

## London Borough of Enfield

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**Subject: Housing Support Grant – Proposals for Spend April 2022 to September 2022**

**Executive Director: Fay Hammond**

**Key Decision: KD5455**

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### **Purpose of Report**

1. To seek approval of the proposals outlined within this report that detail how to distribute the £2,847,994.64 Housing Support Grant (HSG) that is being funded by the Department for Work and Pensions (DWP). The grant must be spent during the period 1<sup>st</sup> April to 30<sup>th</sup> September 2022.

### **Proposal(s)**

2. The purpose of the grant is to provide support to households, particularly those including children and pensioners, who would otherwise struggle to buy food or pay essential utility bills or meet other essential living costs or housing costs (in exceptional cases of genuine emergency) to help them with significantly rising living costs.
3. The grant allocation requirements are:
  - i. at least 33.33% of the grant is allocated to households with children (defined as a person who will be under the age of 19 as at 30<sup>th</sup> September 2022, or a person aged 19 or over in respect of whom a child-related benefit is paid or free school meals are provided during the Grant Period;
  - ii. at least 33.33% of the grant is allocated to support households that include a person who has reached state pension age by 30<sup>th</sup> September 2022;
  - iii. up to 33.33% of the grant is used to assist other households.
4. (i) The funding is subject to the terms and conditions of agreement and to authorise entry into the grant agreement with DWP  
  
(ii) The funding is intended to ensure support is given to a wide range of low-income households that cannot increase their income through work, to prevent escalation of problems.  
(iii) To authorise legal officers (where so required) to enter into legal agreement and complete all necessary legal documentation with the DWP

(iv) To note and agree strict compliance with all conditions included in the Household Support Fund Grant Determination Letter **No 31/3096** and associated terms and conditions included in Annex B to achieve the objectives of this arrangement.

### **Reason for Proposal(s)**

5. Previous support has helped a vast range of Enfield residents. A previous grant amount of £2,847,994.64 enabled us to offer support to schools, with vouchers, an extension to free school meals and winter clothing. In addition to this, we funded three community food kitchen spaces, the purchase of twenty bicycles through Cycle Enfield. Young Chef programme 2022 and the purchase of 15,000 Take & Make Food boxes, which created 60,000 meals.
6. We also targeted support to 7,000 residents on the lowest income in receipt of Housing Benefit, Council Tax Support and/or Universal Credit that were deemed to be at risk and in crisis, by issuing a £100 PayPoint voucher. In addition, 2,000 households were supported with a crisis payment where they presented themselves in need of support during casework delivered by a range of agencies. The experience of the support we have provided in the past has helped us understand how residents in need respond to different types of support and have helped us mine our data to target those most in need.
7. The aim of this proposal, which responds to new HSG grant allocation and amended guidance, is to use our experience gained so far to direct the limited grant funding at those most in need, with minimal administrative burden, and by accessing the best intelligence available on how to achieve this.

### **Relevance to the Council Plan**

8. Good homes in well-connected neighbourhoods

Good homes and well-connected neighbourhoods are more than simply the bricks and mortar that dwellings are constructed from. Good homes are about the lives that people lead within those homes. The proposed use of the DWP grant will enhance the lives of some of the borough's most vulnerable people by providing them with a means to help support them or their families over the 6 months funding period and during school holidays. By doing this, the borough's residents will be able to lead better lives in better homes.

9. Sustain strong and healthy communities

Food and warmth are a basic need for all people. The ability to have food and stay warm is essential for the health of the community, and the proposed spend outlined within this report will help those residents that are most at risk of missing these basic essential needs.

10. Build our local economy to create a thriving place

The proposals outlined within this report for the distribution of the DWP grant will ensure that those residents at risk of financial hardship will be able to

spend money in the local community through the purchase of food and utilities. A proportion of the funds will most likely be spent in shops within the borough, boosting the local economy and helping to create thriving high streets.

## **Background**

11. The continuing financial hardship facing many people has been well reported in the media in recent months, caused by significantly rising living costs
12. The DWP are funding Local Authorities to administer the HSG to provide financial support to households. The expectation is that it should primarily be used to support households in the most need particularly those including children and pensioners who would otherwise struggle with energy bills, food and water bills. Energy bills may be of particular concern to low-income households during the period of the scheme and Local Authorities should especially consider how they can support households with the cost of energy.
13. Enfield has been allocated £2,847,994.64 from Government who has advised that the grant should be paid to a range of households. The expectation is that at least 33% is for households that have children, 33% for pensioners and up to 33% is for households that do not have children or are pensioners but are vulnerable and most in need.
14. The grant is to be used to support a range of core living needs including food, utility bills and in some circumstances, other exceptional needs. Subject to the agreed allocation of the funds with the DWP, the grant will be paid to the Council in two instalments and distributed to residents between 01/04/22 and 30/09/22. The grant conditions require the Council to record how much has been spent on households with children, households with pensioners and households without children. The Authority must prepare a Statement of Grant Usage to be submitted to the Department at a time and in a form directed by the Secretary of State. The Statement of Grant Usage must provide details of eligible expenditure in the Grant Period. The Statement of Grant Usage must be certified by the Authority's Section 151 officer that, to the best of the officer's knowledge, the amounts shown on the Statement are all eligible expenditure and that the grant has been used for the purposes intended. Funds will be released to the Council in arrears.

## **Main Considerations for the Council**

15. There are a range of considerations for the Council to ensure that the distribution of the funds is clear and transparent, but most importantly has maximum impact for those in financial hardship. The principles applied in developing these proposals included:
  - a. Targeting the funding to ensure that funds are allocated to those most in need,
  - b. Ensuring that the proposed scheme allocates funding as fairly as possible,

- c. Administering the funds as simply as possible to minimise administration burden and cost, and to provide the required record keeping as set out in the grant conditions,
- d. Presenting a transparent scheme that can be readily explained to residents how the Council is spending the grant,
- e. Minimising the need to claim on an individual basis thus making it easier for those at risk to get the help they need directly with dignity.

16. The proposal is that all the funding is targeted. However, running alongside this using the Council's separate discretionary funding, there are support mechanisms in place for those that present themselves to various support services, depending on their need. These services will make sure all benefits entitled to are claimed and debts checked as well as providing other advice and support. In cases of crisis there may also be some assistance that can be provided via the Emergency Support Scheme (Enfield's Local Welfare Assistance Scheme) fund, but this isn't claimed or advertised and is part of the support package provided by various services and organisations when they feel it is needed.

17. As outlined in paragraph 2, the Council is proposing to target the grant at the three following themes which are detailed further below:

- a. Families with children
- b. Pensioners
- c. Other households

**Families with Children – £1,277,994**

18. The Families with Children element would form the largest of the three themes with £1,278M of grant allocated, focusing on approximately 15,000 children eligible for free school meals and 2,000 additional children identified by schools who would benefit from a voucher. The breakdown of the support is as follows:

- 1) June (half term) £15 voucher - total £255,000
- 2) Summer (summer holidays) £40 voucher - total £680,000
- 3) Uniform or extended day provision where the child is fed £300,000
- 4) School Food banks £43,810

The vouchers for June will need to be issued in May.

19. It is proposed that these children are given a £15 food voucher in June and £40 for the summer holiday. The food vouchers, which parents have been accessing since the start of Covid-19 lockdown, will ensure children had access to nutritious food throughout the school holidays.

**Pensioners - £950,000**

20. The Pensioners element will see 8,416 pensioner households on Housing Benefit and Council Tax Support, with no children being offered £115 per

household. This will support pensioners who would otherwise struggle with energy, food, and water bills. We have slightly over allocated based on trends of take up of HSF in the past, that not all vouchers will not be redeemed.

21. Other Households and general administration - **£579,185**

The remainder will be used to fund 4,816 residents deemed to be in relative poverty using benefits data (these are households without children or pensioners). Each household will be offered £85.

645 households with children who are 0 to 5 years old (not entitled to Free School Meals), deemed in relative poverty using benefits data, will be offered £85 per household.

Finally, we will be supporting the following voluntary organisations who will improve the supply of food (including culturally appropriate food) to foodbanks and help the supply of food and set up for food pantries:

- The Felix Project - £35,000
- Food pantries - £20,000
- The Food Alliance - £60,000

£40,000 has been set aside to fund the administration of all the vouchers for this scheme and the scheme for pensioners above.

22. School children will receive payments via Edenred which has been used since Summer 2020 or a via the local school voucher system. Pensioners, residents deemed to be in relative poverty and households will children under 5 will receive vouchers in the post to their home addresses for the post office.

23. Below shows the spending stream breakdown.

| <b>Families with Children</b>                                   |               |               |             |
|---|---------------|---------------|-------------|
|   | Voucher Value | Voucher reach | Total Spend |
| Half Term   | £15           | 17,000        | £255,000    |
| Summer  | £40           | 17,000        | £680,000    |
| Uniform or extended day   |               |               | £300,000    |
| School Food Banks   |               |               | £43,810     |
| <b>Pensioners</b>   |               |               |             |
| Pensioner households on Housing Benefit and Council Tax Support | £115          | 8,416         | £950,000    |
| <b>Other Households</b>   |               |               |             |
| Residents deemed to be in relative poverty                      | £85           | 4,816         | £409,360    |
| Households with Children 0-5                                    | £85           | 645           | £54,825     |
| <b>Food Partners</b>  |               |               |             |
| The Felix Project   |               |               | £35,000     |
| Food Pantries   |               |               | £20,000     |
| The Food Alliance   |               |               | £60,000     |

|                                  |  |  |                   |
|----------------------------------|--|--|-------------------|
| <b>Administration of schemes</b> |  |  | £40,000           |
| <b>Total Expenditure</b>         |  |  | <b>£2,847,995</b> |

### **Safeguarding Implications**

24. It is not believed that there are any safeguarding implications from the proposals outlined within this report.

### **Public Health Implications**

25. The proposals outlined within this report will have positive public health benefits for a significant number of the borough's residents, specifically those who may potentially have greater health challenges. Children's health will be improved via the availability of food vouchers during school holidays and an extension of the free school meals during the spring term. Families in crisis and at risk will also benefit via the payments that will help them to pay for basic needs such as food and fuel for heating. This package of measures will certainly benefit the health of some of the most deprived people in the borough.

### **Equalities Impact of the Proposal**

26. An Equalities Impact Assessment has been completed.

### **Environmental and Climate Change Considerations**

27. It is not believed that there will be any environmental or climate change implications from the proposals outlined within the report.

### **Risks that may arise if the proposed decision and related work is not taken**

28. The grant needs to be spent by 30/09/22. Management information must be provided to the DWP by 22<sup>nd</sup> July 2022 for the period 01/04/2022 – 30/06/22, and by 21<sup>st</sup> October 2022 for six months to 30<sup>th</sup> September 2022. This will ensure that spend is verified to ensure that it has been spent for its intended purpose. Any of the grant not spent by 30/09/22 and for the intended purpose would need to be returned to the DWP.

29. If the decision is taken to not benefit from this funding, then many families will struggle more than they need to. It may also impact the Council's wider budget position as families in crisis may present themselves to the Council and help may need to be funded through alternative sources.

## **Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks**

30. Payments made by Edenred vouchers, direct payments to schools, via Paypoint (cash) or via the post office (cash) may not be redeemed in time. To mitigate this risk, targeting residents needs to be done as early as possible so that residents are contacted to make sure they benefit, or money and vouchers not redeemed can be redistributed to others.
31. The Council is spending money upfront and being paid in arrears by the DWP so risk of potential non-payment by DWP if the Council does not provide Statement of Grant Usage certified by the Council's S151 Officer.
32. Non-compliance with the grant conditions and the sanctions in place. The grant conditions state clawback provisions (condition 20) shall be triggered in the event of non-compliance with grant conditions.
33. Progress Reporting and Information Return - reports are required within certain tight timescales and if not received on time, clawback provisions can be activated.
34. Compliance with distribution of fund deadlines which, if not complied with, is also linked to clawback provisions which will be triggered.

## **Financial Implications**

35. The Household Support Grant allocation for 2022/23 is £2.848m. This covers the period 1<sup>st</sup> April 22 to the 30<sup>th</sup> September 2022. The planned expenditure in the report has been allocated in line with the grant conditions. The grant will be paid to the Council in two instalments and distributed to residents between 01/04/22 and 30/09/22. The grant conditions require the Council to record how much has been spent on households with children, households with pensioners and households without children. Specifically, up to 33% must be allocated to households with children, 33% to pensioners and more than 33% to households with children. The funds will be released to the Council in arrears.
36. The expenditure will require close and regular monitoring to ensure that the percentage allocations as per the conditions are adhered to. Where expenditure is being allocated via the voucher scheme, not all vouchers are claimed and therefore regular uptake reporting is required and spend will be based on actual uptake. This will mean that subsequent decisions may be required to reallocate funding based on uptake performance.

## **Legal Implications**

(Provided by MP and ID on 16<sup>th</sup> May 2022 based on report that was circulated on 11<sup>th</sup> May 2022 timed at 15:19)

37. S.1 Localism Act (2011) provides the Council with the power to do anything an individual may do, subject to certain limitations. This is referred to as the

"general power of competence" (GPOC). A local authority may exercise the GPOC for its own purpose, for a commercial purpose and/or for the benefit of others. This GPOC provides sufficient power for the Council to enter into a grant funding agreement with the GLA.

38. Under s.111 Local Government Act (1972) local authorities may do anything, including incurring expenditure or borrowing which is calculated to facilitate or is conducive or incidental to the discharge of their functions.
39. This report constitutes a Key Decision (KD). A KD is defined as a proposal that involves expenditure/savings of £500,000 or above (including proposals phased over more than one year) and match/grant aided funding with a total of £500,000 or above; and/or which has significant impact on the local community in one or more wards.
40. The Council must ensure that all guidance available to it regarding this grant, is followed, at all times and it must further ensure **strict** compliance with:
  - (i) the Household Support Fund Grant Determination 2022 Letter no.31/3096 (duly signed for and on behalf of DWP by a senior civil servant and dated 20<sup>th</sup> April 2022) and;
  - (ii) those conditions stipulated in Annex B of the Letter.
41. The Council is expected to distribute monies to eligible recipients, from its own budget and Officers are directed to note this poses some risk. The grant will then be paid in arrears, to the Council, upon receipt (by DWP) of an acceptable 'Statement of Grant Usage', duly certified by the Council's s.151 Officer. Condition 10 (Annex B) outlines the requirements regarding this Statement of Usage and the Council must ensure strict compliance with the same to mitigate risk of non-payback of the grant.
42. Officers are directed to note risk associated with clawback provisions of Annex B (Condition 20). Should the Council breach any grant condition then, such clawback provisions are likely to be triggered.

The Household Support Fund guidance says that local authorities must have a clear rationale or documented policy/framework outlining their approach, including how eligibility is defined and how households access the scheme. The guidance also reminds local authorities of its Public Sector Equality duty and when considering how any support may help people facing severe financial hardship, any impact this may have on those with a characteristic protected under the Equality Act 2010. In addition, when developing a delivery framework, a local authority should ensure people are not disadvantaged or treated unfairly by the scheme. It is recommended that the local authority develop a published eligibility policy formulated by an equality impact assessment.

## **Workforce Implications**



43. There are no workforce implications from the proposals outlined within this report. The grant will be distributed via the existing workforce. Some administrative costs can be claimed, but Government expects these to be minimal to ensure the grant has maximum impact.

### **Property Implications**

44. There are no property implications from the proposals outlined within this report.

### **Other Implications**

45. It is not believed that there are other implications that need to be considered as part of the proposals outlined within this report.

### **Options Considered**

46. The options outlined within the report have been developed because they are believed to be the most beneficial method of distributing the grant. However, should any element of the proposed distribution be underutilised then alternative options will be considered and agreed.

### **Conclusions**

47. 2022 is expected to continue to be extremely challenging for those experiencing financial hardship. Rising food prices and increasing utility bills will place greater pressure on resident's finances and will result in many struggling to make ends meet this winter. The proposals outlined within this report set out how the Council believes the grant can be best used for the benefit of struggling residents.

48. It is believed that the distribution of the grant via these three themes will ensure that maximum impact is achieved.

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### **Appendices**

1. [DWP Guidance](#)
2. [DWP Launch Letter](#)
3. [DWP Grant Determination](#)
4. [DWP Delivery Plan](#)
5. [DWP M I Template](#)