

Scrutiny Homes Sub-Committee Supplementary Agenda



5. **Pre-Decision Scrutiny: Distribution of the Household Support Fund Grant** (Pages 3 - 40)

The Scrutiny and Overview Committee is asked: -

1. To note the report due considered by the Mayor at the Cabinet meeting on 7 December 2022.
2. To consider whether there are any recommendations or observation arising from the Sub-Committee's consideration of the report to the submit for the consideration of the Mayor at the Cabinet meeting.

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Agenda Item 5

REPORT TO:	Homes Sub-Committee 5 December 2022
SUBJECT:	Pre-Decision Scrutiny: Distribution of the Household Support Fund Grant
LEAD MEMBER:	Councillor Lynne Hale, Deputy Mayor & Cabinet Member for Homes
LEAD OFFICER	Susmita Sen, Corporate Director of Housing
PUBLIC/EXEMPT:	Public

ORIGIN OF ITEM:	Pre-decision scrutiny of reports due to be considered by the Mayor in Cabinet is one of the key roles for Scrutiny.
BRIEF FOR THE COMMITTEE:	The Scrutiny and Overview Committee is asked: - <ol style="list-style-type: none">1. To note the report due considered by the Mayor at the Cabinet meeting on 7 December 2022.2. To consider whether there are any recommendations or observation arising from the Sub-Committee's consideration of the report to the submit for the consideration of the Mayor at the Cabinet meeting.

1. DISTRIBUTION OF THE HOUSEHOLD SUPPORT FUND GRANT

- 1.1. At the Cabinet meeting to be held on 7 December 2022 the Executive Mayor, Jason Perry, will be considering the 'Distribution of the Household Support Fund Grant report which can be found attached at Appendix A.
- 1.2. The report is presented to the Homes Sub-Committee in advance of the Cabinet to give the opportunity for pre-decision scrutiny. The Sub-Committee is asked consider whether there are any recommendations or observations arising from its consideration of the report that it wishes to submit for the consideration of the Mayor at the Cabinet meeting.

CONTACT OFFICER:

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Appendices

Appendix A: Cabinet Report – Distribution of the Household Support Fund Grant

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For General Release

REPORT TO:	CABINET 7 December 2022
SUBJECT:	Distribution of Household Support Fund Grant
LEAD OFFICER:	Susmita Sen, Corporate Director of Housing
CABINET MEMBER:	Cllr Hale, Deputy Mayor Cllr Cummings, Finance Cllr Gatland, Children and Young People Cllr Hopley, Health and Adult Social Care
WARDS:	All
FINANCIAL IMPACT This report concerns the distribution of £3,013,689.49. This sum is entirely grant funded by the Department of Work & Pensions (DWP) so has no direct impact on existing Council budgets.	
KEY DECISION REFERENCE NO.: 7222EM This is a Key Decision as defined in the Council's Constitution. The decision may be implemented from 1300 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors	

1. RECOMMENDATIONS

The Executive Mayor in Cabinet is recommended to:

- 1.1 Accept the Department for Work and Pension Household Support Fund (HSF) allocation of £3,013,689.49 as set out in this report and make associated budget adjustments.
- 1.2 Approve the proposed allocation of the HSF in line with Appendix A to this report and the administration of the fund. This covers a local eligibility framework, an approach to enabling access to grant funding that supports households most in need, and the development of a local delivery approach.
- 1.3 Approve the proposed phased roll out approach set out in paragraph 7 of the report.

2. EXECUTIVE SUMMARY

- 2.1 There has been three Household Support Fund allocations since October 2021. Croydon fully spent the two previous grant allocations and supported 66,791 households.
- 2.2 This Household Support Fund is for **£3,013,689.49** as allocated by the Department of Work & Pensions (DWP) and covers the period 1st October 2022 to 31st March 2023. The fund is ring-fenced. However, the DWP will pay the fund in arrears upon receiving financial returns in January & April 2023.
- 2.3 To mitigate financial risks to the Council, a robust monitoring and reporting system will be put in place to ensure the right funding goes to those most in need. The Council will monitor who gets funding ensuring a robust approach to ensure the households in genuine need get the support required.
- 2.4 Service will be responsible for recording and tracking their day to day spend from the fund. This will be to allow monitoring of what the fund is being spent on (DWP return) and how much is left in each areas budget. Work will be done with individual services to establish the best practice for reporting, based on how and what they are awarding.
- 2.5 Although all services will be responsible for tracking their own spend, they will need to supply monthly spend reports to the Single Point of Contact (SPOC). The SPOC will be responsible for over-seeing and monitoring the fund and it's spend as well as completing and returning spend information.
- 2.6 To help mitigate the risk of underspend the monitoring process will also identify underspending in services that can be used and other areas.
- 2.7 The above will ensure that:
 - a) The data collected will be sufficient for the DWP MI returns to ensure the monies is paid back
 - b) There is no overspend
 - c) The fund is utilised with maximum efficiency
 - d) The Council can track and report the number of residents supported and what support they received

3. DETAIL

- 3.1 There are some changes to the criteria for this Household Support Fund:
 - Ringfenced spending for any cohort of residents has been removed.
 - A requirement for all Authorities to operate at least part of their scheme on an application basis so that residents have the opportunity to come forward to ask for support. Croydon will continue to offer this option.
 - An expectation of Authorities to particularly consider those groups who may not have benefitted from any of the recent cost of living support

3.2. The proposed allocation will cover the following areas:

	Estimated spend	% Of allocation
Food	£ 1,752,735.31	58%
Fuel	£557,504.14	18%
Wider Essentials not linked to food and fuel*	£369,600	12%
Housing Cost	£161,281	5%
Essentials linked to food and fuel*	£128,001.04	4%
Administration	£44,568	1%
Total	£3,013,689.49	

The remaining 1% to cover administration fees

*Full details can be found in the guidance document attached in appendix 1

- 3.3 58% of the allocation will be spent on food to support families over the school holiday. 18% is allocated to support families with fuel bills and 12% of the fund will be targeted at residents in need of wider essentials. The approach will be similar to the previous £150 rebate support with council tax bills as it will free up income that can then be used to cover utility bills.
- 3.4 There was a greater focus on supporting pensioners under the last scheme but this requirement has been removed under this scheme. This is because the government has set up a wide range of support to help with fuel and this includes a one-off £300 Pensioners Cost of Living Payment which they will receive as part of the Winter Fuel Payment. In addition, pensioners can also receive support from the Household Support Fund through the direct application process. This also applies to those over the age of 75.
- 3.5 The grant allocation proposal replicates the same approach as before which worked, ensuring the full grant allocation was spent and financially vulnerable households supported. The approach is based on having both an application process and targeted work to increase access to those who need it. The targeted approach will be based on a set eligibility criteria as well as at the discretion of the services.
- 3.6. Based on discussion with a number of services, the requirement of the fund and the previous fund, below is a summary of the proposed allocation.

Service	Support	% Of allocation
Education	£15 food voucher for families in receipt of Free Schools Meals (FSM) for 5 weeks as well as a discretionary pot to cover food for families not in receipt of FSM	53%
Discretionary Support Team	Administration of direct applications from residents.	17%
Housing	Tenants in council and temporary accommodation who pay for utilities directly to the Council through service charge. In addition, £150 will be awarded to tenants living in the wards with the highest fuel poverty in the borough.	12%
Revenues	Target households who need help with council tax bills	10%
Children Social Care	Support vulnerable families with health conditions where a warm home can contribute to improvement in their condition and those who require assistance with essential goods	2%
Regina Road Residents	Residents living in the three tower blocks on Regina Road paying high heating bills due to the type of heating systems in the properties will be supported to cover their fuel cost over the winter.	2%
Healthy Homes Team	In addition to financial support, Healthy Homes Team working with other services will develop information to help residents to be more energy efficient.	2%
Administration	Staffing cost	1%

3.7 The detail of the apportionment of the fund is as set out in Appendix A of this report.

4. HOW THE FUND IS PAID

4.1 We will be paid in arrears following the below management information (MI) returns being submitted and endorsed by our S151 officer.

- Interim MI return
 - Covering 01 September 2022 – 31 December 2022
 - Deadline: 25 January 2023
- Final MI return
 - Covering 01 September 2022 – 31 March 2023
 - Deadline: 28 April 2023

4.2 As payments are in arrears the funds will be required from the council upfront and reimbursed by Department of Work and Pensions (DWP) at a later date. This poses a financial risk to the council if the DWP do not reimburse the funds. Reimbursement is due to the DWP being satisfied with the returned MI and as stated in the guidance payment can be delayed or refused.

5. COMMUNICATION

5.1 All services receiving grant money are being met with to discuss proposal

and plan. Conversations will continue to ensure that the services are ready when the fund is made available. There will be broad communication with the voluntary and charity sector.

- 5.2 To ensure that residents are made aware of the Household Support Fund information will be sent to 3rd party organisations that engage with vulnerable residents. This will include but not limited to Job Centre Plus, Age UK, Family Justice Centre and South West London Law Centre.
- 5.3 The Croydon Council web pages has been updated with a Household Support Fund webpage with details of the fund and how to apply. Awareness will also be raised internally with communication being sent out to all front facing service about the fund and how to apply.

6. ADMINISTRATION AND TRACKING

- 6.1 The same approach as last time will be taken to administrate and track the fund.
- 6.2 Service will be responsible for recording and tracking their day to day spend from the fund. This will be to allow monitoring of what the fund is being spent on (DWP return) and how much is left in each areas budget. Work will be done with individual services to establish the best practice for tracking and reporting, based on how and what they are awarding. This may include but not limited to; getting reports being created or using existing systems that are already in place. Many services have experience in administrating the grant funding and have established auditing and reporting mechanism.
- 6.3 Although all services will be responsible for tracking their own spend, they will need to supply monthly spend reports to the SPOC. The SPOC will be responsible for over-seeing and monitoring the fund and it's spend as well as completing and returning MI.
- 6.4 Due to the delay in going live there is a risk that not all the funds will be spent by March 2023. We will be using many of the services and individuals involved in the last Household Support Fund and using their experience and knowledge to mitigate this and ensure the full allocation is spent by March 2023. To help mitigate the risk of underspend the monitoring process will also identify underspending in services that can be used in other areas. There may also be opportunities to amend the schemes by increasing the awards if take up is low. This approach has proven successful in the past and was the reason Croydon was able to spend the full allocation in a few months. Flexibility will be crucial to getting the Household Support fund spent before March 2023.

7. PROPOSED PHASED ROLL-OUT APPROACH

- 7.1 It is proposed to roll out the above proposal in two stages. The first will be to provide emergency or time sensitive support by making a total of £169,568 available immediately. Of which £125,000 will be made available to the Discretionary Support Team immediately with the agreement that they can start taking direct applications for food and fuel only. A further £44,568 to cover cost to recruit 2 Business Support Officers to support the applications process to avoid delays in recruitment.

- 7.2 The second phase would be to proceed with the award of the remaining funds as set out in Appendix 1 with the agreement of the Mayor.
- 7.3 A robust monitoring process will be in place to monitor and ensure maximum benefits to the residents and no financial risk to the council. The monitoring process will be developed and worked on with services to ensure that the correct information is being captured and reported.

8. CONSULTATION

- 8.1 Appendix A was drawn up in consultation with all relevant departments. It has been discussed with all Corporate Directors.

9 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 The Household Support Fund will be made available to Local Authorities with the purpose of providing targeted financial support for residents. Croydon has been awarded £3,013,689.49 to be used between 1st October 2022 and 31st March 2023. This is ring fenced grant income and there is no risk to the GF budgets of the Council.

1 Revenue and Capital consequences of report recommendations

This is ring fenced grant income and there is no risk to the GF budgets of the Council.

2 The effect of the decision

Appendix A sets out the planned areas of spend to meet the requirements of the grant.

3 Risks

Delays in implementing the framework could result in the full fund not being spent within the designated time period.

4 Options

Appendix A sets out the options for spend that meet the requirements of the grant.

5 Future savings/efficiencies

Not applicable, this is Grant income for specified usage within the current financial year.

10. LEGAL CONSIDERATIONS

- 10.1 Grant funding for the Household Support Fund will be paid to the Council by the Minister under Section 31 of the Local Government Act 2003. The grant may be paid on such conditions as the Minister may determine, and may include

provision as to the use of the grant, and the circumstances in which the whole or part of the grant must be repaid.

- 10.2 The Minister has issued Guidance entitled “Household Support Fund (1 October 2022 to 31 March 2023): final guidance for county councils and unitary authorities in England”, updated 24 October 2023. It is assumed that it will be a conditions of the grant under Section 31 that authorities should have regard to the Guidance, but in any event it is reasonable to assume an implied, if not specific duty on the Council to have regard to the Guidance. This means the Guidance must be singled out for special mention, and is a mandatorily relevant factor to which due and specific consideration must be given, to which some weight must be attached, and which must not be marginalised. This duty does not however go so far as to make the Guidance an exclusive consideration, and there is liberty to deviate from the Guidance on admissible grounds and for good, sufficient and articulated reasons.
- 10.3 The Council’s general power of competence, “to do anything that individuals generally may do”, in Section 1 of the Localism Act 2011 is sufficient to cover the arrangements for receiving and making payments of the grant as set out in this report.
- 10.4 In accordance with its general duties to act reasonably and proportionately, the Council must have a clear policy or framework outlining its general approach, including in relation to how eligibility will be defined, and how households will access the Fund, and this is set out in the Allocation Proposal in Appendix A.

Approved by Sandra Herbert, Head of Litigation & Corporate Law, on behalf of the Director of Legal Services and Monitoring Officer.

11. HUMAN RESOURCES IMPACT

There is no immediate HR impact in regard to this report. If any should arise these will be managed under the Council’s policies and procedures.

Approved by Jennifer Sankar, Head of HR Housing Directorate & SCRER Directorate, for an on behalf of, Dean Shoesmith, Chief People Officer.

12. EQUALITIES IMPACT

The Council, in carrying out their functions must give due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The supporting Equality impact assessment has addressed negative impacts with mitigation on specific groups which will be to promote the fund to ensure residents with financial need from the protected groups can access it.

Approved by: Gavin Handford, Director of Policy, Programmes & Partnerships

13. ENVIRONMENTAL IMPACT

13.1 There is no identifiable environmental impact from this report.

13.2 Approved by Susmita Sen, Corporate Director, Housing

14. CRIME AND DISORDER REDUCTION IMPACT

15. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

15.1 The apportionment of the grant as set out in Appendix A has been subject to discussion with all relevant officers and is based on the Council's priorities, assessed demand, and our ability to distribute the grant in an effective manner.

16. OPTIONS CONSIDERED AND REJECTED

16.1 The Council could choose not to spend this grant. However, to do so would be detrimental to agreed priorities. Various distributions were considered, with the final choice being based on the criteria set out in 11.1 above.

17. DATA PROTECTION IMPLICATIONS

17.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

Data will be shared with Family Fund when the awards are made, as done under the previous Household Support Fund.

HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

Yes, for previous Household Support Fund, renewed version in progress.

Approved by: Beatrice Cingtho-Taylor, Head of Temporary Accommodation

CONTACT OFFICER: Natasha Jebbison

APPENDICES TO THIS REPORT

Appendix A: Household Support Fund Proposal October 2022 – March 2023

Appendix B: Equality Analysis Form – Household Support Fund – October 2022 – March 2023

BACKGROUND PAPERS - LOCAL GOVERNMENT ACT 1972

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Household Support Fund

October 2022 – March 2023

Allocation Proposal

November 2022

Background

In October 2021 the Government announced the Household Support Fund (HSF). The fund's aim was to support vulnerable residents across the country over the winter. Between October 2021 and September 2022, Croydon supported 66,791 residents with food, fuel, white goods, beds, wider essentials, and housing costs.

With the rise in energy cost and cost of living going up the Government recognised the need for the support to continue; and on 30th September 2022, the government announced the Household Support Fund would be extended for the period 1st October 2022 to 31st March 2023.

As with the previous fund, the purpose is to provide targeted financial support for vulnerable resident over the next six months. Croydon has been awarded £3,013,689.49 to be used between 1st October 2022 and 31st March 2023.

Croydon has over 31,000 low-income households (these are households that get some sort of benefit from us, so we have all of their details). 7,028 of these households have income levels below their estimated costs.

- If costs go up £50 a month for everyone then this increases by 705.
- If costs go up £100 a month, then it increases by 1,108.
- If costs increase by £200 a month, then it increases by 2,797.

Croydon has been supporting residents with government funding while they manage with financial struggles due to covid, changes in benefits and now the fuel & cost of living crisis. Over the past 2 years Croydon has provided emergency support using the Household Support Fund as shown in the table below.

Direct applications for food & fuel

	October 2021 – March 2022		April 2022 – September 2022	
	Spend	%	Spend	%
Food	£119k	23%	£102k	21%
Fuel	£163k	31%	£271k	57%
Total	£282k	54%	£373k	78%

Although there has been a slight decline in direct applications for food, there has been a notable increase in support required for fuel. This is expected to increase with the winter months approaching.

Information in Appendix 2 shows the highest level of fuel poverty is in the following wards:

- Waddon
- New Addington
- Broad Green
- Selhurst
- Shirley North
- South Norwood
- Thornton Heath
- West Thornton
- Norbury & Pollards Hill

The extension of the Household Support Fund will help to address the financial pressures that these residents are facing.

Criteria of the Grant

The emphasis remains on supporting households with fuel and in particular fuel debt. However, the fund can also be used for the following:

- Essential costs linked to energy and water bills (i.e., sanitary products, warm clothing, soaps, blankets)
- Wider essential costs not linked to energy & water (i.e., bills, clothing, essential transport cost)
- Housing Costs in exceptional cases of genuine emergency. (See guidance for full details)
- Reasonable administrative costs

There are also some other changes to this Household Support Fund:

- No ringfence of any proportion of funding for any particular cohort of people,
- A requirement for all Authorities to operate at least part of their scheme on an application basis so that residents have the opportunity to come forward to ask for support. Croydon will continue to offer this option.
- An expectation of Authorities to particularly consider those groups who may not have benefitted from any of the recent wider support available to address cost of living including the:
 - Energy Bills Support Scheme and the equivalence package confirmed on 29 July 2022
 - Council Tax Rebate and the associated £144 million Discretionary Fund
 - Cost of Living Payments for those on means tested benefits
 - £150 Disability Cost of Living Payment
 - One-off £300 Pensioner Cost of Living Payment (through the Winter Fuel Payment)

As the schemes listed above do not cover everyone, Authorities have been asked to consider prioritising those households, who (for example):

- are eligible for but not claiming qualifying benefits
- become eligible for benefits after the relevant qualifying dates
- are in receipt of HB only
- are ordinarily eligible for benefits but who had a nil award in the qualifying period due to, for example, a fluctuation in income
- have fuel costs but who cannot access the £400 of energy support from the Energy Bill Support Scheme or the equivalence package confirmed on 29 July 2022

This list is not exhaustive and there may be some households that are affected by rising costs despite being in receipt of the government support available who will benefit from the support provided through the Household Support Fund

Enclosed is the final launch letter, final grant determination and final guidance for further details.



FINAL Household
Support Fund Launch



FINAL Grant
Determination - Hous



FINAL Household
Support Fund Guidan

Internal Stakeholders

Part of the success of the previous fund was due the collaborative work across the council. Although there are some changes to the criteria of the grant, the approach for delivery will remain the same.

Like before, collaborative work is being done with relevant services who can identify the residents that would most benefit from the fund. Conversations are taking place with these services to identify the needs of residents and how they could use the fund to support them.

Services that have been identified:

- Education
- Discretionary Support Team
- Revenues
- Housing
- Healthy Homes

(This is not an exhausted list and as with previous fund may change as discussions continue.)

These services will be key to administrating the fund and ensuring that we support as many residents as possible and spend the fund in the given time.

In addition to the services mentioned above all front facing service will be crucial in promoting the fund among residents to maximise take up between now and March 2023.

External stakeholders

Under the grant guidance councils can choose to work with multiple organisations to deliver the fund. In the past Croydon has chosen to work with Schools to deliver part of the fund to families in the borough (more detail provided below). This approach has proven successful as schools are typically well-placed to know the families most in need and for many households their school is the first point of contact.

There will also be engagement with residents, schools, charities, and other 3rd party organisations that work with vulnerable residents to promote the support that will be available to support residents in accessing the fund.

Grant allocation proposals

The proposal is for Croydon to replicate the same approach as before and have both an application process and do targeted work. Some of the targeted work will be based on a set eligibility criteria and others will be at the discretion of service, but all residents targeted will be assessed as financially vulnerable. Services will identify residents through the work they are doing and access discretionary funds to provide support. This approach has worked in the past.

Based on discussion with a number of services, the requirement of the fund and the previous fund, below is the full proposed allocation.

Education

Proposed allocation

£1,610,000

Breakdown of allocation

- £1,340,000 to be given to schools to fund 5 weeks of £15 food vouchers for families in receipt of Free School Meals (FSM)
- £270,000 to be given to schools to provide discretionary awards for food for families not in receipt of Free School Meals (FSM)

Overview

The allocation has been agreed with Education. Croydon has previously worked with schools to administer funds to support families over the school holidays.

The Household Support Fund will be given to schools, enabling them to offer a £15 a week supermarket vouchers for each FSM pupil, for 5 weeks school holidays. The amount per pupil has been determined by the 2 factors below:

- The Household Support Fund is awarded to support all residents with more emphasis on food. This means the budget is limited. Providing FSM holiday vouchers currently costs £268,000 per week.
- Each school also receives a discretionary pot of funding (based on a percentage of their FSM total). This allows schools to use their discretion to offer additional support that is most needed in their school and to the families most in need of support. This must be used to offer food support and is often used by schools to offer additional vouchers, food hampers or free meals to those most in need (not just FSM).

The above means that all FSM pupils will receive a total of £75 food voucher.

Although most of the allocation will be used to support children entitled to Free School Meals it is essential that support is being provided to families not in receipt of FSM. Previous experience has highlighted a need to support families on the cusp of poverty that are unable to access other funds due to benefit eligibility. The discretionary element of the award will help to address this issue and enable schools to work with families that traditionally have not been able to access support. It will be the responsibility of the schools to decide which families are entitled to the discretionary fund. However, it is recognised that this fund is limited and may not be enough. To help tackle this, schools will be made aware of the application channel of the Household Support Fund. Families can also be signposted to make a claim to the council (Discretionary Support Team) where schools are unable to assist.

Discretionary Support Team (direct applications)

Proposed allocation

£ 527,340.49

Breakdown of allocation

- 477,340.49
 - £286,404.39 for fuel
 - £119,335.06 for food
 - £71,601.04 for essential white goods
- £50,000 for food and fuel for carers

Overview

In addition to targeted work, an application process will be set up. Residents will be able to make direct applications to the council for help with food, fuel & essentials linked to fuel/food:

- Fridge/freezer
- Cooker
- Microwave (where a cooker is not suitable)
- Boiler repairs

There will be some changes to the previous scheme to help manage demand and support more residents. White good applications will be restricted to one white good and the Fund will be targeted to cover the following:

- Fuel – 60%
- Food – 25%
- Essential white goods – 15%

This is to ensure that the scheme meets the grant criteria by spending a large proportion of the fund on fuel and food.

The scheme will not be assessed based on eligibility for benefits but on affordability. Light touch affordability check will be done to ensure that applicants do not have the means to afford these items themselves.

Awards will be administrated through Family Fund as we have done with the previous funds. Family Fund is a provider that works with suppliers to purchase and supply residents with the items they have been awarded. Awards are cashless but the system does have the flexibility to make cash awards where needed. Family Fund is a tried and tested partner that has been working with the Discretionary Support Team for many years to supply residents with support under the:

- Croydon Discretionary Support scheme
- Covid Winter Grant
- Covid Local Support
- Household Support Fund.

Using Family Fund will allow us to get the fund up and running quickly.

The Discretionary Support Team will administrate the application process. The team has a great deal of experience administrating discretionary funds for the above. The team have knowledge and experience:

- Administrating limited funds
- Ensuring that the funds are spent within given time frames
- Conducting affordability checks on applications
- Safeguarding funds against fraudulent claims

The team will also work with residents in receipt of Discretionary Housing Payment to provide additional support through the fund to help provide financial stability.

As well as direct applications the Discretionary Support Team will support residents referred by 3rd party organisations including but not limited to Job Centre Plus, South West London Law Centre, Age UK, Family Justice Centre, Stepping Change, Alzheimer's society, Mind.

Under the last Household Support Fund, carers were identified as one of the groups that are unable to increase their income to meet the increasing energy costs. As there are no wider government support targeted at this group, £50,000 has been allocated to support

carers who make direct applications for food and fuel. This will be publicised through the organisations that work with carers to raise awareness of the Household Support Fund.

Housing

Proposed allocation

£366,781

Breakdown of Allocation

- £200,000 to provide one off payment of £400 for residents under 65 paying utilities directly to the council
- £55,500 to provide an addition £150 to residents in the wards with the highest fuel debt
- £111,281 as a discretionary pot to support residents in council accommodation with rent arrears and fuel debt

Overview

There are currently 500 households under 65 in emergency/temporary and Council accommodation who are liable for utility services charges. As these residents pay their utility bills directly to the Council, they will not qualify for the Energy Bill Support Scheme or the One-off £300 Pensioner Cost of Living Payment (through the Winter Fuel Payment). £200,000 will provide a one off £400 payment in line with the amount awarded under the Energy Bill Support Scheme.

A further £55,500 will be made available to provide an additional £150 payment to the households that are living in the wards with the highest fuel debt who pay utility charges to the council.

£111,281 will be used as a discretionary pot that can support residents in emergency and temporary accommodation who are struggling with rent payments and unable to get support through other schemes.

The payment will be cashless and made directly to the residents rent accounts.

Revenues

Proposed allocation

£300,000

Overview

As with the previous Household Support Funds Revenues will target residents that need support and help towards their council tax bills to assist vulnerable residents who are struggling with current year Council tax bill. Residents will be identified by the Revenues team and an award can be made to help reduce the bill.

Children Social Care

Proposed allocation

£65,000

Overview

The allocation will be used to support vulnerable families. This may include but not limited to:

- Residents with health conditions where a warm home can contribute to improvement in their conditions
- Residents known to the above service who require assistance with essential goods

The approach will be similar to the previous Household Support Fund. Children Social Care will have access to the fund to support residents they identify. The service will use their discretion to award the fund in line with grant guidance. This approach will ensure that residents who need this support are not excluded.

Regina Road Residents' Fund

Proposed allocation

£50,000

Breakdown of allocation

- £22,000 for fuel
- £8,250 on Argos vouchers for essentials linked to fuel
- £19,750 for discretionary support

Overview

There are three tower blocks on Regina Road with residents paying high heating bills due to the type of heating systems in the properties. The proposal is to provide a one-off payment of £200 to support these residents with fuel cost over the winter. This will be an additional payment to the £400 Government's Energy Bill Support Scheme.

Residents will also be awarded a one off £75 Argos voucher to purchase additional essential items such as warm bedding.

There are currently 110 residents who would be eligible for this support. These residents will be notified in writing of the total award of £275 that they will receive. Taking this approach will ensure that only the residents who are occupying the building receive this targeted support.

It is also proposed that a discretionary allocation be made available to cover other associated emergency costs based on individual needs or circumstance. The awards will be made at the discretion of the Service.

Healthy Homes (Energy efficiency advice)

Proposed allocation

£50,000

Overview

In addition to financial support, Healthy Homes will work with Housing and the Discretionary Support team to develop information to help residents to be more energy efficient.

The information packs will cover advice, guidance, and signposting for energy cost savings. The information will be made available on the Household Support webpage for ease of access in addition to services circulating it where possible. A publicity campaign will also be targeted to the residents living in and around the areas where there is a high percentage of households in fuel poverty.

Admin costs

Proposed allocation

£44,568

Breakdown of allocation

- £35,568 to cover two grade 6 Business Support Officers for 6 months.

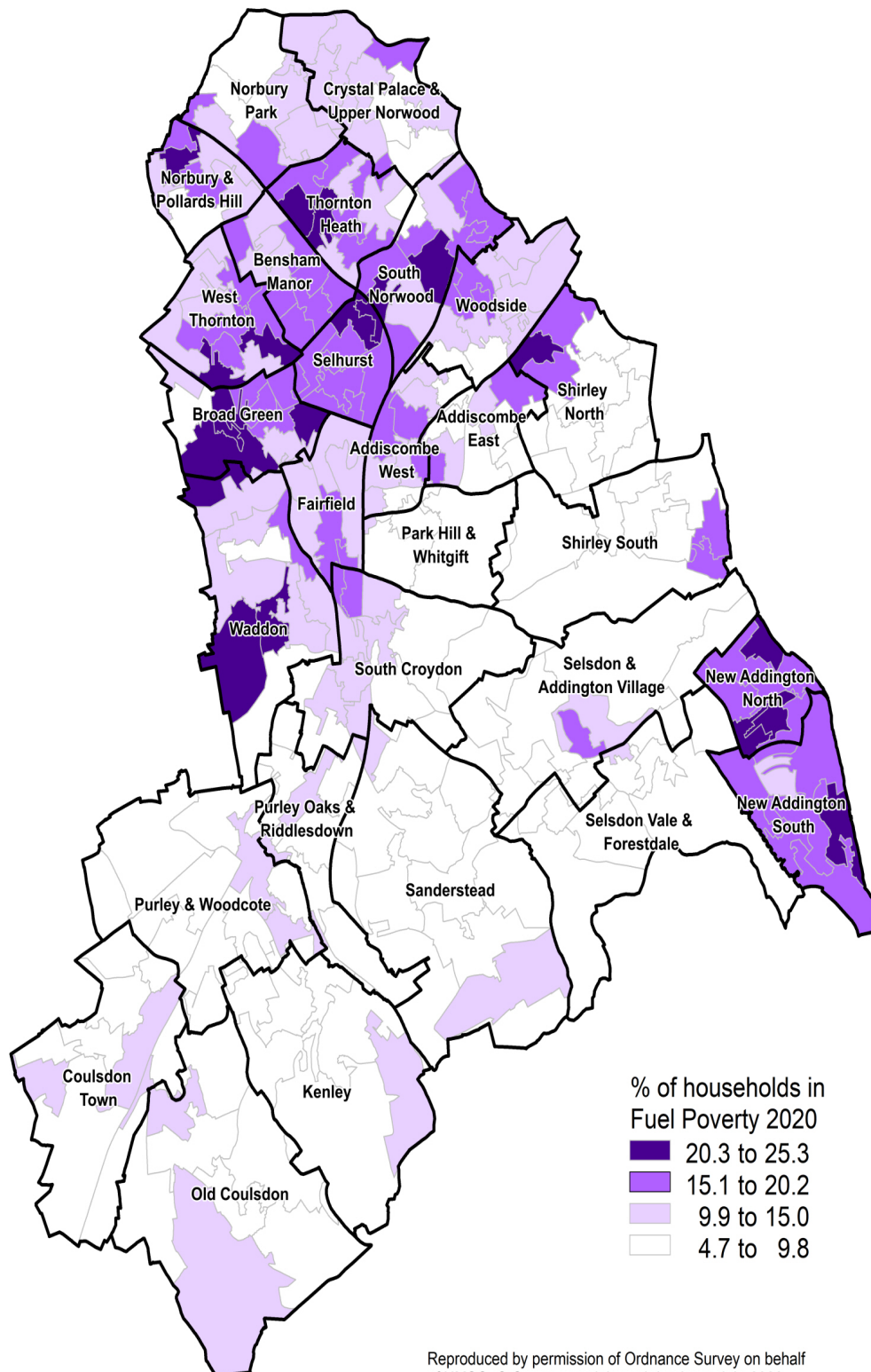
- £9,000 to pay for any transactional fees incurred when purchasing food, fuel, and goods through Family Fund.

Overview

Due to the scope and publicity of this fund it is anticipated that there will be additional demand on the Discretionary Support Team. During the last Household Support Fund, the team received a high volume of 1,551 direct applications which resulted in a backlog and this channel was closed before the end of the period. To address this, the fund will be used to recruit the additional staff at the outset.

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Percentage of households in Fuel Poverty 2020



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Equality Analysis Form

Delivering for Croydon

CROYDON
www.croydon.gov.uk

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Housing
Title of proposed change	Household Support Fund
Name of Officer carrying out Equality Analysis	Natasha Jebbsion

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

The Department of Work and Pensions (DWP) has announced the Household Support Fund (HSF) to support vulnerable residents between 1st October 2022 and 31st March 2023.

Overview and aim of the fund

Croydon has been allocated £3,013,689.49.

The primary aim of the fund is to reduce food & fuel poverty between October and March, by providing residents with access to food and fuel who may otherwise go without. Support will also be provided for other essentials associated with food & fuel. This includes but isn't limited to, fridge, freezers, cookers, microwave and boiler repairs. Where needed the fund will be used to support with wider essentials that can help reduce poverty over the next 6 months including help with other bills, clothing & one-off housing cost (where no other support is available).

The fund also empathises the need to support residents who will not be eligible for wider government support being provided this winter. This includes:

- Energy Bills Support Scheme and the equivalence package confirmed on 29 July 2022
- Council Tax Rebate and the associated £144 million Discretionary Fund
- Cost of Living Payments for those on means tested benefits
- £150 Disability Cost of Living Payment
- One-off £300 Pensioner Cost of Living Payment (through the Winter Fuel Payment)

Below are details on how Croydon aims to achieve the above.

Targeted work

Croydon will target vulnerable residents that will be in eligible for Household support fund. This will be achieved by using internal & external services.

Internally

A total of £781,781 has been allocated to support vulnerable residents, in particular those ineligible for wider government support and households in financial difficulties as they will struggle the most with meeting the increasing cost of living. A collaborative piece of work is being done across Children Social Care, Housing and Revenues to identify these residents. The fund will help bolster the support they already provide to ensure that fuel & food poverty can be reduced. Services have already begun to identify residents and will continue to do so between now and March.

Externally

The fund will not be allocated to community groups and other third-party organisations. However, we will be working with them to promote the scheme, especially among hard-to-reach groups such as pensioners.

Schools

To tackle food poverty among children during the school holidays £1,340,000 has been allocated to Croydon schools. Schools will provide food during 5 weeks of school holidays for 17,866 families in receipt of free school meals. An additional £270,000 will be provided to schools to provide discretionary awards for families not in receipt of Free School Meals.

Applications process

To ensure that Croydon can reach as many residents as possible with the Household Support Fund £477,340.49 has been made available for direct applications and referrals from other external and internal services. The Discretionary Support team will administrate this using their knowledge and past experience to maximise the fund and support the right applicants.

3. Impact of the proposed change


Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	£1,610,000 will provide food for a total of 21,439 children across the borough during school holidays.	Unlike previous funds there is no ring-fencing for age. As the fund allocation focuses on families in receipt of free school meals there is risk that adults with no/adult children may not access the fund in	Information provided by the education department and schools  Copy of Conversation with Education re HSF

		the same way that children would. the application process aims to pick up this group of people however as it isn't targeted some residents may not be aware of the support and access it.																																																			
Disability	Although the fund does not target residents with disabilities there is wider support being provided by the government through the Disability Cost of Living Payment as well as the Energy Bill Support Scheme.	There is not targeted work and the DCLP is for residents in receipt of certain disability benefits. This could marginalise residents not in receipt of these benefits. The discretionary element of the fund will support those with disabilities who are financially struggling. The application process will also use discretion for residents who health conditions require more heating over the winter	<div>Direct.gov</div> <div>Observatory http://www.croydonobservatory.org/</div> <table><tr><th>Age</th><th>Day-to-day activities limited a lot</th><th>Day-to-day activities limited a little</th><th>Day-to-day activities not limited</th><th>All categories: Long-term health problem or disability</th></tr><tr><td>Age 0 to 15</td><td>1,303</td><td>1,772</td><td>75,952</td><td>79,027</td></tr><tr><td>Age 16 to 24</td><td>842</td><td>1,286</td><td>39,839</td><td>41,967</td></tr><tr><td>Age 25 to 34</td><td>1,244</td><td>1,988</td><td>52,903</td><td>56,135</td></tr><tr><td>Age 35 to 49</td><td>3,992</td><td>5,277</td><td>72,582</td><td>81,851</td></tr><tr><td>Age 50 to 64</td><td>5,179</td><td>6,766</td><td>46,597</td><td>58,542</td></tr><tr><td>Age 65 to 74</td><td>3,421</td><td>4,937</td><td>14,512</td><td>22,870</td></tr><tr><td>Age 75 to 84</td><td>4,030</td><td>4,612</td><td>6,180</td><td>14,822</td></tr><tr><td>Age 85 and over</td><td>2,482</td><td>1,496</td><td>1,038</td><td>5,016</td></tr><tr><td>Total All Ages</td><td>22,493</td><td>28,134</td><td>309,603</td><td>360,230</td></tr></table>	Age	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited	All categories: Long-term health problem or disability	Age 0 to 15	1,303	1,772	75,952	79,027	Age 16 to 24	842	1,286	39,839	41,967	Age 25 to 34	1,244	1,988	52,903	56,135	Age 35 to 49	3,992	5,277	72,582	81,851	Age 50 to 64	5,179	6,766	46,597	58,542	Age 65 to 74	3,421	4,937	14,512	22,870	Age 75 to 84	4,030	4,612	6,180	14,822	Age 85 and over	2,482	1,496	1,038	5,016	Total All Ages	22,493	28,134	309,603	360,230
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Sex	In the ward identified by Policy and Practice (PiP) as having the highest number of households most at risk there is a high amount of male claimants compared to female despite being smaller in population. The fund will	These groups are not targeted and their engagement will be subject to them apply for the fund.	<div>Observatory http://www.croydonobservatory.org/</div> <div>9.6% of Men & 8.2% of women in Croydon are unemployed. 7,635 men & 9,855 women are claimants .</div>																																																		

	provide additional financial support to these residents.		
Gender Reassignment Identity	We do not have access to this data and cannot assess the impact.		
Marriage or Civil Partnership	43% of Croydon's residents are married or in a Civil Partnership. Of the 43%, 21% live in the wards identified by PiP as being at most risk. The fund will provide support to this cohort of residents.		<p>Observatory http://www.croydonobservatory.org/</p> <p>43% of Croydon's residents are married or in a Civil Partnership. Of the 43%, 21% live in the wards identified by PiP as being at most risk</p>
Religion or belief	All support provided will ensure the beliefs of different cultural or religious groups about food is taken into consideration.		<p>We do not have the data on financial stability among different religious groups so we are unable to assess the impact. However below is the breakdown of religious beliefs across Croydon.</p> <p>Buddhist - 0.7% Christian - 56.4% Hindu – 6% Jewish - 0.2% Muslim - 8.1% Sikh - 0.4% Other religion - 0.6%</p> <p>Observatory http://www.croydonobservatory.org/</p>
Race	The fund will provide financial support to those residents across the borough in need of support.		<p>Policy and practice tool https://liftdashboard.co.uk/</p> <p>Observatory http://www.croydonobservatory.org/</p> <p>53% of Croydon's residents are BAME of this 35% live in the wards identified by PiP as having the highest number of households at risk. The BAME population makes up 73% of those 5 wards.</p>

Sexual Orientation	The fund will provide financial support to those residents across the borough in need of support.	The data does not include residents not in a registered same-sex civil partnership. Work will need to be done to ensure that the fund is published to residents not in registered same-sex civil partnership	Policy and practice tool https://liftdashboard.co.uk/ Observatory http://www.croydonobservatory.org/ 0.3% of Croydon residents are in a registered same sex civil partnership, of which 18% live in the wards identified by PiP as having the highest number of household's at most risk.
Pregnancy or Maternity		There is targeted work for children over 5 but there is no targeted work for expected mothers and mothers with new born	Observatory http://www.croydonobservatory.org/ - 6.8% of Croydon population is aged 0-4 years old - 6.8% of Croydon population is aged 0-4 years old <u>Early years 0- 5 years</u> % of male children achieving a good level of development - 69 % of female children achieving a good level of development- 80

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	3	2	6
Disability	2	2	4
Gender	2	2	4
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

☒

Eliminating unlawful discrimination, harassment and victimisation

☐

Fostering good relations between people who belong to protected characteristic groups

☐

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	There will not be any targeted work for residents. There is not targeted work and the DCLP is for residents in receipt of certain disability benefits. This could marginalise residents not in receipt of these benefits. The discretionary	Work will be done to raise awareness of the fund with 3 rd party organisations that work with residents with a disability. Residents will be able to apply for support through the Discretionary Support team.	Natasha Jebbison	16/12/22

Equality Analysis

	element of the fund will support those with disabilities who are financially struggling.	The application process will also use discretion for residents who health conditions require more heating over the winter.		
Race		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Sex	These groups are not targeted and their engagement will be subject to them apply for the fund.	To maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Gender reassignment		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Sexual orientation	The data does not include residents not in a registered same-sex civil partnership.	Work will need to be done to ensure that the fund is published to residents not in registered same-sex civil partnership. To maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Age	There will be no targeted work for residents not known to Education. Unlike previous funds there is no ring-fencing for age. As the fund allocation focuses on families in receipt of free school meals there is	Work will be done to raise awareness of the fund with 3 rd party organisations that work with older people and organisation that support young people. Residents will be able to apply	Natasha Jebbison	16/12/22

Equality Analysis

	risk that adults with no/adult children may not access the fund in the same way that children would.	for support through the Discretionary Support team. The application process aims to pick up this group of people however as it isn't targeted some residents may not be aware of the support and access it.		
Religion or belief		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with faith groups.	Natasha Jebbison	16/12/22
Pregnancy or maternity	There is targeted work for children over 5 but there is no targeted work for expected mothers and mothers with new borns.	Work will be done to raise awareness of the fund with 3 rd party organisations including children centers and Early help. Residents will be able to apply for support through the Discretionary Support team	Natasha Jebbison	16/12/22
Marriage/civil partnership		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3 rd sector groups.	Natasha Jebbison	16/12/22

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below

Equality Analysis

No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p> <p>Due to the lack of data around these groups and the focus of the fund being on financial stability the focus has not been on protected groups. So work will need to be done to promote the fund to ensure residents in financial need within the protected groups access it.</p>	x
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

7. Sign-Off

Equality Analysis

Officers that must approve this decision	
Equalities Lead	Name: Gavin Handford Position: Director of Policy, Programmes & Partnerships Date: 29/11/2022
Director	Name: Susmita Sen Position: Corporate Director for Housing Date: 29/11/2022