

	<b>Officer Key Decision</b> 14 April 2022
	<b>Report to the Strategic Director of Customer and Digital Services</b>
<b>Household Support Fund extension (from 1 April 2022 until 30 September 2022)</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	1. DRAFT Launch letter for the Household Support Fund extension including draft allocations and grant determination criteria 2. DRAFT Household Support Fund Grant determination letter 3. DRAFT Household Support Fund guidance
<b>Background Papers:</b>	None
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## 1.0 Purpose of the Report

- 1.1 This report seeks approval for the emergency allocation and distribution of the Household Support Fund extension, which runs from 1 April 2022 to 30 September 2022.

## 2.0 Recommendation(s)

That the Strategic Director for Customer and Digital Services:

- 2.1 Notes that Brent's indicative allocation for the Household Support Fund (HSF) for the period 1 April 2022 to 30 September 2022 is £2,781,222.28.
- 2.2 Approves the proposed approach for allocating and distributing the HSF as set out in paragraphs 3.10 to 4.16 of the report.
- 2.3 Approves the proposed approach whereby the Strategic Director of Customer and Digital Services in consultation with the Deputy Leader of the Council will exercise his authority to establish detailed eligibility criteria regarding the Household Support Fund grant scheme as may be necessary to enable appropriate allocation of funding in accordance with Recommendation 2.2 above.
- 2.4 Approves the proposed approach whereby the Strategic Director of Customer and Digital Services in consultation with the Deputy Leader of the Council has the authority to amend the Council's eligibility criteria during the life time of this Household Support Fund grant scheme if necessary for the reasons detailed in paragraph 3.6, subject to the parameters set by the Department for Work and Pensions in its Determination and Guidance.

### **3.0 Detail**

- 3.1 On 6 October 2021, The DWP confirmed that a new £500 million Household Support Fund (HSF) grant would be made available to all Local Authorities in England. This grant initially ran from 6 October 2021 to 31 March 2022. The Council cannot carry over the HSF grant fund monies provided by the DWP for the period between October 2021 and March 2022 into the financial year starting in April 2022.
- 3.2 The HSF is now being extended from 1 April 2022 to 30 September 2022, with £421 million available to Local Authorities in England for that extended period.
- 3.3 The aim is to support those most in need to help with significantly rising living costs 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 is not likely to change.
- 3.4 At least one third of the total funding must be spent on families with children and at least one third must be spent on pensioners. In terms of type of support, the expectation is that the HSF extension should be used in a similar way as the original HSF scheme, with a greater emphasis on supporting households with energy bills. Food and water bills also remain priorities.
- 3.5 In exceptional cases of genuine emergency it can additionally be used to support housing costs where existing housing support schemes do not meet this exceptional need.
- 3.6 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. The eligibility criteria is outlined in Section 4 of this report as part of the proposed approach for Brent.

- 3.7 Local Authorities are also encouraged to work with partners such as voluntary organisations to ensure that the needs of vulnerable families are being met.
- 3.8 The funds must be used, or committed to by 30 September 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.
- 3.9 The scheme should be used to primarily fund food provision and direct assistance with energy bills. The Council has discretion to assess what is reasonable to assist those in genuine need this spring. 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. The Fund cannot be used to provide mortgage support, though homeowners could still qualify for the other elements of the Fund.
  - 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.
- 3.10 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 33.3% of the grant has to be allocated to households containing a person who will be under the age of 19 as of 30<sup>th</sup> September 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. Where an eligible child lives on his or her own, they are a household that

includes a child covered in the one third allocation for households with children.

- At least 33.3% of the grant has to be allocated to support households that include a person who has reached state pension age by 30<sup>th</sup> September 2022.

- A maximum of 33.3% of the grant has to be allocated to other vulnerable households who do not meet the criteria outlined above. These are residents between the age of 18 and pension age. This category also includes households that contain a person aged 19 to 25 with special educational needs and disability (SEND), and/or care leavers.

3.11 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.

3.12 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

## **4 Proposed approach for Brent**

### ***Families with Children***

4.0 It is proposed that the Council provides a £10 supermarket voucher per eligible child or young person for each week of the May half term and the Summer school holidays. For a cohort of approximately 12,560 children a £10 voucher per child for 7 weeks of school holidays is estimated to cost £879,200.

4.1 Previously the HSF grant distributed by the Council allocated £25 per eligible child per week. This amount included £15 to spend on food and £10 to cover additional winter costs incurred. Household essentials purchased could be from supermarkets.

4.2 Officers have calculated that it would cost an additional £439,600 to issue £15 vouchers per week for each eligible child. It would cost an additional £1,318,800 to issue £25 vouchers per week for each eligible child.

4.3 Unlike previously, the extension of the HSF includes a minimum requirement for a third of the funding to be spent on pensioners. This suggests that the policy intention is for Local Authorities to make less of a contribution to supermarket vouchers over the school holiday period.

4.4 Officers will ensure there is clear communication with schools to inform parents about the change in amount for voucher support.

4.5 In addition to the support from vouchers, families with children are also eligible to apply for Resident Support Fund (RSF), and Brent's Digital Support Fund. Families will also be supported by the Council Tax rebate for Bands A-D and can apply via the discretionary scheme for housing support for properties in Bands E-H. Families with children can also benefit from the Holiday Activities and Food Programme which is an additional grant for Local Authorities administered by the Department for Education to make free places at holiday clubs available in the Easter, summer and Christmas holidays in 2022. The holiday clubs provide activities and a free meal for children eligible for benefits related to free school meals.

4.6 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 previous allocation of the HSF 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

### ***Pensioners***

4.7 At least one third of the grant allocation (approx. £900k) has to be spent on providing support to pensioners.

4.8 It is proposed that the Council provides a £120 one off payment to approximately 7,500 Pensioner Households to help with the rising cost of food and energy bills. Officers identified this cohort of pensioner residents who are already in receipt of Council Tax Support but are on low income/ pension and hence qualify for Council Tax Support.

4.9 The payment will be distributed using Pre-paid Financial Services (PFS), the same mechanism used for RSF payments.

4.10 Officers will engage with third sector organisations such as Age UK, Citizens Advice Brent and the Pensioners Forum to raise awareness about the support available. These organisations can also identify pensioners who could benefit from additional support from the Resident Support Fund or other schemes.

### ***Other households***

#### ***Resident Support Fund***

- 4.11 At least one third of the grant allocation (approx. £900k) will be used to support residents who apply for funds to support with food, energy and water, or wider essentials (i.e. white goods) through Brent's own Resident Support Fund.
- 4.12 Existing mechanisms and eligibility criteria will be utilised to distribute the funds.

#### ***Family Wellbeing Centres***

- 4.13 Brent's Family Wellbeing Centres will continue to provide proactive support for residents.

#### ***Food Aid Organisations***

- 4.14 A proportion of the grant will be ring fenced to support food aid organisations via existing grant agreements. It is currently estimated that £100k will be contributed from the 'Other Households' third of the HSF funding.

#### ***Reactive support via Brent Hubs and Customer Access***

- 4.15 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 or the Customer Access Service Centre for additional support.
- 4.16 Table 1 provides a breakdown of the proposed spend for each of the proposals outlined in paragraphs 4.0 to 4.16.

**Table 1**

<b>Description of Spend</b>	<b>Grant allocation</b>
	<b>£</b>
<b>Families with Children</b> - supermarket vouchers over the May half term and Summer break	900,000.00
<b>Pensioners</b> – one off payment to pensioner housing benefit households	900,000.00
<b>All households</b> – top up the Resident Support Fund, and provide ongoing reactive food, fuel support via Brent Hubs and Customer Access	881,222.28

<b>Food aid organisations</b> – extension of the existing food aid grants	100,000.00
<b>Total</b>	<b>2,781,222.28</b>

## 5.0 Financial Implications

- 5.1 The Council's indicative allocation from the fund is £2,781,222.28, which has to be used between 1 April and 30 September 2022. The aim of this funding is to give vulnerable households peace of mind this spring and summer by providing extra funds to alleviate food poverty and to support them with their energy, water bills and other essentials.
- 5.2 The planned spend shown in Table 1 at paragraph 4.16 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.

## 6.0 Legal Implications

- 6.1 The funding provided under the HSF is required to be distributed by 30 September 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 as set out by the Department for Work and Pensions. To this end the Council is required to develop a local eligibility framework and approach. As stated above, HSF funding was previously provided for the period between October 2021 to March 2022, and has been extended from 1 April 2022 to 30 September 2022. Officers have set out a proposed approach in paragraphs 3.10 – 4.16 of the report and will seek authority from the Strategic Director for Customer and Digital Services in consultation with the Deputy Leader to establish such detailed criteria as may be necessary to enable appropriate allocation of funding.
- 6.2 The extended HSF funding runs from the 1 April 2022 to 30 September 2022 and funds must be used or committed by 30 September 2022. Given the value of the HSF allocation to Brent (in the sum of £2,781,222.28) for 2022/23, decisions by the Strategic Director for Digital and Customer Services regarding its distribution and the establishment of eligibility criteria for its distribution will be classed as a key decision.
- 6.3 Officers will need to have regard to the Subsidy Control regime in relation to any arrangements entered into for the distribution of the HSF.

## 7.0 Equality Implications

- 7.1 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.
- 7.2 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.
- 7.3 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.
- 7.4 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.

## **8.0 Consultation with Ward Members and Stakeholders**

- 8.1 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, on account of the very short period which the government has given local authorities regarding the extension of the Household Support Fund grant scheme even if at other times it would have considered consultation with the public and / or stakeholders affected by the decision.

## **9.0 Human Resources/Property Implications**



- 9.1 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 FOR CUSTOMER AND  
DIGITAL SERVICES*