### HAMPSHIRE COUNTY COUNCIL

### **Decision Report**

| Decision Maker: Executive Lead Member for Children's Services |  |
|---|--|
| Date:   | 7 July 2021  |
| Title:  | COVID Local Support Grants: June 2021 – September 2021 |
| Report From:  | Director of Children's Services                        |

Contact name: Suzanne Smith, Assistant Director, Children's Services

Tel: 07793 759047 Email: Suzanne.smith2@hants.gov.uk

### **Purpose of this Report**

- 1. The purpose of this report is to outline the proposed approach to distributing £2,728,189.85 in Covid related funding from the Department for Work and Pensions under the Covid Local Support Grant scheme.
- 2. This report seeks approval from the Executive Lead Member for Children's Services for spend and grant funding to organisations in support of vulnerable households between 21 June 2021 and 30 September 2021.

# Recommendation(s)

- 3. It is recommended that the Executive Lead Member for Children's Services approves the grant of £1,900,320 funding to schools for them to purchase and provide one £60 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all children eligible for free school meals and additionally all children with a social worker, all children open to early help.
- 4. It is recommended that the Executive Lead Member for Children's Services approves the grant of £424,500 funding to early years and post 16 education establishments for them to purchase and provide one £75 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all 16-18 year olds previously eligible for FSM and all 2-4 year olds accessing childcare and eligible for Early Years Pupil Premium.

- 5. It is recommended that the Executive Lead Member for Children's Services approves the purchase of one £75 food or fuel voucher for each care leaver not forming part of the extended FSM cohort identified in paragraph 15, to the total value of up to £5,250.
- 6. It is recommended that a grant of up to £8,000 to be made to the Hampshire Young Carers Alliance such that vouchers and/or gifts and/or food can be provided to young carers not in receipt of vouchers through the free school meal voucher offer. Such grant will be provided on terms to be agreed by the Director of Children's Services and in accordance with the grant criteria set out in paragraph 12.
- 7. It is recommended that the Executive Lead Member for Children's Services delegates authority to the Director of Children's Services to approve community grant awards to organisations delivering services that meet the criteria of the grant (as set out in paragraph 12) for targeted financial support for those in need in consultation with the Executive Lead Member up to the total value of £200,000.
- 8. It is recommended that a grant of £112,000 is made available to Citizens Advice for them to use to financially support households with fuel bills over the summer period. Such grant will be provided on terms to be agreed by the Director of Children's Services and in accordance with the grant criteria set out in paragraph 12.
- 9. It is recommended that the Executive Lead Member for Children's Services delegates approval to the Director of Children's Services to approve the reallocation of any COVID Local Support Grants remaining or underspent funds to organisations delivering services that meet the criteria of the grant set out in paragraph 12 in consultation with the Executive Lead Member.

### Contextual Information

- 10. On 21 June 2021, the Government announced an extension to the COVID grant support for vulnerable families. A further £160 million of support has been made available to local authorities to support those most in need across England with the cost of food, energy and water bills and other associated costs.
- 11. This funding builds on the previous Covid Winter Grant administered by the Department for Work and Pension, and Hampshire County Council's funding under this grant totals £2,728,189.85, to be spent by 30 September 2021.
- 12. The conditions of the COVID Local Support Grant are the same as those that applied to the Covid Winter grant, i.e.:

- at least 80% of the total funding will be ring-fenced to support families with children, with up to 20% of the total funding allocated for other types of households, including individuals.
- at least 80% of the total funding will be ring-fenced to provide support with food, energy and water bills (including sewerage), with up to 20% made available for other essential items.

### Hampshire's Approach

- 13. Following Hampshire County Council's successful connect4communities programme, funded by the DWP Covid Winter Grant, there is evidence of successful engagement with the community and voluntary sector as well as education settings.
- 14. Allocation of funding is therefore proposed to replicate some of the initiatives previously funded by the Covid Winter Grant and supported further by the Covid Local Support Grant issued between April and Jun 2021. This approach will allow rapid distribution of funding to those can make best use of it, supported by evidence of successful outcomes between December 2020 and June 2021.

#### Free school meal vouchers

- 15. It is recommended that the Executive Lead Member approves the grant of £1,900,320 funding to schools for them to purchase and provide one £60 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all children eligible for free school meals and additionally all children with a social worker, and all children open to early help. An estimated 31,672 children will be able to access vouchers as a result of this initiative.
- 16. Providing financial support to food costs through the issuing of vouchers is an effective way to reach a significant number of families across the County, in accordance with the DWP grant criteria that requires at least 80% of the funding to be used to support families with children.
- 17. In addition to vouchers funded by the Covid Local Support Grant, a range of other initiatives are in place to support families with children over the summer holiday period. These include:
  - a. Four weeks of Holiday Activity and Food schemes running across the County, funded by the Department for Education. These schemes will provide more than 53,000 free of charge places for free school meal eligible children to participate in fun and educational activities as well as receiving a meal for all children.
  - b. Since December 2020, 15 community pantries have been established across Hampshire. Community pantries work on the principle of giving

- those in need the opportunity to have a 'helping hand' by getting food at a lower rate on a weekly basis.
- c. At least 60 schools across Hampshire will be providing access to summer schools for children during the school holidays. Meals will be provided free of charge to children eligible for free school meals attending summer schools.
- d. Community grants issued supported by this funding will also benefit families with food and fuel poverty.
- 18. In addition to the Covid Winter Grant provided by DWP between December 2020 and May 2021, the Department for Health and Social Care's Healthy Start vouchers have been increased from £3.10 to £4.25 from April 2021. Healthy Start supports lower-income pregnant women and families with children under four to buy fruit, vegetables, pulses, milk and infant formula, providing an important nutritional safety net.
- 19. It is recommended that the Executive Lead Member approves the grant of £424,500 funding to early years and post 16 education establishments for them to purchase and provide one £75 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all 16-18 year olds previously eligible for FSM and all 2-4 year olds accessing childcare and eligible for Early Years Pupil Premium. Children and young people in this cohort are not eligible to access summer schools and Holiday Activity and Food provision, which is reflected in the higher value of voucher offered to these children. An estimated 5,660 children and young people will benefit from these vouchers.

### **Care Leavers**

20. It is recommended that the Executive Lead Member approves the purchase of one £75 food or fuel voucher for each care leaver not forming part of the extended FSM cohort identified in paragraph 18, to the total value of up to £5,250. An estimated 70 care leavers will receive these vouchers.

### **Young Carers**

21. Many young carers and their families will receive a voucher under the extended FSM criteria outlined in paragraph 15. However, there are an estimated 389 young carers who may not be picked up within this offer. It is therefore recommended that a grant of up to £8,000 to be made to the Hampshire Young Carers Alliance such that vouchers and/or gifts and/or food can be provided to young carers not in receipt of vouchers through the free school meal voucher offer.

# **Community Grants**

- 22. There are a significant number of agencies, notably voluntary and charitable sector providers and after school clubs, supporting vulnerable families, households, and individuals. There are also a number of organisations who wish to support their local community with food and fuel poverty, particularly in rural areas. It is proposed that a countywide grant fund is established where such organisations can apply for funding to expand or deliver support and services. Any funded support must meet the DWP grant criteria, as set out in paragraph 12, but use of such a grant fund will enable a flexible and responsive approach to addressing local needs as and when they are identified.
- 23. Education settings will also be able to apply to this grant fund to secure funds to support vulnerable families who do not necessarily meet the criteria for the free school meal vouchers.
- 24. It is recommended that the Executive Lead Member delegates authority to the Director of Children's Services to approve grant awards to organisations delivering services that meet the criteria of the grant (as set out in paragraph 12) for targeted financial support for those in need in consultation with the Executive Lead Member up to the total value of £200,000.

### Support for individuals

- 25. It is recommended that a grant of £112,000 is made available to Citizens Advice for them to use to financially support households with fuel bills over the summer period.
- 26. Following engagement with district councils and other key stakeholders, it is felt that targeting this funding at fuel bills will reduce the potential for double funding with other grants available and asking Citizens Advice to administer this fund will ensure that any financial support can be provided alongside broader support and advice. Citizens Advice are also well placed to undertake ID and benefits checks to mitigate the potential risks of fraudulent claims. Hampshire County Council, working with district councils, may require Citizens Advice to target specific communities where there is specific local need.

### **Administration Costs**

27. The COVID Local Support Grant funding allocation includes reasonable administration costs to enable local authorities to deliver the scheme and it is therefore permitted for Hampshire County Council (and partners) to deduct estimated administration costs from the total allocation to determine the

- amount remaining. Administration costs for each local authority will be published on www.gov.uk alongside detail of all spend related to this scheme.
- 28. Hampshire County Council is seeking to minimise administration costs and £50,000 has been set aside as a contribution to the staffing costs associated with allocating funding, grant agreements and oversight.

### **Finance**

29. A summary of the proposed funding across the initiatives to be delivered with the DWP Covid Local Support Grant is set out in table 1:

Table 1

| Connect4Communities – Hampshire's Covid Loca<br>Scheme   | l Support Grant    |
|--|--------------------|
| Component  | Funding Allocation |
| Meal Vouchers – School Aged Children<br>£60 per child for:<br>All FSM eligible children; plus<br>All children open to a social worker; plus<br>All children open to early help.                | £1,900,320         |
| Meal Vouchers<br>£75 per child for:<br>All post 16 students previously eligible for FSM; plus<br>All 2-4 year olds accessing childcare and eligible for<br>Early Years pupil premium children. | £424,500           |
| Care Leavers Vouchers  | £5,250             |
| Young Carers Grant   | £8,000             |
| Community Grants   | £200,000           |
| Citizens Advice Grants   | £112,000           |
| Administration of the Grant  | £50,000            |
| Total  | £2,700,070         |
| Grant available  | £2,728,189         |

### **Performance**

30. All funding granted to third party organisations (including schools, colleges and early years providers) will be supported by a grant agreement setting out the conditions of the funding as well as reporting requirements.

- 31. Third party organisations will be required to report to the County Council on how they have spent the funding provided, in line with the DWP grant criteria set out in paragraph 12.
- 32. Allocation of funding across the grant criteria set out in paragraph 12 will be monitored to ensure spend remains compliant with the terms of the grant.

### **Consultation and Equalities**

- 33. Consultation and engagement have been undertaken as part of developing and delivering the Covid Winter Grants programme.
- 34. School and colleges have previously been consulted regarding their preferred method of supporting children with food by way of a questionnaire.
- 35. An Equalities Impact Assessment has been completed and is included as Appendix 1 to this report.

### Climate Change

- 36. Hampshire County Council utilises two decision-making tools to assess the carbon emissions and resilience impacts of its projects and decisions. These tools provide a clear, robust, and transparent way of assessing how projects, policies and initiatives contribute towards the County Council's climate change targets of being carbon neutral and resilient to the impacts of a 2°Ctemperature rise by 2050. This process ensures that climate change considerations are built into everything the Authority does.
- 37. This decision is essentially strategic/administrative in nature and does not have any climate change considerations.

### Conclusions and Recommendations

- 38. It is recommended that the Executive Lead Member approves the grant of £1,900,320 funding to schools for them to purchase and provide one £60 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all children eligible for free school meals and additionally all children with a social worker, all children open to early help.
- 39. It is recommended that the Executive Lead Member approves the grant of £424,500 funding to early years and post 16 education establishments for them to purchase and provide one £75 food voucher per child for the summer holiday period, in accordance with the grant criteria set out in paragraph 12. Vouchers will be available for all 16-18 year olds previously eligible for FSM and all 2-4 year olds accessing childcare and eligible for Early Years Pupil

### Premium.

- 40. It is recommended that the Executive Lead Member approves the purchase of one £75 food or fuel voucher for each care leaver not forming part of the extended FSM cohort identified in paragraph 15, to the total value of up to £5,250.
- 41. It is recommended that a grant of up to £8,000 to be made to the Hampshire Young Carers Alliance such that vouchers and/or gifts and/or food can be provided to young carers not in receipt of vouchers through the free school meal voucher offer. Such grant will be provided on terms to be agreed by the Director of Children's Services and in accordance with the grant criteria set out in paragraph 12.
- 42. It is recommended that the Executive Lead Member delegates authority to the Director of Children's Services to approve community grant awards to organisations delivering services that meet the criteria of the grant (as set out in paragraph 12) for targeted financial support for those in need in consultation with the Executive Lead Member up to the total value of £200,000.
- 43. It is recommended that a grant of £112,000 is made available to Citizens Advice for them to use to financially support households with fuel bills over the winter period. Such grant will be provided on terms to be agreed by the Director of Children's Services and in accordance with the grant criteria set out in paragraph 12.
- 44. It is recommended that the Executive Lead Member delegates approval to the Director of Children's Services to approve the reallocation of any COVID Local Support Grants remaining or underspent funds to organisations delivering services that meet the criteria of the grant set out in paragraph 12 in consultation with the Executive Lead Member.

# REQUIRED CORPORATE AND LEGAL INFORMATION:

# Links to the Strategic Plan

| Hampshire maintains strong and sustainable economic growth and prosperity: | Yes |
|--|-----|
| People in Hampshire live safe, healthy and independent lives:              | Yes |
| People in Hampshire enjoy a rich and diverse environment:                  | no  |
| People in Hampshire enjoy being part of strong, inclusive communities:     | Yes |

# Other Significant Links

| Links to previous Member decisions:                           |                  |  |
|---|------------------|--|
| <u>Title</u>  | <u>Date</u>      |  |
| COVID Winter Grants   | 9 December 2020  |  |
| COVID Winter Grants – Holiday Activities and Community Grants | 2 February 2021  |  |
| HAF Grant Recommendations                                     | 22 February 2021 |  |
| HAF Grant Recommendations Summer 2021                         | 8 June 2021      |  |
|   |                  |  |
| Direct links to specific legislation or Government Directives |                  |  |
| <u>Title</u>  | <u>Date</u>      |  |
|   |                  |  |
|   |                  |  |
|   |                  |  |

# Section 100 D - Local Government Act 1972 - background documents

The following documents discuss facts or matters on which this report, or an important part of it, is based and have been relied upon to a material extent in the preparation of this report. (NB: the list excludes published works and any documents which disclose exempt or confidential information as defined in the Act.)

<u>Document</u> <u>Location</u>

None

### **EQUALITIES IMPACT ASSESSMENT:**

# 1. Equality Duty

The County Council has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act with regard to the protected characteristics as set out in section 4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation);
- Advance equality of opportunity between persons who share a relevant protected characteristic within section 149(7) of the Act (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and those who do not share it:
- Foster good relations between persons who share a relevant protected characteristic within section 149(7) of the Act (see above) and persons who do not share it.

Due regard in this context involves having due regard in particular to:

- The need to remove or minimise disadvantages suffered by persons sharing a relevant protected characteristic that are connected to that characteristic:
- Take steps to meet the needs of persons sharing a relevant protected characteristic that are different from the needs of persons who do not share it;
- Encourage persons sharing a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionally low.

### 2. Equalities Impact Assessment:

Equalities Impact Assessments have been completed for each project.

### Appendix 1 – Copy of Equalities Impact Assessment

Name of project or proposal (required): COVID Local Support Grant – June – September 2021

Is this project a Transformation project? (required): Neither

Name of accountable officer (required): Suzanne Smith

Email (required): suzanne.smith2@hants.gov.uk

**Department (required):** Children's Services

Date of assessment (required): 26/06/2021

Is this a detailed or overview EIA? (required): Overview

### Describe the current service or policy:

The DWP COVID Local Support Grant will provide £2,728,189.85 of funding to the Hampshire County Council to support those most in need, with costs of food, energy, water bills and essentials. The grant conditions state at least 80% must be used for food and fuel, and no more than 20% on other items. Also 80% of the fund must be spent on families with children and up to 20% on other households including individuals. A variety of initiatives have been identified working with education establishments and local community partners to ensure households who are most vulnerable have access to food and fuel this winter.

Geographical impact (required): All Hampshire

### Describe the proposed change:

The COVID Local Support Grant is aimed at vulnerable families, particularly those with children and will offer financial support with food and energy bills. Working with schools, colleges and early years providers, the proposed programme will deliver food vouchers and other financial support to a wide range of vulnerable families for school holiday period between 21 June and 30 September 2021. Through grant funding, the programme will also support the development and delivery of a range of other community led projects and activity and food schemes to meet local needs across the County.

Who does this impact assessment cover? (required): Service users

Has engagement or consultation been carried out? (required): Yes

# Describe the consultation or engagement you have performed or are intending to perform:

After notification, a task group formed with representatives from major stakeholder groups including the voluntary and charitable sector, Connect4Summer leads, Adult Health & Care, Local Children's Partnerships, Supporting Families, Children's Social Care, Early Years and Wraparound Childcare, County Supplies and Communications. A variety of other stakeholders have been consulted so

existing local provision and need could be identified and minimise risks in respect of funding duplication. Other consulted groups include head teacher groups, faith groups and local resilience centres/hubs. The engagement created the offers under a programme name of 'Connect4Communities'.

### Age (required): Positive

Impact (required): Children, families and individuals who are vulnerable (eligible for benefits, allocated a social worker or in a low income setting) or find themselves in hardship due to the impact of COVID 19, this programme, with signposting from agencies, will help to identify and help those people to ensure they have access to food and heating this winter, as well as other basics which may be identified such as cooking facilities, bedding or other essentials.

### Disability (required): Positive

Impact (required):

Children, families and individuals with disabilities and who are vulnerable (eligible for benefits, allocated a social worker or in a low income setting) or find themselves in hardship due to the impact of COVID 19, this programme, with signposting from agencies, will help to identify and help those people to ensure they have access to food and heating, as well as other basics which may be identified such as cooking facilities, bedding or other essentials.

Sexual orientation (required): Neutral

Race (required): Neutral

Religion or belief (required): Neutral

Gender reassignment (required): Neutral

**Gender (required):** Neutral

Marriage or civil partnership (required): Neutral

Pregnancy and maternity (required): Neutral

Poverty (required): Positive

**Impact (required):** Additional funding will be distributed to help those children, families and individuals who live in poverty or are in need of food, energy and other basic items, should have more access to help.

# Rurality (required): Neutral

Any other brief information which you feel is pertinent to this assessment (optional):

Please confirm that the accountable officer has agreed the contents of this form (required): Yes

# **Appendix 2 – COVID Local Support Grant Guidance**

# COVID Local Support Grant extension: – Guidance for County Councils and Unitary Authorities in England

### Introduction

- The £160 million COVID Local Support Grant extension (CLSG) will be made available to cover the period 21 June 2021 to 30 September 2021 inclusive to support those most in need across England with the cost of food, energy (heating, cooking, lighting), water bills (including sewerage) and other essentials.
- 2. The Department for Work and Pensions (DWP) is providing funding to County Councils and Unitary Authorities (including Metropolitan Councils and London Boroughs), under section 31 of the Local Government Act 2003, to administer the scheme and provide assistance to vulnerable families with children and other vulnerable households, particularly affected by the pandemic. County Councils and Unitary Authorities in England have a statutory duty for childcare and have the ability to deliver the scheme through a variety of routes including issuing grants to third parties, providing vouchers to households or making direct provision of food, for example. County Councils are encouraged to work together with District Councils to provide support and ensure the funding meets its objectives. Note: County Councils and Unitary Authorities will be referred to as 'Authorities' throughout the remainder of this guidance.
- 3. Guidance has been updated to reflect new funding amounts and amended reporting dates. General guidance, including spend frameworks, eligibility and MI completion have remained broadly the same
- 4. This guidance sets out the required collaboration between DWP, Authorities, including their delivery partners, such as District Councils and charitable organisations etc., to successfully meet the policy intentions within the agreed framework. It also provides any constraints that we need to work within and the distribution of funding and reporting arrangements.
- 5. The aim is to give vulnerable households peace of mind as COVID restrictions are eased by helping those who need it to have food on the table and other essentials.
- 6. Authorities have the local ties and knowledge, making them best placed to identify and help those children, families and individuals most in need. It is important to stress this covers a wide range of vulnerable households including children of pre-school age too. Targeting this money effectively will ease the burden faced by a wide range of vulnerable households across the country worrying about paying the next utility bill or the next food shop due to the pandemic.
- 7. Rather than focus on one specific vulnerable group Authorities should try and use the wide range of data and sources of information at their disposal to identify and provide support to a broad cross section of vulnerable households in their area. Authorities have access to a variety of different benefit information through DWP's Searchlight portal which provides information on

- individual citizen's entitlement to (and confirms receipt of) DWP welfare benefits. However, support is not restricted to vulnerable households in receipt of benefits. Therefore, Authorities should try, where possible, to identify vulnerable households using other sources of information, such as social workers, troubled families' advisors and utility companies.
- 8. From June 2021 we have started to provide LAs with information relating to Universal Credit claims with limited capability for work or, earnings below the free school meals and free prescription thresholds in your area. You may find this information useful in identifying vulnerable families impacted by the pandemic.
- 9. This guidance applies to Authorities in England only and should be read in conjunction with the COVID Local Support Grant Determination issued with this guidance.

# Objective and key principles

- 10. The objective of the COVID Local Support Grant extension is to provide support to vulnerable households and families with children particularly affected by the pandemic where alternative sources of assistance may be unavailable.
- 11. When administering this scheme, you are encouraged to adopt the following principles:
  - use discretion on how to identify and support those most in need;
  - use the funding from 21 June 2021 up to 30 September 2021 to meet immediate needs and help those who are struggling to afford food and utility bills (heating, cooking, lighting) and water for household purposes (including drinking, washing, cooking, central heating, sewerage and sanitary purposes), or other related essentials. This includes payments made, or committed to, by the Authority or any person acting on behalf of the Authority, from 21 June 2021 to 30 September 2021. For example, this would allow food vouchers issued before the end of the funding period to be redeemed in early October 2021. All authorities are encouraged to ensure that any vouchers issued are redeemed before the end of the scheme, or shortly thereafter, or consider recycling unused vouchers;
  - work together with District Councils including, where necessary and appropriate, other local services, such as social and care workers to help identify and support households within the scope of the scheme;
  - Funds should be spent or committed before 30 September 2021 and not held over for future usage;
  - Any underspends from the previous CLSG for the period from 17 April to 20 June 2021 can be used during the CLSG extension to 30 September 2021;
- 12. When deciding how to help people, you should consider:

- how you plan to provide support to vulnerable households, in other words, paying into bank accounts, use of cash and vouchers;
- any risks associated with these payment methods see section Managing the risk of fraud.

### Communication

13. The Authority must, as appropriate and practical, reference that the grant is funded by the Department in any publicity material, including online channels and media releases.

### Access to data

- 14. The COVID Local Support Grant extension is being classified as Local Welfare Provision (LWP) and local authorities (LAs) who have signed and returned the relevant section (Annex C) of the DWP/LA Memorandum of Understanding (MoU) have legal permission to access DWP's Searchlight portal. This portal provides information on individual citizen's entitlement to (and confirms receipt of) DWP welfare benefits. Therefore, this data can be used to help Authorities identify those families and individuals to whom to target this support.
- 15. Staff accessing Searchlight will need to be registered with the Employee Authentication System (EAS). Further information on Searchlight can be found in the local authority Searchlight Training Pack available in the Searchlight folder on Glasscubes (the LA/DWP online collaboration tool). If your Authority needs to discuss access to Glasscubes, contact DWP at <a href="mailto:lawelfare.lasupport@dwp.gov.uk">lawelfare.lasupport@dwp.gov.uk</a> and we will arrange for this to be provided.
- 16. Authorities do not have permission for the purposes of this scheme to access the 'Income' data provided on Searchlight for the Test and Trace Support Payment Scheme.
- 17. Searchlight can only be used to verify a specific individual's DWP benefit information. Therefore, if an Authority identified a group of potential customers who may be eligible for the scheme from their own records, they can access Searchlight to verify each claimant's DWP benefit entitlement (although benefit entitlement is not a condition of support).
- 18. We intend to provide authorities with details of UC claimants in their authority whose income is below the Free School Meal and free prescription thresholds for both individuals and summary level by Ward. Authorities also have access to their own non-DWP data to help identify vulnerable households who may be eligible for support under this scheme.
- 19. We are also providing 2 UC claim data shares on a monthly basis.

**File one** – contains the National Insurance number of Universal Credit (UC) claimants within the LA area and:

 income below the thresholds of £7,400 per year for free school meals and income below the free prescription threshold of £935 per month as identified in their last UC assessment period;

- those with a Limited Capability for Work indicator within the last assessment period; and
- the number of children in the household.

**File two** – contains aggregate data showing those people at or below the:

- free school meal income threshold;
- · free prescription income threshold; and
- are in the Limited Capability for Work group.

For a full breakdown of the file contents see Annexe B

This data can be used to determine a person's eligibility or continued eligibility for Local Welfare Provision (LWP) for which the CLSG extension is classified. The data is being provided under the terms of the Memorandum of Understanding (MOU) 'Department for Work and Pensions and local authorities financial year ending March 2021. (Access, handling, exchange and protection of Department for Work and Pensions' and HM Revenue and Customs' data)'. The MOU's Annex C covers the provision of data for LWP purposes and the new data share will be added to this Annex C in future iterations.

# Working with other organisations

- 20. Authorities should develop a 'local eligibility framework and approach' to enable them to distribute grant funding that best supports vulnerable families and individuals. The focus is on the provision of food, energy, water and/or associated financial support to vulnerable households with children (see the definition of a child under paragraph 26). A proportion of funding (up to 20%) is also available for vulnerable households without children (including individuals) so that no vulnerable household is excluded.
- 21. Authorities have flexibility to develop a local delivery approach that best fits the scheme's objective. Where Authorities choose to work with multiple organisations to provide a local delivery network or where Authorities choose to engage with District Councils to deliver this grant on their behalf, detailed arrangements and funding should be made available to those organisations as soon as possible so that support for vulnerable children and families can be provided as soon as is practically possible.
- 22. County Councils are encouraged to work collaboratively with District Councils and other organisations in their area who may come into contact with those households who are eligible and would benefit from this grant. Authorities that do not have the mechanisms in place to administer this grant are encouraged to consider whether District Councils are better placed to do so on their behalf. If Authorities decide to engage with District Councils in this way they are encouraged to do so as quickly as possible to ensure roles, responsibilities and effective arrangements are put in place to deliver the scheme promptly and efficiently. Where Authorities are working with Third Party Organisations (TPOs), this should be done on an objectively fair, transparent and non-discriminatory basis, having regard to the time available to deliver the scheme.

23. DWP Jobcentre Plus staff have been made aware of the scheme extension and will aim to connect their local partners to raise awareness and support Authorities with the delivery of the scheme to ensure it is making a real difference at a local level.

# **Establishing eligibility**

- 24. Authorities have the flexibility within the scheme to identify which vulnerable households are in most need of support and apply their own discretion when identifying eligibility. Authorities can request applications for support or can proactively identify households who may benefit, or can take a mixture of the two approaches. There is no requirement for Authorities to undertake a means test or conduct a benefit check unless this specifically forms part of the Authority's local eligibility criteria. In accordance with their general legal duties, Authorities must have a clear rationale or documented policy/framework outlining their approach including how they are defining eligibility and how households access the scheme.
- 25. Awards must be based on the following framework:
  - at least 80% of the total funding will be ring-fenced to support households with children, with up to 20% of the total funding to other households experiencing, or at risk of experiencing, poverty during the pandemic. This may include households not currently in receipt of DWP welfare benefits;
  - at least 80% of the total funding will be ring-fenced to provide support with food, energy and water bills for household purposes (including drinking, washing, cooking, central heating, and sanitary purposes) and sewerage.
     Within this condition there is flexibility about the proportion of support allocated to food and to bills:
  - up to 20% of the total funding can be used to provide support with other essentials clearly linked to the scheme conditions (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;
  - the scheme is not intended to cover payment of rent or other housing costs because these are not directly related to food or utility bills and other benefits and support is available to cover these costs. Nor is it intended to be used for the provision of general advice on managing debt and/or financial hardship;
  - it is important that Authorities develop overall policies appropriate for their areas, and proportionate procedures, for the allocation of the grant monies by reference to the above criteria;

# **Funding overlap**

- 26. Authorities should consider the 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. For example, a household may:
  - have additional wider needs in terms of food;
  - need support with provision for cooking, lighting, heating and/or water (including sewerage);
  - require other essential supplies;

### **Definitions**

- 27. For the purpose of this grant (and without prejudice to other schemes):
  - The definition of a child is any person:
    - o who will be under the age of 19 as at 30 September 2021 or
    - a person aged 19 or over in respect of whom a child-related benefit (for example, Child Benefit) is paid or free school meals are provided; or
- 28. Where an eligible child lives on his or her own, they are a household that includes a child covered in the 80% allocation for households with children.
- 29. Vulnerable households which include a person aged 19 to 25 with special educational needs and disability (SEND) and/or care leavers may still be eligible for grant support however that support falls within the 20% allocation to households without children.
- 30. The definition of energy includes any form of fuel that is used for the purpose of domestic heating, cooking and lighting, including oil and portable gas cylinders. There is no prescriptive definition of other essentials although these should be related to food, heating, lighting, cooking, water and sewerage needs. Authorities have discretion to assess what is reasonable to assist those experiencing or at risk of poverty during the Covid-19 pandemic. Illustrative examples include: a warm blanket or duvet, heater, essential toiletries such as sanitary products. It is not intended to cover debt advice and general financial hardship support not linked to food, warmth and/or hygiene. Housing costs are expressly excluded.
- 31. Third party organisations may include but are not limited to:
  - o Registered charities and voluntary organisations
  - o Schools
  - Food banks
  - General Practitioners
  - Care organisations

# Reporting requirements

- 32. Authorities are required to make one Statement of Grant Usage and management information (MI) return see the Grant Determination. The deadline for completing this return is shown in the table below. Completed MI returns should be sent to lawelfare.pdt@dwp.gov.uk
- 33. An interim MI return is required for the previous CLSG for the period 17 April to 20 June 2021. The interim MI return will be used to determine eligible spend to 20 June 2021 and an interim grant payment will be made to your LA for this period when the information in your return have been verified.
- 34. A final MI return is required showing total spend from 17 April to 30 September 2021. The final MI return will be used to determine eligible spend to 30 September 2021 and a final grant payment will be made to your LA for this period when the information in your return have been verified.
- 35. Authorities should use the standard MI reporting template provided, which incorporates the Statement of Grant Usage. For the purpose of this section:
  - **Grant allocation** refers to the amount of grant allocated to a TPO to distribute to vulnerable households.
  - **Grant award or spend refers** to the amount provided or paid to vulnerable households under the remit of this grant.
  - Please asterisk or highlight in the tables where estimates have been used instead of actuals.

| MI return  | Reporting period    |                       |              |
|------------|---------------------|-----------------------|--------------|
| Interim MI | From: 17 April 2021 | To: 20 June 2021      | Deadline:    |
| return     |                     |                       | 09 July 2021 |
| Final MI   | From: 17 April 2021 | To: 30 September 2021 | Deadline:    |
| return     | ·                   |                       | 22/10/2021   |

- 36. It is the responsibility of Authorities to provide the MI returns to DWP. Failure to return the MI by the deadline may result in a delayed payment.
- 37. The reporting requirements for Authorities (including District Councils that may be asked to support the distribution of the grant in Shire County Councils) are different to the reporting requirements for TPOs for example, charitable or voluntary organisations.
- 38. The main difference between the reporting requirements for Authorities and TPOs relates to the level of detail regarding spend and volumes relating to:
  - families with and without children; and
  - food, utility bills and other essentials
- 39. Where Authorities (including District Councils) issue awards directly to vulnerable households they should either obtain information at source or via information or data they have access to, to complete the split of spend and number of awards across the eligibility criteria, in other words, families with and without children and food, utility bills and other essentials. Where

Authorities decide to deliver support to vulnerable households through TPOs they should use whatever information the TPO holds, or other available data, to estimate the level of spend and volume of awards across the eligibility criteria.

40. The different elements of the MI template are shown below together with guidance on how to complete them.

Table 1

| Table 1: Governance                 | Response |
|-------------------------------------|----------|
| Local Authority (full name)         |          |
| Section 151 officer (name)          |          |
| Section 151 officer (email address) |          |
| Reporting Period                    |          |
| Approved signed off by              |          |
| LA Single Point of Contact          |          |
| Date Returned to DWP                |          |

- 41. Each MI return must include your Section 151 Officer's name and email address to provide assurance on validation of funding spend. If they are the same contact, please input details in both response fields.
- 42. We also require you to copy your Chief Financial Officer and Section 151 Officer into the email, providing this assurance when you return the MI template to DWP.

Table 2

| Table 2: Total Awards                  |            |  |  |  |
|--|------------|--|--|--|
| ltem                                   | Spend (£s) |  |  |  |
| a) Total amount provided to vulnerable |            |  |  |  |
| households                             |            |  |  |  |
| b) Administration Costs                |            |  |  |  |
| c) Total spend (a+b)                   |            |  |  |  |

- Total Amount provided to vulnerable households this is the total amount of the grant fund that has been paid/awarded to vulnerable households. It includes amounts paid by Authorities and by TPOs on behalf of Authorities. It should not include amounts allocated to TPOs that have not been spent during the reporting period.
- **Administration costs** this includes reasonable costs incurred administering the scheme. These include for example:
- staff costs
- advertising and publicity to raise awareness of the scheme
- web page design
- printing application forms
- small IT changes, for example, to facilitate MI production

 Total Spend – this is the total of the above. It is the amount that will be used to determine the grant funding payment, from DWP to cover the full cost of administering the grant in your area. A single grant payment will be made in arrears on the receipt of a fully completed and verified MI return.

### Table 3

|       | Table 3: Total Value of Awards split by Household Composition |                  |  |                |
|-------|---|------------------|--|----------------|
|       |   | a) Families with | b) Families without children and Individuals | c) Total (a+b) |
|       |   | Children         |  |                |
| Row 1 | Authority Spend (£s)  |                  |  |                |
| Row 2 | Authority Volumes   |                  |  |                |
| Row 3 | TPO Estimated Spend (£s)                                      |                  |  |                |
| Row 4 | TPO Estimated Volumes   |                  |  |                |

- 43. Table 3 relates to grant spend and the estimated volume of awards made in relation to families with and without children. Rows 1 and 2 relate to grant awards made by Authorities (including District Councils) directly to vulnerable households, and rows 3 and 4 relate to grant awards to vulnerable households made by TPOs.
- 44. **Authority Spend (£s)** this is the amount paid/awarded to vulnerable households within the eligibility criteria. Authorities should make every effort to gather information to establish whether a child resides in the household (including being the only member of the household) in order to complete the template as fully as possible. This information is important for DWP to report to Ministers and evaluate how successful the scheme has been in providing support to households with and without children.
- 45. Authorities should either gather information or check existing records they hold or have access to, to establish whether the household includes a child (as defined above) and complete columns a and b accordingly. Responsibility for MI reporting rests with Authorities. Where Shire Counties pass grant allocations to District Councils, District Councils should pass the information relating to columns a and b to the County Council/Unitary Authority to collate the information and send one collated template to DWP.
- 46. **Authority Volumes** this is the number of individual/separate payments made to vulnerable households within the eligibility criteria. If multiple awards are made to the same household throughout the period of the scheme each award should be counted separately. For example, where an award is made to a household with multiple children it should be classed as a single award.
- 47. TPO Estimated Spend and TPO Estimated Volumes we acknowledge that some TPOs, for example, charitable and voluntary organisations such as food banks, have limited or no access to household information and may not be in a position to provide this information to the same level of accuracy as Authorities. We are therefore asking Authorities and TPOs to estimate, to the best of their ability, the level of spend and the volume of awards across the different eligibility criteria in rows 3 and 4.
- 48. Authorities should list these TPOs in Table 5 together with the amount of grant allocation they have been provided. More guidance relating to Table 5 is included later in this section.

### Table 4

|       | Table 4: Total Value of Awards Split by Category |                     |                     |                |
|-------|--|---------------------|---------------------|----------------|
|       |  | a) Food and Utility | b) Other Essentials | c) Total (a+b) |
|       |  | Bills               |                     |                |
| Row 1 | Authority Spend (£s)                             |                     |                     |                |
| Row 2 | Authority Volumes                                |                     |                     |                |
| Row 3 | TPO Estimated Spend (£s)                         |                     |                     |                |
| Row 4 | TPO Estimated Volumes                            |                     |                     |                |

- 49. Table 4 relates to grant spend and the estimated volume of awards made in relation to food, utility bills (in other words, household energy and water) and to other essentials. Rows 1 and 2 relate to grant awards made by Authorities (including District Councils) directly to vulnerable households, and rows 3 and 4 relates to grant awards to vulnerable households made by TPOs.
- 50. Authority Spend (£s) this is the amount paid/awarded to vulnerable households in respect of food and utility bills or other essentials.
- 51. Rows 1 and 2 relate to awards/payments made directly to vulnerable households by Authorities including District Councils. It does not include grant funding spent by TPOs e.g. charitable and voluntary organisations. The value and volume of grant spent by TPOs should be captured in rows 3 and 4.
- 52. Authority Volumes this is the number of individual/separate payments made to vulnerable households within the eligibility criteria. If multiple awards are made to the same household throughout the period of the scheme each award should be counted separately. There is no requirement to distinguish between awards for food and utility bills these are both included in the same category of spend.
- 53. TPO Estimated Spend and TPO Estimated Volumes we acknowledge that some TPOs, for example, charitable and voluntary organisations have limited MI and may not be in a position to provide this information to the same level of accuracy as Authorities. We are therefore asking Authorities and TPOs to estimate, to the best of their ability, the level of spend and the volume of awards across the different eligibility criteria in rows 3 and 4.
- 54. Total the total spend in Table 2 row a, Table 3 column c and Table 4 column c should add up to the same amount.
- 55. When allocating spend and the volume of awards across the eligibility criteria please follow the guidance below.
- 56. Table 3 and Table 4 ask for spend and award volumes to be recorded against two sets of criteria. Therefore, the details of each award need to be recorded twice once against one set of criteria and then a second time against the other criteria. Shown below is a worked example of how the MI template should be completed.
- 57. The eligibility criteria set two separate categories of spend, both with (at least) 80% and 20% splits. This is because the categories of spend cover separate subjects. One relates to household composition and one relates to the type of support being provided, for example, food and utility bills or other essentials.
- 58. Authorities are asked to report and manage spend in relation to both these areas. For example, if a £100 award is made to a family with children for food, you would allocate £100 to the 'family and children' section in Table 3 and £100 to the 'food and utility bills' section in Table 4. You would also allocate one award in both these sections of Table 3 and Table 4.

59. Each award needs to be allocated twice – one allocation to each of the eligibility category tables so that when you report on the total spent on family composition and the total spent on the type of support, both eligibility criteria categories will total the amount you have paid. The total volume of awards in Table 3 and Table 4 should also be the same.

### Additional guidance and examples when working with TPOs

- 60. Please include, where possible, an estimate of the amount of spend across the following categories:
  - families with or without children, and
  - food, utility bills, or other essentials.
- 61. Please estimate this to the best of your ability.
- 62. For example, if you have allocated:
  - grant funding to a food bank to provide food to vulnerable people, establish
    the amount of that allocation the food bank has spent and enter the full
    amount spent under food and utility bills as you know that the grant
    allocation has been spent in respect of food, and estimate the split across
    families with and without children in accordance with Example 1 below.
  - grant funding to a charity that specialises in providing vulnerable children with clothing, establish the amount of that allocation the charity has spent and enter the full amount spent in 'families with children' and the full amount of the grant spent in 'other essentials'. This is because you know that the purpose of the grant is for children and the nature of support is clothing which comes under other essentials. Update Table 5 to provide a more detailed description of 'other essentials' for this TPO in Table 5 column b, something along the lines of 'provision of blankets and warm clothing'.
- 63. The amount of MI available will vary considerably across each TPO. Please use whatever information is already available or reasonable to collect to be as accurate as possible, although we understand estimates may be provided. Please asterisk or highlight where estimates have been made.
- 64. Shown below are some examples of how to complete the template.

### **Example 1**

- 65. A food bank operates on an open basis where anyone can turn up and pick up food and supplies. This is not an award made directly to vulnerable families by an Authority. The cost is picked up by a TPO, for example, the food bank. The MI template should be completed as per guidance below.
- 66. The total value of grant spent and the volume of awards made by the charity or voluntary organisations providing the food bank should be entered in Table 3 and Table 4. The Authority or food bank provider will need to estimate the split between families with and without children to the best of their ability.

- 67. If the food bank provider captures this MI and you can make a more accurate estimate of the split between families with and without children, then you should do so. If not, calculate the split between families with and without children based on published data which estimates that 40% of food parcels issued by food banks are made to families with children.
- 68. Table 5 should contain the total grant allocated to the TPO.

### Example 2

- 69. The Authority directly provides cash/vouchers etc. to vulnerable households. These could be redeemable at a number of food outlets including supermarkets or food banks. Food voucher amounts can vary depending on how many children reside in the family. Authorities are expected to collect or verify information to establish whether the award is made to a family with or without children. The MI template should be completed as follows:
  - the value of award should be entered in Table 3 in 'spend' row 1 column a and row 1 column b based on the information the Authority has been capturing to split spend across these categories. Where data is not available an estimate can be used;
  - the volume of awards should be included in Table 3 'volume' row 2 column a and row 2 column b based on the information the Authority has been capturing to split the volume of awards spend across these categories.
     Where data is not available an estimate can be used:
  - the value of award should be entered in Table 4 row 1 column a because it relates to food:
  - the award should be entered in Table 4 volume row 2 column a because it relates to food:
  - nothing should be included in Table 5 because this is a payment made directly from the Authority to the vulnerable household not a payment to a TPO;

### Table 5

| Table 5:   | Table 5: Grant Allocation Details |  |  |  |  |
|--|-----------------------------------|--|--|--|--|
|  |                                   |  |  |  |  |
| Name of a) Amount of Grant allocated to TPO (£s) Third Party Organis ation (TPO) |                                   | b) Where the grant allocation covers the category "other essentials" please provide a more detailed description of what it covers. |  |  |  |
|  |                                   |  |  |  |  |
|  |                                   |  |  |  |  |
|  |                                   |  |  |  |  |
|  |                                   |  |  |  |  |
|  |                                   |  |  |  |  |
|  |                                   |  |  |  |  |

70. Table 5 is a list of TPOs you have allocated grant funding, to distribute to vulnerable households on your behalf. Do note that this excludes District Councils. Please provide the amount of grant allocated to each TPO in Table 5 column a.

- 71. This section covers grant allocations **not** the amount of grant awards/spend TPOs have provided to vulnerable families.
- 72. Please name all the organisations you are working with in your area together with the value of the grant allocation for each organisation. Authorities should have a good idea what the grant allocations made to TPOs will be used for. Where the grant allocation is intended to cover support other than food or utility bills, in other words, the other essential category, please provide a more detailed description in Table 5 column b outlining the nature of that support.

# **DWP** engagement

- 73. LA relationship managers from DWP's LA Partnership, Engagement and Delivery division will contact Authorities to provide support and gather information throughout the scheme. Examples where LA relationship managers will contact Authorities for initial compliance where:
  - the MI templates have not been completed and returned;
  - the MI templates have not been copied to the Authority's S151 officer or CFO;
- 74. They will also contact Authorities where further clarification is needed in respect of the information provided on the MI reporting template, if for example:
  - critical data is missing or the data looks odd, or
  - the Authority is reporting a high value of awards where they have not been able to establish the household composition. We may need the Authority to explain why that is the case and provide supporting evidence.
  - the Authority is reporting a high value of administration costs. We may need the Authority to explain why that is the case and provide supporting evidence.
  - there is a significant gap between actual and allocated spend. We may need the Authority to explain why spend was so low.
- 75. They will look to identify good practice and identify case studies where appropriate.
- 76. They will also engage with Authorities around completion of the questionnaire issued with this guidance regarding delivery plans for the grant. Please complete and return this questionnaire by the 16 July 2021 and send it to: LAWELFARE.PDT@DWP.GOV.UK
- 77. DWP will also continue to engage with Authorities to respond to questions we receive via the designated inbox as quickly as possible.
- 78. Jobcentre Plus may engage with other local stakeholders to gather intelligence on how funding is being used and assess its impact.
- 79. Where Authorities work with District Councils and TPOs it is the responsibility of Authorities to collect and collate MI and complete one collated MI return and submit to DWP.

# **DWP** funding arrangements

- 80. This COVID Local Support Grant extension is ring-fenced. To ensure that the objectives of the fund are being met during the course of the grant and reduce administration costs for all concerned, including the need for DWP to recover underspend, grant payment will be made in arrears. This will enable DWP to adjust the amount of the payment based on the MI returns.
- 81. Payment of the grant from DWP to Authorities will be paid in arrears at the end of grant period after we have verified the end of scheme MI return in October 2021. If an Authority feels that the payment arrangements will create significant cash flow problems please notify DWP as soon as possible with supporting evidence. The COVID Local Support Grant extension is an extension to the support offered by the COVID Local Support Grant for the period 17 April 2021 to 20 June 2021. An interim MI return and an interim grant payment will be made in respect of the period to 20 June 2021.
- 82.MI returns **must be endorsed by the S151** officer in accordance with their statutory assurance responsibility in order for the grant payment to be made by copying your Chief Financial Officer and Section 151 Officer into the email.
- 83. The guidance for completion is provided on a separate tab within the MI template.
- 84. The definition of spend includes grant funding that has been provided to vulnerable households, within the scope of the eligibility criteria, and within the period of the scheme 17 April 2021 to 30 September 2021.
- 85. Spend also includes 'committed spend'. For the purpose of this scheme committed spend relates to grant funding that has been spent and delivered to vulnerable households even though the vulnerable household may not have used their grant funding. An example would be the award of a food voucher on 30 September 2021 to a vulnerable household. It would be unreasonable to expect the family to be restricted to redeem the voucher on the day of receipt. In this example spend has been committed by the Authority, support has been provided to a vulnerable household and, therefore, should be included as eligible grant spend. It would be reasonable to expect the vulnerable household to redeem the food voucher during the first few weeks following the end of the scheme.
- 86. However, committed spend does not include large volumes of food vouchers, procured quite late in the scheme, which cannot be distributed to vulnerable households within the period of the scheme. We do not expect Authorities to stockpile large quantities of food vouchers for use after the scheme has ended.
- 87. Authorities that plan to order vouchers in bulk should attempt to be realistic in the volumes ordered to avoid holding large stocks of unused vouchers at the end of the scheme. Alternatively, Authorities may want to consider:
  - purchasing vouchers on a sale or return basis, so that they can return any unused vouchers, or
  - if the Authority wants to use the vouchers after the end of the CLSG scheme they should be funded through other means.

- 88. The definition of committed spend for the purpose of this scheme does not affect its accounting treatment in accordance with normal rules.
- 89. The timetable for provision of funding and MI returns is as follows:

### **Funding:**

| Payment | Amount<br>(%)                       | Date                      | Notes                   |
|---------|-------------------------------------|---------------------------|-------------------------|
| Interim | Up to 100% of initial allocation*   | August/September 2021     | Payment made in arrears |
| Final   | Up to 100% of extension allocation* | November/December<br>2021 | Payment made in arrears |

<sup>\*</sup>subject to eligible spend criteria

# Managing the risk of fraud

- 90. Fraudsters have been targeting COVID-19 support funds.
- 91. As with any welfare payment to vulnerable recipients there is a risk of fraud, as recipients might appear to be eligible when they are not.
- 92. To help mitigate this risk, Authorities should involve District Councils and other organisations chosen to administer this scheme to help identify vulnerable families, households and individuals.
- 93. Authorities wishing to work with TPOs to deliver the scheme **must** carry out suitable due diligence checks to ensure they are viable and able to deliver the support. So, for example, ensuring all charities are registered and taking extra caution if they are new organisations.
- 94. Authorities are also encouraged to ensure checks are in place to verify the identity of those eligible.
- 95. Authorities are encouraged to ask neighbouring authorities to work together to help prevent double provision especially where allocation of provision is by school in one area and by residential address in another.
- 96. It is for Authorities to decide how payments are made to recipients. However, when making decisions, Authorities should consider the risks involved. Although they still carry fraud risks, vouchers should be used instead of cash where possible as this helps to mitigate the risk of the money being spent by the recipient on things outside of the policy intent.
- 97. Authorities should ensure that they consider and put in place suitable controls when making use of vouchers as part of this scheme. Authorities may wish to consider restricting access to these vouchers; and also consider restricting usage to ensure that they cannot be spent outside the intended scope of this Scheme.
- 98. Where possible, any payments made into a bank account should be in the same name of the person that is eligible for that payment. Authorities have access to a range of data sources, and checks can be carried out against this

- data to verify the identity of the recipient. Authorities are also encouraged to use existing tools at their disposal to verify personal bank accounts.
- 99. If the Authority has any grounds for suspecting financial irregularity in the use of any grant paid under this Determination, it must notify the department immediately, explain what steps are being taken to investigate the suspicion and keep the Department informed about the progress of the investigation. For these purposes 'financial irregularity' includes fraud or other impropriety, mismanagement, and the use of grant for purposes other than those for which it was provided.
- 100. If you suspect fraud, you should notify DWP at:

### LA-PED.LAGRANTSPROJECTTEAM@dwp.gov.uk

### 101. of the:

- number of instances
- total amount lost
- 102. This will help DWP identify any emerging threats and share them with other Authorities, so they can take steps to prevent and detect any fraud in their schemes.

### Individuals with No Recourse to Public Funds

- 103. Authorities can provide a basic safety net support to an individual, regardless of their immigration status, if there is a genuine care need that does not arise solely from destitution, for example if:
  - there are community care needs
  - they have serious health problems
  - there is a risk to a child's wellbeing
- 104. The rules around immigration status have not changed. Authorities must use their judgement to decide what legal powers and funding can be used to support individuals who are ineligible for public funds or statutory housing assistance.

# Complying with Subsidy (previously State Aid) rules

- 105. The funding is intended to benefit households struggling to afford food and other essential items as a result of COVID-19. The funds should not be used for any economic undertaking.
- 106. Whichever way you use the funding, including where you work in partnership with others, you should consider all Subsidy rules (previously state aid) issues. Check whether the 'de minimis' regulation exception applies. You should also follow government procurement procedures where relevant.

### **Administration costs**

- 107. The COVID Local Support Grant extension funding allocation includes reasonable administration costs to enable Authorities to deliver the scheme. Authorities should deduct their estimated administration costs from the total allocation to determine the amount remaining.
- 108. In all cases, Authorities should keep administrative costs to a reasonable level.
- 109. Administration costs for each Authority will be published on www.gov.uk alongside detail of all spend related to this scheme.
- 110. Examples of administration costs include reasonable:
  - staff costs
  - · advertising and publicity to raise awareness of the scheme
  - web page design
  - printing application forms
  - small IT changes, for example, to facilitate MI production

# **Public Sector Equality Duty**

- 111. DWP has undertaken an Equality Impact Assessment and is willing to provide Authorities with advice and support in complying with their duties if required.
- 112. Under the Equality Act 2010, all public authorities must comply with the Public Sector Equality Duty. For the purposes of this grant, you should consider how any support that helps people facing severe financial hardship impacts those with characteristics protected under the Equality Act.
- 113. When developing your local delivery frameworks, you should ensure people are not disadvantaged or treated unfairly by this scheme. For example, any application process should be easy to access and to navigate.

### **Questions and answers**

114. Questions and answers can be found at Annex A

### Contact

115. If you have any queries about the content of this guidance or use of the funding you can email <u>LA-PED.LAGRANTSPROJECTTEAM@dwp.gov.uk</u>