to afford or access food, energy and water.

- Wider essentials (including, but not limited to, support with other bills including broadband or phone bills, clothing, and essential transport-related costs such as repairing a car, buying a bicycle or paying for fuel).
- Housing costs where existing housing support schemes do not meet this exceptional need (Authorities must first establish whether other forms of support are available to the household). Importantly, the fund should not be used to provide housing support on an ongoing basis or to support unsustainable tenancies.
- Support for historic rent arrears (which are built up prior to an existing benefit claim for households already in receipt of Universal Credit and Housing Benefit). However, support with rent arrears is not the primary intent of the fund and should not be the focus of spend.

3.7 There is no requirement for the Council to undertake a means test or conduct benefit checks unless this specifically forms part of the Authority's local eligibility criteria. Awards must be based on the following framework:

- At least 50% of the grant has to be allocated to households containing a person who will be under the age of 19 as of 31st March 2022, or households containing a person aged 19 or over of whom a child-related benefit is paid or free school meals are provided during the grant period.
- Up to 50% of the grant can be used to assist other vulnerable households who do not meet the criteria outlined above. This category includes households that contain a person aged 19 to 25 with special educational needs and disability (SEND), and/or care leavers.

3.8 Authorities should consider household circumstances when making a decision to spend this grant. Households may be receiving other forms of support, and this should be taken into account to avoid duplicating provision where possible. However, families receiving other forms of assistance are not excluded from receiving support through this grant.

3.9 Authorities can also provide support to an individual regardless of their immigration status, if there is a genuine care need that does not arise solely from destitution, such as:

- They have serious health problems
- There is a risk to a child's wellbeing

Proposed approach for Brent

Supermarket vouchers over the school holiday periods

- 3.10 It is proposed that the Council provides a £25 supermarket voucher per eligible child or young person for each week of the October half term, Christmas break, February half term, and Easter school break.
- 3.11 This amount would include £15 to spend on food, and an additional payment of £10 to contribute to the cost of other household essentials that can be purchased from supermarkets. This approach will minimise administrative costs and enable the Council to maximise the amount of grant funds made available to vulnerable families.
- 3.12 Eligible children and young people will include:
- All children in receipt of benefits related free school meals and other vulnerable families identified by the schools
 - Vulnerable families with pre-school aged children
 - Looked after children in semi-independent provision, care leavers, and their children

The Council will use the same mechanisms used for the COVID Winter Support grant and COVID Local Support grant to distribute the funds:

- The Edenred platform for children in receipt of benefits related free school meals and other vulnerable families identified by the schools
- Vouchers to parents with pre-school children
- Direct payments to eligible looked after children and care leavers

Residents applying via an applications processes

- 3.13 We anticipate that a large proportion of residents eligible for support through the HSF will be receive support through the distribution routes over the school holiday period. However, for those that are not automatically identified as eligible for support through these routes, the council will set aside a proportion of the fund to be accessed via an applications process.
- 3.14 The application process will be proactively promoted within service areas to distribute the funds, in particular vulnerable residents who access services through Adult Social Care and Housing will be targeted to apply for support. Similarly, those residents on Universal Credit will be identified through a targeted communications campaign. Unlike previous grants, this application process will be open to those who have no recourse to public funds.

Food bank support

- 3.15 A proportion of the fund has been allocated to provide grant funding to Brent food banks to support them to respond to the anticipated increased demand for food aid over the winter period.

- 3.16 Food banks have received funding from the COVID Local Support Grant to provide food aid until 31 December 2021. Officers are exploring the best mechanism to issue funds from the HSF to Food banks beyond this period. This would likely be a grant application process.

Care Leavers' accommodation costs

- 3.17 To support Care Leavers who remain in semi-independent placements with accommodation costs, as they cannot move into Council housing.

Resident Support Fund

- 3.18 A proportion of the HSF will be used to support residents who apply for funds to support with food, energy and water, or wider essential (i.e. white goods) through Brent's own Resident Support Fund.
- 3.19 Existing mechanisms will be utilised to distribute the funds.

Reactive support via Brent Hubs, Customer Access and Family Wellbeing Centres

- 3.20 A small proportion of the grant will be used to provide ongoing reactive provision in the form of supermarket and fuel vouchers to residents who approach Brent Hubs, Customer Access Service Centre or Family Wellbeing Centres for additional support.
- 3.21 Table 1 provides a breakdown of the proposed spend for each of the proposals outlined in paragraphs 3.10 to 3.20.

Table 1

Description of Spend	Grant allocation £'s
Supermarket vouchers over the October half term, Christmas, February half term, and Easter school holiday periods	1,888,900
Residents applying via an applications processes	535,000
Food bank support	200,000
Care Leavers' accommodation costs	100,000
Resident Support Fund	50,000
Reactive support via Brent Hubs and Customer Access	6,930
Total	2,780,830

4.0 Financial Implications

- 4.1 The council's indicative allocation from the fund is £2,781,222.28, which has to be used between the 6th October 2021 and the 31st March 2022. The aim of this funding is to give vulnerable households peace of mind this winter during the final stages of COVID economic recovery by providing extra funds to alleviate food poverty and to support them with their energy, water bills and other essentials.
- 4.2 The planned spend shown in Table 1 above is within the grant allocation, so there is no risk to the Council. It is a requirement of the grant conditions to submit regular claims of any costs incurred which will be reimbursed provided they are within the permitted spend in the guidance. Any unspent funds from this allocation will not be claimed, so there will no requirement to refund any monies to the DWP.

5.0 Legal Implications

- 5.1 The funding provided under the HSF is required to be distributed by the 31st March 2022 to support those most in need with the cost of food, energy, water bills and other essentials. The HSF funding must only be used to provide support as defined within the grant conditions. To this end the Council is required to develop a local eligibility framework and approach. Officers have set out a proposed approach in paragraphs 3.10 – 3.21 of the report and will seek authority to establish such detailed criteria as may be necessary to enable appropriate allocation of funding.
- 5.2 The HSF runs from the 6th October 2021 and funds must be used or committed by the 31st March 2022. Given the value of the HSF allocation to Brent (£2,781,222.28) decisions regarding its distribution and the establishment of eligibility criteria for its distribution will be classed as a key decision. Should Officers need to implement the establishment of eligibility criteria and distribution of funding without placing the matter on the Forward Plan for the requisite 28 day period, the use of the urgency process under the Constitution will be necessary.
- 5.3 Officers will need to have regard to the Subsidy Control regime in relation to any arrangements entered into for the distribution of the HSF.

6.0 Equality Implications

- 6.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 6.2 Having due regard involves the need to enquire into whether and how a

proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

- 6.3 There is a requirement to consider how the Household Support Fund impacts those with characteristics protected under the Equality Act 2010. There is no prescribed manner in which the council must exercise its public sector equality duty but having an adequate evidence base for its decision is necessary.
- 6.4 Due to the urgency of the situation, formal assessments have not been undertaken in respect of the decisions which are the subject of this report. Such formal assessments are not a requirement of the duty. An underlying purpose of the recommended decisions is to have regard to the protection of those with protected characteristics e.g. children eligible for free school meals and families with pre-school children eligible for benefits. The proposed approach for allocating and distributing the funding recommended for adoption however, seeks to provide funding to a wide range of vulnerable households. In the circumstances, Officers do not consider that there are any adverse equalities impacts but Officers will keep the equalities impact of the decisions under review.

7.0 Consultation with Ward Members and Stakeholders

- 7.1 It is not considered in the circumstances that non-statutory public consultation is a viable or reasonable option for the Council in taking the decisions which are the subject of this report, even if at other times it would have considered consultation with the public and / or stakeholders affected by the decision.

8.0 Human Resources/Property Implications (if appropriate)

- 8.1 It is not considered at this time that there are any Human Resources/Property/Environmental Sustainability Implications arising from decisions which are the subject of this report.

Report sign off:

Peter Gadsdon

Strategic Director Customer Service & Digital Access