

# Cabinet Agenda

**Date:** Thursday 23 June 2022

**Time:** 6.30 pm

**Venue:** Council Chamber, Harrow Civic Centre,  
Station Road, Harrow, HA1 2XY

## Membership:

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**Chair:** Councillor Paul Osborn (Leader of the Council and Portfolio Holder for Strategy)

### Portfolio Holders:

Councillor Marilyn Ashton

Councillor David Ashton

Councillor Stephen Greek

Councillor Hitesh Karia

Councillor Jean Lammiman

Councillor Mina Parmar

Councillor Anjana Patel

Councillor Pritesh Patel

Councillor Norman Stevenson

### Portfolio:

Deputy Leader of the Council and Portfolio Holder for  
Planning & Regeneration

Finance & Human Resources

Performance, Communications & Customer Experience

Children's Services

Community & Culture

Housing

Environment & Community Safety

Adult Services & Public Health

Business, Employment & Property

### Non-Executive Members:

### Role:

Councillor Thaya Idaikkadar

Councillor Ameet Jogia

Councillor Kanti Rabadia

John Higgins

Non-Executive Cabinet Member

Non-Executive Cabinet Member

Non-Executive Cabinet Member

Non-Executive Voluntary Sector Representative

## Quorum 3, including the Leader and/or Deputy Leader)

**Contact:** Nikoleta Kemp, Senior Democratic & Electoral Services Officer

Tel: 07761 405898 E-mail: [nikoleta.kemp@harrow.gov.uk](mailto:nikoleta.kemp@harrow.gov.uk)

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# Useful Information

## Joining the Meeting virtually

The meeting is open to the public and can be viewed online at [www.harrow.gov.uk/virtualmeeting](http://www.harrow.gov.uk/virtualmeeting)

## Attending the Meeting in person

Directions to the Civic Centre can be found at: [www.harrow.gov.uk/contact](http://www.harrow.gov.uk/contact). It is accessible to people with special needs, with accessible toilets and lifts to the meeting rooms. If you have specific requirements, please contact the officer listed on the front page of this agenda.

You will be admitted on a first-come-first basis and directed to seats.

Please:

- (1) Take a Covid 19 test before travelling and do not attend in person if you test positive.
- (2) Wear a face covering and use the provided hand sanitiser.
- (3) Stay seated.
- (4) Access the meeting agenda online at [Browse meetings - Cabinet – Harrow Council](#)
- (5) Put mobile devices on silent.
- (6) Follow instructions of the Security Officers.
- (7) Advise Security on your arrival if you are a registered speaker.

## Filming / recording

This meeting may be recorded or filmed, and if you choose to attend, you will be deemed to have consented to this. Any recording may be published on the Council website.

**Agenda publication date: Tuesday 14 June 2022**

## **Agenda - Part I**

### **1. Apologies for Absence**

To receive apologies for absence (if any).

### **2. Declarations of Interest**

To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Committee, Sub-Committee or Panel;
- (b) all other Members present in any part of the room or chamber.

### **3. Petitions**

To receive any petitions submitted by members of the public or Councillors.

### **4. Public Questions**

To receive any public questions received in accordance with paragraph 16 of the Executive Procedure Rules.

Questions will be asked in the order in which they were received. There will be a time limit of 15 minutes for the asking and answering of public questions.

**[The deadline for receipt of public questions is 3.00 pm, 20 June 2022. Questions should be sent to [publicquestions@harrow.gov.uk](mailto:publicquestions@harrow.gov.uk) No person may submit more than one question].**

### **5. Councillor Questions \***

To receive any Councillor questions received in accordance with paragraph 17 of the Executive Procedure Rules.

Questions will be asked in the order agreed with the relevant Group Leader by the deadline for submission and there be a time limit of 15 minutes.

**[The deadline for receipt of Councillor questions is 3.00 pm, 20 June 2022.]**

### **6. Key Decision Schedule June - August 2022 (Pages 7 - 14)**

### **7. Progress on Scrutiny Projects (Pages 15 - 16)**

For consideration

## **Place**

### **KEY 8. 1 hour free on-street parking (Pages 17 - 40)**

Report of the Corporate Director of Place and the Director of Environment.

**KEY 9. Investment into Harrow's Tennis Infrastructure** (Pages 41 - 68)

Report of the Corporate Director of Place and the Director of Inclusive Economy, Leisure and Culture.

**KEY 10. Inter Authority Agreement (IAA) for the provision of Harrow and Brent Councils Special Needs Transport (HSNT)** (Pages 69 - 78)

Report of the Corporate Director of Place.

## **People**

**KEY 11. School Organisation Update - Provision for Special Educational Needs** (Pages 79 - 106)

Report of the Interim Corporate Director of People Services.

## **Resources and Commercial**

**KEY 12. Authority to Implement and administer the Covid 19 Additional Relief Scheme (CARF scheme)** (Pages 107 - 164)

Report of the Director of Finance.

**KEY 13. Household Support Fund extension** (Pages 165 - 208)

Report of the Corporate Director, Resources.

**14. Appointment of Portfolio Holder Assistants** (To Follow)

Report of the Director of Legal and Governance.

**15. Appointment of Cabinet Advisory Panels, Consultative Forums and Appointment of Chairs** (To Follow)

Report of the Director of Legal and Governance.

**16. Any Other Urgent Business**

Which cannot otherwise be dealt with.

## **Agenda - Part II - Nil**

### **Data Protection Act Notice**

The Council will record the meeting and will place the recording on the Council's website.

[**Note:** The questions and answers will not be reproduced in the minutes.]

Deadline for questions	3.00 pm on 20 June 2022
Publication of decisions	24 June 2022
Deadline for Call in	5.00 pm on 01 July 2022
Decisions implemented if not Called in	02 July 2022

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## London Borough of Harrow

### Key Decision Schedule ( June 2022 - August 2022 )

#### June 2022

This is a list of Key Decisions which the Authority proposes to take at the above Cabinet meeting. The Cabinet agenda containing all the reports being considered will be published 5 clear days before the meeting.

#### A Key Decision is one which is likely to:

- (i) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to its budget for the service or function to which the decision relates. A decision is significant if it involves expenditure or the making of savings of an amount in excess of £1m of capital or £500,000 of revenue or where savings or expenditure are less than these amounts but they constitute more than 50% of the budget attributable to the service in question; or
- (ii) be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough.

#### Decisions which the Cabinet intends to make in private

The Cabinet may meet in private to consider reports which contain confidential information. A private meeting of the Cabinet is open only to Members of the Cabinet, other Councillors and Council officers. This Schedule also contains non-Key Decisions which involve Cabinet meeting in private. Any person can make representations to the Cabinet if they believe the decision should instead be made in the public Cabinet meeting by emailing [democratic.services@harrow.gov.uk](mailto:democratic.services@harrow.gov.uk).

The membership of the Cabinet is:

Councillor Paul Osborn (Leader; Strategy)

Councillor Marilyn Ashton (Deputy Leader, Planning & Regeneration)

Councillor David Ashton (Finance & Human Resources)

Councillor Stephen Greek (Performance, Communications & Customer Experience)

Councillor Hitesh Karia (Children's Services)

Councillor Jean Lammiman (Community & Culture)

Councillor Mina Parmar (Housing)

Councillor Anjana Patel (Environment & Community Safety)

Councillor Pritesh Patel (Adult Services & Public Health)

Councillor Norman Stevenson (Business, Employment & Property)



6

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
<b>JUNE 2022</b>				
Inter Authority Agreement (IAA) for the provision of Harrow and Brent Councils Special Needs Transport (HBSNT)	<p>To finalise a new 12-month Inter Authority Agreement for the provision of Harrow and Brent Councils' Special Needs Transport and thereafter to finalise a longer-term IAA, dependent on the outcome of a joint review between the Councils.</p> <p>To note the operational responsibility of the delivery of this process is to the Interim Divisional Director of Environmental Services.</p>	<p>Councillor Anjana Patel</p> <p>Corporate Director Place Tony.Galloway@harrow.gov.uk</p>	Open	Agenda report and any related appendices.
Investment Into Harrow's Tennis Infrastructure	<p>To approve entering into an agreement with the Lawn Tennis Association (LTA) for capital funding to renovate courts in Harrow's parks from the LTA's Renovation Fund, and to delegate to the Corporate Director of Place the authority to finalise the details of the funding agreement and to take any further actions necessary to complete the funding agreement.</p> <p>To delegate authority to the Corporate Director of Place and the Director of</p>	<p>Councillor Jean Lammiman</p> <p>Corporate Director Place tim.bryan@harrow.gov.uk, tel. 07917 076800</p>	Open	<p>Agenda report and any related appendices</p> <p>Public consultation to be undertaken with Park User Groups, residents, local tennis and sports clubs, schools and organisations for young people.</p>

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
	<p>Finance to enter a works contract with the successful contractor for the renovation of the courts</p> <p>To approve the commencement of a procurement to identify and contract with a supplier for the provision of a tennis court operator and delegate authority to the Corporate Director of Place and the Director of Finance to enter a contract with the successful contractor.</p> <p>To delegate authority to the Corporate Director of Place to agree a consultation strategy in relation to the renovation of the courts.</p>			
School Organisation Update - Provision for Special Educational Needs	To delegate authority to the Corporate Director of People Services to determine notices for additional Special Educational Needs (SEN) provision.	<p>Councillor Hitesh Karia</p> <p>Corporate Director, People Johanna.morgan@harrow.gov.uk tel. 020 8736 6841</p>	Open	<p>Agenda report and any related appendices.</p> <p>Consultation is being undertaken as part of the publication of Statutory Notices to increase SEND provision. The Local Authority has a statutory responsibility to provide sufficient school places for its</p>

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
				area and these additional places are required to meet the current demand.
<p>⇒ Authority to Implement and administer the Covid 19 Additional Relief Scheme (CARF scheme)</p>	<p>To seek authority to implement and administer the Covid-19 Additional Relief Scheme which will provide additional business rates support to potentially up to 400 traders in Harrow who fit into the eligible valuation office categories and have not previously received business rates grant support.</p>	<p>Councillor David Ashton  Director of Finance Fern.Silverio@harrow.gov.uk, Tel: 020 8736 6818</p>	<p>Open</p>	<p>Agenda report and any related appendices.</p>
<p>1 hour free on-street parking</p>	<p>To delegate authority to the Director of Environment Services to implement 1 hour free parking in all on-street parking bays by 1 August 2022, to consider the consultation responses, in consultation with the Portfolio Holder and if appropriate implement the order.</p>	<p>Councillor Anjana Patel  Corporate Director, People nicolina.cooper@harrow.gov.uk</p>	<p>Open</p>	<p>Agenda report and any related appendices.  A statutory consultation of the traffic management order is required.</p>

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
Household Support Fund extension	To approve the policy on the Household Support Fund extension and the Delivery Plan options for allocating the funding made available through the Household Support Fund extension.	Councillor Stephen Greek  Director of Strategy and Partnerships angelica.stoichkov@harrow.gov.uk, tel. 07731591751	Open	Agenda report and any related appendices.
<b>JULY 2022</b>				
Adult Social Care Bedded Care Strategy	To seek authority for the Corporate Director of People Services and the Director of Finance and Assurance to enter new block contracts.	Councillor Pritesh Patel  Corporate Director, People peter.singh@harrow.gov.uk	Open	Agenda report and any related appendices.  Consultation with bedded care providers.
Revenue and Capital Monitoring 2021/22 - Final Outturn	To note the Revenue and Capital final outturn for 2021/22 and note any Capital Programme adjustments /movements in reserves as detailed in the report.	Councillor David Ashton  Director of Finance jo.frost@harrow.gov.uk	Open	Agenda report and any related appendices.

Subject	Nature of Decision	Cabinet Member / Lead officer	Open or Private Meeting	Additional Documents to be submitted and any Consultation to be undertaken
<b>AUGUST 2022</b>				

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**PROGRESS ON SCRUTINY PROJECTS**

Review	Methodology	Type of report	Expected date for report to Cabinet	Comments
<b>Joint Overview &amp; Scrutiny Committee (JHOSC) for Shaping a Healthier Future Programme</b>	Joint Committee	Update reports provided for O&S/ Health & Social Care sub committee and Cabinet (for information)	As required	<p>The first JHOSC meeting of the new municipal cycle will be on 20 July 2022 (hosted by Brent Council) when it is expected the work programme and approach for the year ahead will be considered.</p> <p>There are regular update reports on the JHOSC to Harrow’s Health and Social Care Scrutiny Sub-Committee so that there is a formal feedback loop between regional and local health scrutiny. Councillor Chetna Halai, chair of Health Sub is Harrow’s member on the JHOSC.</p>
<b>Shared Services</b> – Lessons learnt, other councils’ experiences, impact on savings and improving quality	Review	Report to Cabinet	By September 2021	<p>The final report of the review was considered by O&amp;S on 20 April 2021, with a relaxation on the timescales for an Executive response (by September 2021). <b>Update:</b> due to resource and capacity issues, this has yet to be completed.</p>

**Contact:** Nahreen Matlib, Senior Policy Officer

**Email:** nahreen.matlib@harrow.gov.uk

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	23 June 2022
<b>Subject:</b>	1 hour free on-street parking
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director Place; Tony Galloway - Director of Environment
<b>Portfolio Holder:</b>	Councillor Anjana Patel - Portfolio Holder Environment & Community Safety
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All Wards
<b>Enclosures:</b>	Equalities Impact Assessment

## **Section 1 – Summary and Recommendations**

This report sets out the proposals for introducing free one hour parking to paid for on street parking bays across the borough. This report sets the options considered and recommendations for how this policy may be introduced across the borough from 1<sup>st</sup> August 2022.

### **Recommendations:**

Cabinet is requested to:

1. Delegate authority to the Director of Environment Services to take all necessary steps to make a traffic management order to implement 1-hour free parking in all on street parking bays by the 1<sup>st</sup> August 2022, to consider the consultation responses, in consultation with the Portfolio Holder for Environment and Community Safety and if appropriate implement the order.

### **Reason: (for recommendations)**

One-hour free parking is being recommended to assist the recovery of local businesses in the borough following the pandemic.

## **Section 2 – Report**

### **Introductory paragraph**

Following the pandemic local businesses have been impacted and require economic recovery support. Harrow Council's Economic Recovery Strategy set out a number of objectives to support local businesses. To offer further support, based on strong feedback gained through business surveys, trader group meetings and one-to-one business engagement, we are also proposing to implement a one-hour free parking scheme in paid for parking bays as business have highlighted parking as a high priority for them.

### **Options considered**

Options considered were to continue to provide 20 minutes free parking, remove the free parking option or increase the free parking option. The latter option is proposed as this maximises the support for local businesses and an extension to one hour will assist other retail and restaurant businesses which would require more than 30 minutes to visit.

### **Current situation**

Currently the Council offer of free parking is made up of 20 minutes free parking and a 10-minute grace period.

The free parking is for on street paid for parking bays only and does not include car parks, with the exception of the Leisure Centre car park where there is a 3-hour free period implemented when Harrow took over operational control.

The free current on street session is only valid for one registration each calendar day and is obtained via the pay and display machines and not

available via cashless parking. The reason for this is that without a significant investment in new machines with capabilities of communicating with the cashless providers system the offer of a free parking would be available twice in a calendar day if cashless and pay and display were both used.

### **Why a change is needed**

Local businesses require economic recovery support from the pandemic. This new proposal of 1-hour free parking on street will assist them, in conjunction with the Economic Strategy, to deliver inclusive and sustainable economic growth. This will build a stronger economy, supports local businesses, assist to safeguard jobs, and create new employment opportunities for Harrow's diverse population. The 1-hour free parking on street proposal is also complimentary of physical improvements that are taking place on Harrow High Streets to increase footfall, dwell time and spend, by way of also providing support to local businesses and the economy.

### **Implications of the Recommendation**

#### **Considerations**

All on street pay and display machines will need to be updated with the new tariff for one-hour free parking on street.

The traffic management order will need to be drafted to implement the one hour free on street.

The traffic management order will be put out to a 21-day statutory consultation and subject to objections will be implemented by 1<sup>st</sup> August 2022.

Should objections be received against the traffic management order, an objections report will be drafted for consideration by the Director of Environment in consultation with the Portfolio Holder for Environment and Community Safety.

#### **Resources, costs**

The one-off costs for this project are detailed below

Description	One off cost
Changes to tariffs on P&D machines	£23,000
TMO (Notice of Variation)	£1,000
Estimated total costs	£24,000

This proposal will have an impact of Pay & Display parking income. Please see further detail in the Financial Implications section of this report.

#### **Staffing/workforce**

The traffic management order will be implemented via existing resources.

The tariff upgrades to the machines will be implemented by 1<sup>st</sup> August 2022

### Performance Issues

New performance measures will be put in place to monitor and record the take up of the one-hour free parking. This will all be monitored to ensure they are cost effective to the Council, meeting the customer needs, and delivering the objectives of the new policy to support local businesses, via footfall data as well as those mentioned above.

### Environmental Implications

There is no environmental impact as the existing practices will remain in place and only the period of the free parking is being increased from 20 minutes to one hour.

### Data Protection Implications

All data held by the pay and display machines is in line with GDPR and is fully owned by the Council.

### Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below.  
**Yes**

The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
The introduction of one-hour free parking (on street) will result in a loss of income (estimated to be between £60k to £600k depending on take-up), creating an in-year budget deficit and increase the reported budget gap for 2023/24 onwards	<ul style="list-style-type: none"><li>▪ The council has corporate reserves which can be applied as a one-off measure in year.</li><li>▪ Looking beyond 2022/23, the loss of income will have to be matched by ongoing efficiencies to prevent an increase in the reported budget gap</li></ul>	Red
There is insufficient funding to support the implementation cost of £24,000	<ul style="list-style-type: none"><li>▪ The council has corporate reserves which can be applied as a one-off measure in year.</li></ul>	Green
Objections may be received to the traffic management order consultation	<ul style="list-style-type: none"><li>▪ Should objections be received, they will be considered and if appropriate an objections report written for consideration by the Director of Environment in consultation with the Portfolio Holder for Environment and Community Safety to consider if the scheme should continue to be implemented or not.</li></ul>	Amber

## Legal Implications

Subject to statutory consultation requirements, the council has powers to introduce, implement and change Traffic Management Orders' under the Road Traffic Regulation Act 1984, The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and The Traffic Signs Regulations and General Directions 2016.

Section 122 of the Road Traffic Regulation Act 1984, under which the council has a duty to secure free movement of vehicular and other traffic (including pedestrians) and maintain the provision of suitable and adequate parking facilities on and off the highway.

## Procurement Implications

There are no procurement implications.

## Financial Implications

The income budget for on street Pay & Display parking is £1.182m.

Parking income has been adversely affected by the COVID-19 pandemic. For illustration purpose, the financial data prior to 2020/21 is used in the analysis below.

### On Street parking

The average number of paid and free tickets are summarised in the table below. An average annual income of around £1.2m was achieved for the 3-year period between 2017/18 and 2019/20.

Average no. of Paid tickets issued	904,566
Average income per Paid ticket	£1.32
<b>Average Total Income</b>	<b>£1,195,830</b>
Average no. of Free 20 mins tickets issued	1,254,901

Should the current free parking period be extended to an hour, it is anticipated that the number of free tickets would increase, and the number of paid tickets would decrease accordingly. The table below provides a sensitivity analysis of the potential loss of income. This sets out scenarios of 5% to 50% reduction in the number of paid tickets, with the estimated potential loss of income of £60k at 5% increasing to £600k at 50%.

	5%	10%	15%	20%	25%	30%	35%	40%	45%	50%
Scenario	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued	Less Paid tickets issued
Reduction in the number of paid tickets	45,228	90,457	135,685	180,913	226,142	271,370	316,598	361,826	407,055	452,283
Potential loss of P&D income	£59,738	£119,477	£179,215	£238,953	£298,692	£358,430	£418,168	£477,907	£537,645	£597,383

This report proposes the introduction of one-hour free parking in all on street Pay & Display bays from August 2022. This will result in a part year loss of parking income in 2022/23 as the proportion of paid tickets is expected to reduce at on street parking facilities. The reduction in income will depend on the time duration of parking that motorists require, which will determine the level of paid for parking. Currently there is no activity data to accurately quantify the impact on paid tickets from a one-hour free parking proposal, therefore the tickets data and income from September 2022 onwards will be closely monitored to assess the actual income loss in 2022/23.

The part year loss of income in 2022/23 will be met from a specific 1 hour free parking reserve. The data collated in 2022/23 will help to estimate the annual loss of income, which will have to be funded from efficiencies within the 2023/24 annual budget setting process.

To implement the changes for on street parking, there would be a one-off implementation cost estimated at £24k for changes to tariffs on each Pay & Display machine to reflect the new free parking period and the notice of TMO. This cost will be met from a specific 1 hour free parking reserve.

Financial performance for 2021/22 will be reported to Cabinet in July 2022 as part of the Outturn Report. As forecast, an underspend has been delivered in 2021/22. As the loss of income from the 1 hour free parking (on street) initiative is unknown at the time of implementation and will need to be monitored closely throughout the year, a sum of £624k will be used from the 2021/22 underspend and set aside in a specific 1 hour free parking reserve to support the initiative in year. At the time of setting the 2023/24 budget, there will be more data upon which to estimate the actual loss of income which will be managed on an ongoing basis through efficiencies in the annual budget setting process.

## **Equalities implications / Public Sector Equality Duty**

Decision makers should have due regard to the public sector equality duty in making their decisions. The equalities duties are continuing duties they are not duties to secure a particular outcome. It is important that Cabinet has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

*A public authority must, in the exercise of its functions, have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (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.*

*Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and*

*persons who do not share it involves having due regard, in particular, to the need to:*

- (a) *remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;*
- (b) *take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;*
- (c) *Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.*

*The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.*

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) *Tackle prejudice, and*
- (b) *Promote understanding.*

*Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.*

*The relevant protected characteristics are:*

- *Age*
- *Disability*
- *Gender reassignment*
- *Pregnancy and maternity*
- *Race*
- *Religion or belief*
- *Sex*
- *Sexual orientation*
- *Marriage and Civil partnership*

An equalities impact assessment has also been completed as part of this policy implementation, which in summary has a positive impact on those with protected characteristics particularly those who may be more reliant on traveling by car. Once the consultation responses to the order are received the Equality Impact assessment will be updated prior to a decision being made on the order. The order will not impact on disabled parking bays.

## **Council Priorities**

Please identify how the decision sought delivers these priorities.

1. Thriving economy – this objective will be assisted by assisting local businesses in the recovery from the pandemic by providing a one-hour free parking session for their short-term customers on street.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 9<sup>th</sup> June 2022**

**Statutory Officer: Jessica Farmer**

Signed on behalf of the Monitoring Officer

**Date: 1<sup>st</sup> June 2022**

**Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 10<sup>th</sup> June 2022**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 31<sup>st</sup> May 2022**

**Head of Internal Audit: Susan Dixson**

Signed by the Head of Internal Audit

**Date: 1st June 2022**

## **Mandatory Checks**

**Ward Councillors notified:** NO, as it impacts on all Wards

**EqIA carried out:** YES

**EqIA cleared by:** Micah McLean

## **Section 4 - Contact Details and Background Papers**

**Contact:** Nicolina Cooper, Interim Head of Traffic, Highways and Asset Management, 07926072600, [Nicolina.cooper@harrow.gov.uk](mailto:Nicolina.cooper@harrow.gov.uk)

**Background Papers:** [Cabinet report May 2022 The Harrow Card](#)

**Call-in waived by the Chair of Overview and Scrutiny Committee - NO**



**You will need to produce an Equality Impact Assessment (EqIA) if:**

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

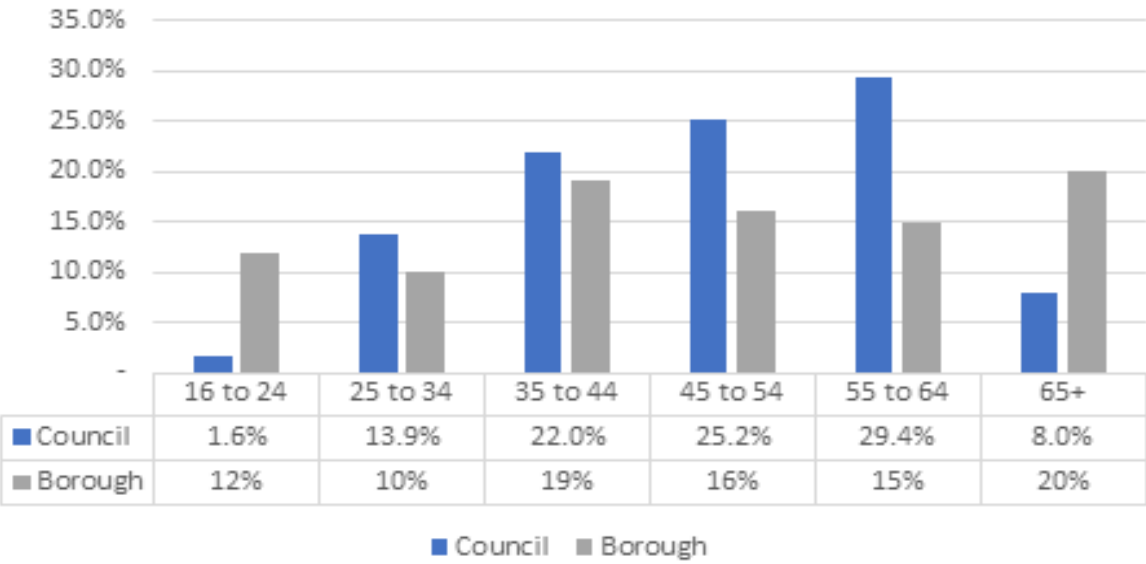
Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity.

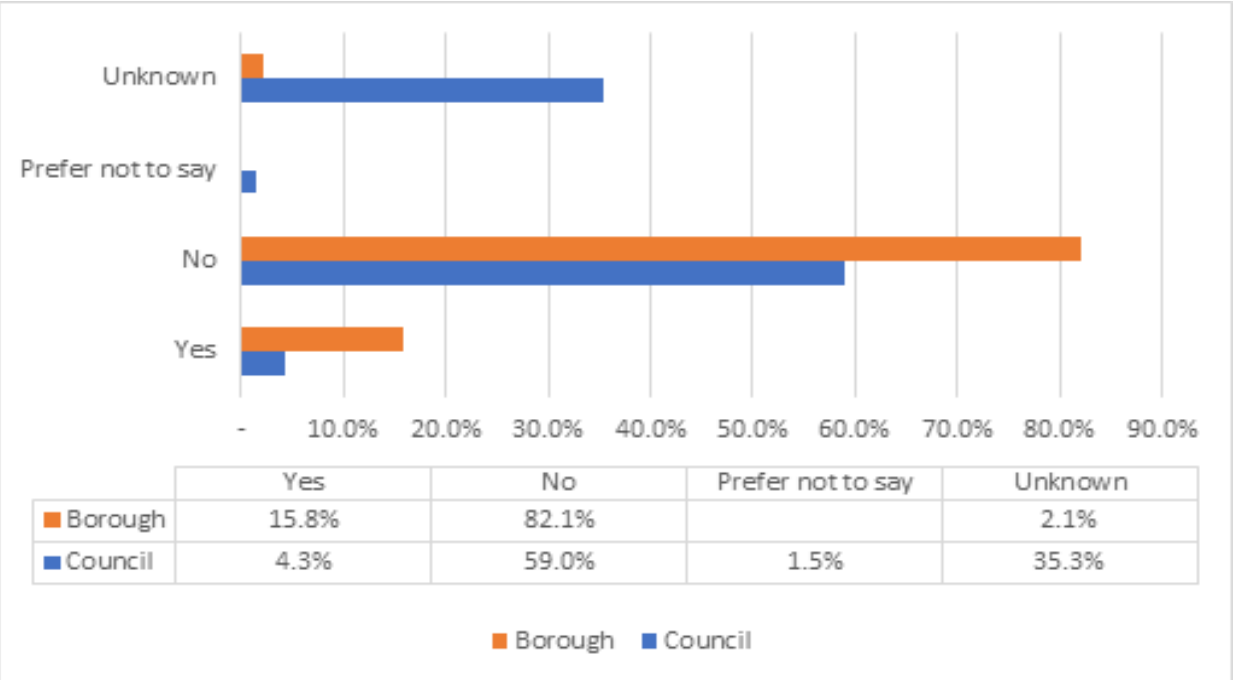
You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1).

Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	1 hour free parking	Date EqIA created 24 <sup>th</sup> May 2022
Name and job title of completing/lead Officer	Nicolina Cooper, Interim Head of Traffic, Highways, and Asset Management	
Directorate/ Service responsible	Place	
Organisational approval		
EqIA approved by Directorate Equality, Diversity and Inclusion Team (EDI) Equality, Diversity and Inclusion Team	Name <b>Micah McLean, Policy Officer – Equality, Diversity and Inclusion</b>	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA  Date of approval 24.05.2022

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)
<p><b>a) What is your proposal?</b></p> <p>It is propose to implement free parking for one hour via cashless parking and pay point (via our contractor Pay by Phone) for all on street paid for parking bays where possible.</p> <p>Where it is not possible to implement pay point due to a local business without a pay point option in place, a maximum stay bay will be implemented where the customer can park for free up to the maximum stay i.e. 1 hour no return within 1 hour. This is an example only and the maximum stay will be specific to the location requirements.</p>
<p><b>b) Summarise the impact of your proposal on groups with protected characteristics</b></p> <p>There should be no diiferential impact. This is on the basis that all groups who have a mobile phone and bank card will be able to use the new service.</p> <p>Should anyone not have a mobile phone or bank card, they will be able to use the pay point function in local businesses to pay for their parking using cash in person.</p> <p>For locations where pay point is not available a maximum free stay bay will be implemented.</p>
<p><b>c) Summarise any potential negative impact(s) identified and mitigating actions</b></p> <p>None</p>

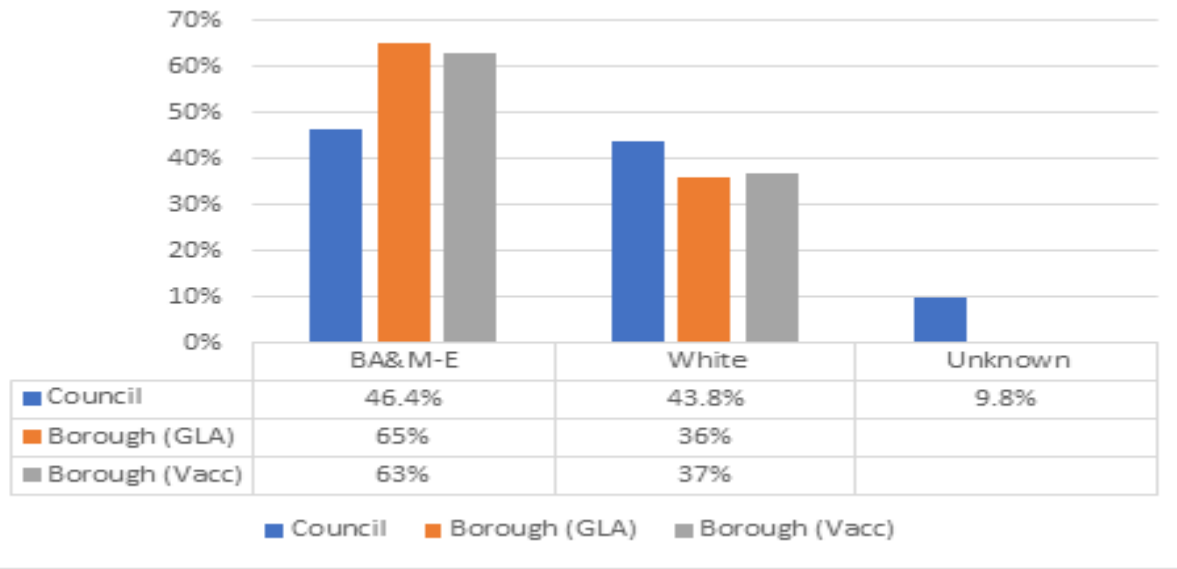
2. Assessing impact																										
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact																								
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact																					
			Minor	Major																						
Age	 <table border="1" data-bbox="504 1157 1646 1284"> <thead> <tr> <th></th> <th>16 to 24</th> <th>25 to 34</th> <th>35 to 44</th> <th>45 to 54</th> <th>55 to 64</th> <th>65+</th> </tr> </thead> <tbody> <tr> <td>■ Council</td> <td>1.6%</td> <td>13.9%</td> <td>22.0%</td> <td>25.2%</td> <td>29.4%</td> <td>8.0%</td> </tr> <tr> <td>■ Borough</td> <td>12%</td> <td>10%</td> <td>19%</td> <td>16%</td> <td>15%</td> <td>20%</td> </tr> </tbody> </table>		16 to 24	25 to 34	35 to 44	45 to 54	55 to 64	65+	■ Council	1.6%	13.9%	22.0%	25.2%	29.4%	8.0%	■ Borough	12%	10%	19%	16%	15%	20%	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<p>The resident population of Harrow according to the 2020 mid-year population estimates was 252,338 Groups. Harrow’s age demographic is captured by the graph above, which is taken from the Annual Workforce Equality Report 2020-2021.</p> <p><b>Impact:</b> The proposal will have a positive impact on customers from all age groups because it provides an hour of free parking and a range of payment options.</p>																			
<p><b>Disability</b></p>	 <table border="1" data-bbox="488 893 1653 1013"> <thead> <tr> <th></th> <th>Yes</th> <th>No</th> <th>Prefer not to say</th> <th>Unknown</th> </tr> </thead> <tbody> <tr> <td>Borough</td> <td>15.8%</td> <td>82.1%</td> <td></td> <td>2.1%</td> </tr> <tr> <td>Council</td> <td>4.3%</td> <td>59.0%</td> <td>1.5%</td> <td>35.3%</td> </tr> </tbody> </table> <p>According to the Annual Workforce Equalities Report 2020-2021 15.8% of Harrow’s population are disabled. There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity.</p> <p>There are also particular groups that have specific obstacles in progressing to the labour market. These include adults with learning disabilities and those with severe mental health issues.</p>		Yes	No	Prefer not to say	Unknown	Borough	15.8%	82.1%		2.1%	Council	4.3%	59.0%	1.5%	35.3%	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
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Borough	15.8%	82.1%		2.1%																
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	<p>Accessibility and suitable transport are also barriers for disabled people.</p> <p>Disabled people are also likely to be under-represented among business owners within Harrow.</p> <p><b>Impact:</b> This proposal will benefit disabled customers because it provides an hour of free parking. In addition, the proposal will benefit customers that have disabilities that impacts their ability to work and socio-economic status.</p>				
<b>Gender reassignment</b>	<p>There is limited national data collected for people within this protected characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.</p> <p>The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</p> <p><b>Impact:</b> There is no anticipated impact on this group.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<p>At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London. As of October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have also been 8 Opposite Gender Civil Partnerships and 57 Same Sex marriages within this period.</p> <p><b>Impact:</b> There is no anticipated impact on this group.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy and Maternity</b>	<p>ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8%.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>The borough has the worst infant mortality rate in London, at a rate of 5.1 deaths per 1000 live births, which is a strong indicator of poverty and inequality in the borough.</p> <p>Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</p> <p><b>Impact:</b> This proposal will have a positive impact on customers in the pregnancy and maternity protected group because the policy provides an hour of free parking and a range of payment options.</p>				
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Race/  
Ethnicity



Harrow is one of the most culturally diverse local authorities in the UK. According to the Annual Workforce Equality Report 2020-2021 over 60% of residents are from Black, Asian, and Multi-Ethnic backgrounds and 36% are from White groups. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.

Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow), Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

The majority of 16–18-year-olds that are classed as NEET are from BAME backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.

At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a BAME population of 77% and 75%.

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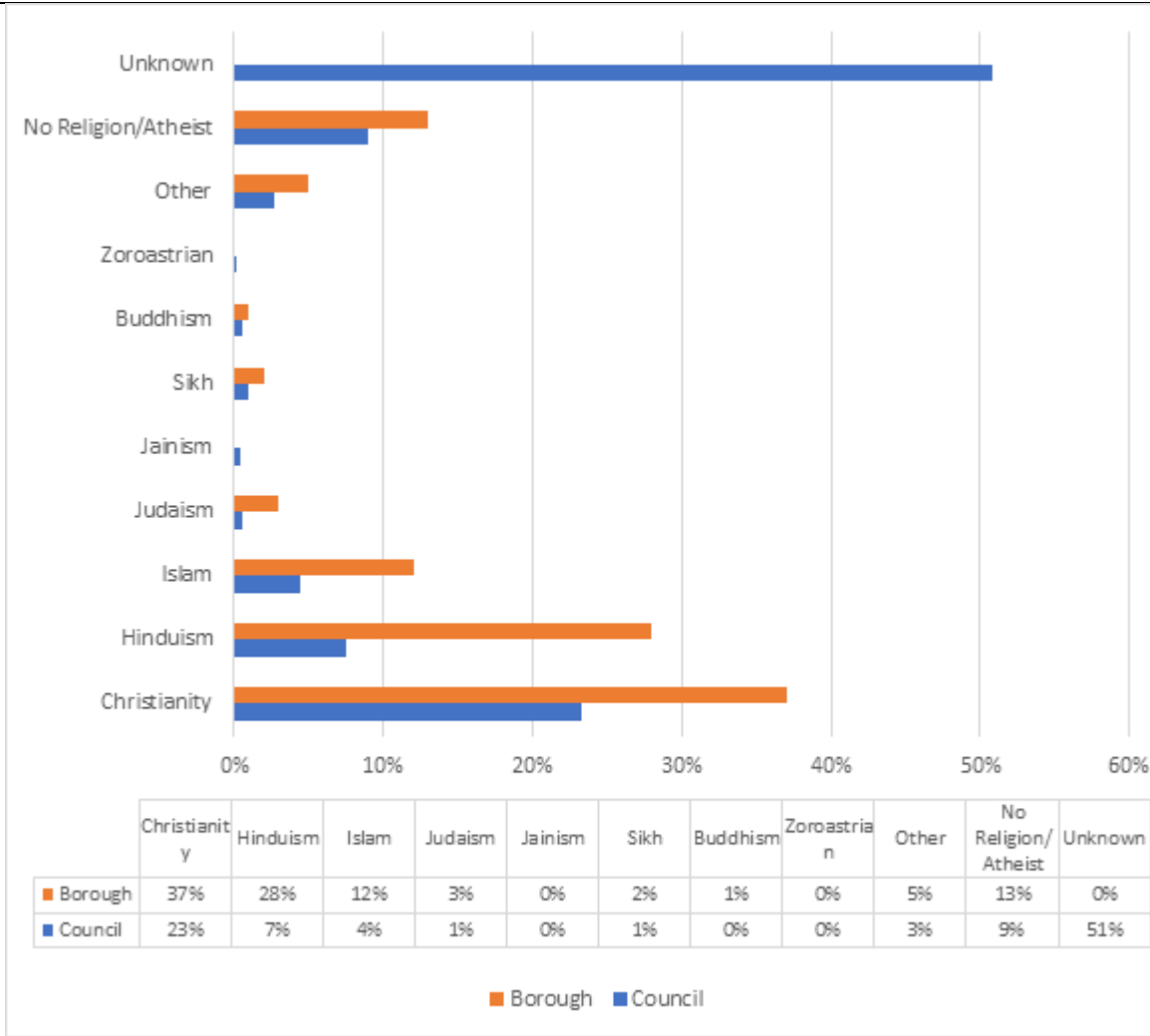
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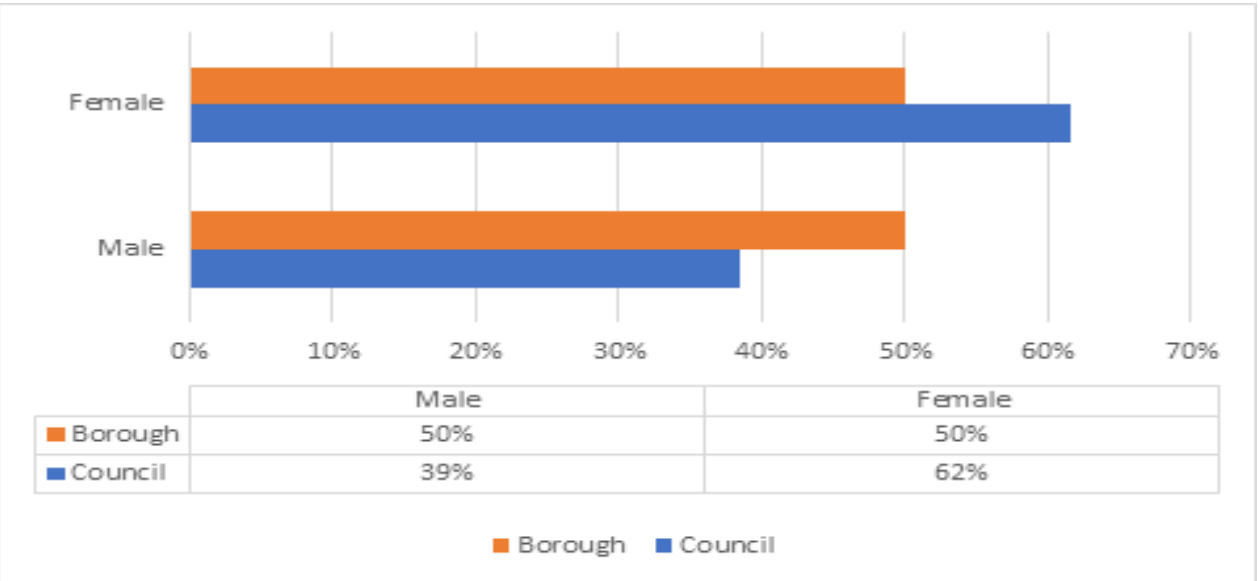


	<p>The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a BAME population of 74% (2011 census).</p> <p>BAME residents are more likely to experience barriers to employment due to lack of English language , functional and digital skills.</p> <p>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow's town centres are BAME- owned.</p> <p><b>Impact:</b> There is no anticipated impact on this group.</p>				
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Religion or belief



	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>The Annual Workforce Equality Report 2020-2021 mentions that Christianity (37%), Hinduism (28%), No religion/ Atheist (13%) and Islam (12%) are the four biggest religious demographics in Harrow. Residents that are of the Jewish faith is 3% of the borough population.</p> <p><b>Impact:</b> There is no anticipated impact on this group.</p>				
<p>Sex</p>	 <p>The Annual Workforce Equality Report 2020-2021 indicates that the percentage of residents within Harrow that are male and female is split evenly at 50%. Harrow is a low wage borough, with both men and women that are employed in the borough earning less than the London average of £760<sup>7</sup>earning less compared to men. Women earn less than men in the borough. Average gross weekly earnings among women working in Harrow is £500, nearly 38% lower than the London average of £688<sup>8</sup>.</p> <p>20% of Harrow businesses are female led.</p> <p>While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women ton return to work, as they are able to share childcare responsibilities.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p><b>Impact:</b> There is no anticipated impact on this group.</p>																			
<p><b>Sexual Orientation</b></p>	<div data-bbox="448 351 1523 1085"> <p style="text-align: center;"><b>Sexual orientation - Council</b></p> <table border="1" data-bbox="459 885 1500 997"> <thead> <tr> <th></th> <th>Heterosexual/Straight</th> <th>LGB/other</th> <th>Prefer not to say</th> <th>Unknown</th> </tr> </thead> <tbody> <tr> <td>London</td> <td>88.9%</td> <td>4.5%</td> <td></td> <td>6.5%</td> </tr> <tr> <td>Council</td> <td>47.5%</td> <td>1.1%</td> <td>2.2%</td> <td>49.3%</td> </tr> </tbody> </table> </div> <p>The Annual Workforce Equality Report 2020-2021 indicates that the percentage of LGBTQIA+ residents within London is 4.5%.</p> <p><b>Impact:</b> There is no anticipated impact on this group.</p>		Heterosexual/Straight	LGB/other	Prefer not to say	Unknown	London	88.9%	4.5%		6.5%	Council	47.5%	1.1%	2.2%	49.3%	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
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**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No

If you clicked the Yes box, Include details in the space below

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer


#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

All groups and customers will be treated the same under the new policy with the transaction options as set out above

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

Outcome 2

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

Outcome 3

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	23 <sup>rd</sup> June 2022
<b>Subject:</b>	Investment into Harrow's Tennis Infrastructure
<b>Key Decision:</b>	Yes – affects more than two wards
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director – Place; Mark Billington - Director Inclusive Economy, Leisure & Culture
<b>Portfolio Holder:</b>	Councillor Jean Lammiman - Portfolio Holder for Community and Culture  Councillor David Ashton - Portfolio Holder for Finance and Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1: Equalities Impact Assessment

## **Section 1 – Summary and Recommendations**

This report seeks approval to enter into an agreement with the Lawn Tennis Association (LTA) for the renovation of tennis courts in Harrow's Parks and to then proceed with the procurement for restoration and renovation of the courts and for an operator to manage the courts.

### **Recommendations:**

Cabinet is requested to:

1. Approve entering into an agreement with the Lawn Tennis Association (LTA) for capital funding to renovate courts in Harrow's parks from the LTA's Renovation Fund, and to delegate to the Corporate Director of Place the authority to finalise the details of the funding agreement and to take any further actions necessary to complete the funding agreement. The supplier that will renovate the tennis courts will be procured by the LTA through the LTA National Framework.
2. Delegate authority to the Corporate Director of Place and the Director of Finance, following consultation with the Portfolio Holder for Community and Culture and the Portfolio Holder for Finance and Human Resources to enter into a works contract between Harrow Council and the successful contractor for the renovation of the courts.
3. Approve the commencement of a procurement to identify and contract with a supplier for the provision of a tennis court operator and delegate authority to the Corporate Director of Place and the Director of Finance, following consultation with the Portfolio Holder for Community and Culture and the Portfolio Holder for Finance and Human Resources to enter into a contract between Harrow Council and the successful contractor. The responsible Officer leading on the procurement will be the Head of Service – Culture and Leisure. Approval in this regard to include delegating to explore and decide the best contract model between the council and the operator, which model may include a straight/conventional contract, a works concession contract or any other model that will be most effective and also yield value for money to the council
4. Delegate authority to the Corporate Director of Place following consultation with the Portfolio Holder for Community and Culture to agree a consultation strategy in relation to the renovation of the courts

### **Reason: (for recommendations)**

To enable the tennis courts in Harrow's parks to be renovated to a playable standard, increasing participation in tennis in Harrow, and ensuring that the courts are maintained in the long term by being financially sustainable.

## **Section 2 – Report**

### **1. Introduction**

1.1 Entering into a funding agreement with the Lawn Tennis Association (LTA) for grant funding to fund the renovation of tennis courts in Harrow's parks and the procurement of an operator to manage the courts will help to deliver the Council's objective to address health inequality by increasing the opportunity for more people of all ages to play tennis in Harrow. Harrow currently has physical activity levels that are below the London and national averages.

### **2. Current Situation**

2.1 The public tennis courts in Harrow's parks are currently available on a turn up and play basis with no booking facility available and are free to use at all times.

2.2 An assessment of the public tennis courts in all the Harrow's parks by the Lawn Tennis Association (LTA) identified that the majority of the courts as detailed in section 3.1 below were either in an unplayable, very poor, or poor condition. The only parks where the tennis courts were identified as being in a good or very good condition were Pinner Village Gardens, Rayners Mead, and West Harrow Recreation Ground.

2.3 Sport England's Active Lives data published in November 2021 for the period May 2020 to May 2021 showed that the percentage of inactive people in Harrow (less than 30 minutes activity a week) was 37.2% compared to 26.7% for London, and 27.5% for England.

2.4 From the 1<sup>st</sup> of April 2022 local Authorities are able to apply for capital funding from the LTA and Department Digital, Culture, Media and Sport (DCMS) Renovation Fund to renovate tennis courts in parks. Total funding of £30 million is being made available until 2024 to bring courts up to a playable standard and to increase the number of people playing tennis and to provide more tennis coaching and competitive tennis opportunities. Local Authorities can apply for funding to repair and resurface the courts, repair fencing, and to install gate access technology. The funding programme also enables the introduction of an online booking system. Whilst local authorities can include match funding as part of their application there is no requirement to do so. Local authorities need to confirm their agreement to fund a sinking fund, ongoing maintenance costs, as well as the ongoing costs associated with the access gates. The introduction of pay and play will ensure that the courts can be maintained to a good standard with the income generated being reinvested into the courts. The sinking fund would be funding that would be kept aside by the Council each year so that when the courts need resurfacing at the end of their life (usually 10-15 years, depending on their usage) there will be

funding available for this. The LTA requires local authorities to maintain a sinking fund of £1,200 per court per annum.

### 3. Why a Change is Needed

3.1 The tennis courts in several of Harrow's parks are in an unplayable, very poor or poor condition. The Council does not have the capital funding available to bring these courts up to a playable standard, and limited maintenance budget available to maintain all the courts to their present condition. The tennis courts (37 in total) in Harrow identified as forming part of an application for investment from the LTA's renovation fund are as follows:

Park	Number of Courts	Current Condition
Byron Recreation Ground	3	Unplayable
Centenary Park	2	Unplayable
Chandos Recreation Ground	3	Average
Harrow Recreation Ground	4	Very Poor
Harrow Weald Recreation Ground	4	Average
Headstone Manor Recreation Ground	6	Unplayable
Kenton Recreation Ground	2	Average
Montesole Playing Fields	2	Average
Pinner Village Gardens	2	Good
Queensbury Recreation Ground	2	Disappeared except old fence parts and posts
Rayners Mead	2	Very Good
Roxeth Recreation Ground	2	Average
West Harrow Recreation Ground	3	Very Good

3.2 The tennis courts at Harrow Weald Recreation Ground, Kenton Recreation Ground, Pinner Village Gardens, Rayners Mead, Roxeth Recreation Ground, and West Harrow Recreation Ground would just require the installation of a gate to enable gate access control to the courts as the courts are already in a playable condition. The pricing strategy to be introduced for the tennis courts at West Harrow Recreation Ground will be dependent on the current grant agreement in place with the London Marathon Trust Fund for these courts.

3.3 The LTA's penetration rates (which identify the potential number of users of the tennis courts in the parks) have established that the courts at all the proposed parks would have a high level of demand from the resident population in the local areas, with all having penetration rates of over 1000. The penetration rates have been calculated from the number of people who live within a 10-minute drive from the park who have been identified as being likely to play tennis if they had the opportunity to do so.

3.4 The public will be able to book a court in advance, using the LTA's preferred 'Clubspark' booking system, so that they know they will be able to use a court at a specific time and that the court will be to a good standard. A separate online platform 'Rally' enables members of the public to find out where courts are available locally. Through the online booking app members of the public of all ages can also sign up for coaching sessions or participate in a tennis programme. The LTA will also assist in the setting up of a competitive tennis offer in the borough by the creation of a local tennis league. This will enable the public to play matches against players of a similar ability.

3.5 In order to ensure that the tennis courts can be maintained to a good standard and are financially sustainable in the long term a pricing strategy would be introduced. This would include pay and play periods with the income generated being reinvested into maintaining the courts including a sinking fund. A benchmarking exercise of hourly charge rates currently in place in other London boroughs for pay and play hours has been undertaken. In boroughs neighbouring Harrow the charge for peak hours (weekday evenings and weekends) varies from £4 per hour to £8 per hour. Most authorities have different pricing for peak and off-peak periods (weekdays – daytime), and some authorities have concessionary rates for those under 16, those with disabilities, and those aged 65+. Some authorities have introduced season tickets for those who want to play more regularly at an affordable rate. To maximise take up and to address income inequality the council can set aside free weekly tennis sessions at a minimum of 30% of the parks involved. This is in accordance with the LTA's criteria for usage and will help drive up activity levels and will enable residents to play tennis regardless of income. Free sessions can include the rental of tennis rackets and tennis balls to ensure that the whole community are able to play tennis.

3.6 The LTA's Renovation Fund application process is in two stages. An LTA Funding Panel will assess applications based on the estimated costs that have been identified from the LTA's Technical Surveys. The estimated costs for the renovations work to Harrow's courts is £445,675. The LTA has approved Harrow's Stage 1 application for this funding. The costs will then be finalised by the procurement process that would be undertaken by the LTA using their National Framework. The LTA Funding Panel would then make a final decision as to whether to approve the funding based on the bidders' submitted prices via the LTA's National Framework. It would be after this second stage that the Council would enter into the funding agreement with the LTA. There is no requirement for match funding from local authorities and the Council will only proceed with the funding agreement if the full capital cost of the renovation works is met from the grant award. The LTA also considers in its assessment of funding applications areas which are identified as having high levels of deprivation – relevant Harrow parks would include Byron Recreation Ground, Harrow Recreation Ground, Harrow Weald Recreation Ground, Headstone Manor Recreation Ground, and Roxeth Recreation Ground. The contract for the tennis courts' renovation works will be between the Council and the

contractor procured through the LTA's National Framework. There will be a separate agreement between the LTA and the Council for the grant funding awarded to the Council for the renovation works subject to a successful funding application.

3.7 Once renovated the tennis courts can either be managed in-house or outsourced to an operator following a procurement process. The preferred option is to enter into a contract with a tennis operator procured using a competitive tender process. If outsourced the operator would retain the income generated from the use of the courts. The procurement strategy for appointing an operator to manage the courts would detail the exact financial arrangements to be included as part of the contract, but there would be a requirement for the operator to pay the Council £42k annually for the sinking fund requirement. As part of the procurement process for a tennis operator, bidders will be required to propose a pricing strategy that meets the following requirements:

- Promotes the principles of equality of access and sustainability
- Includes pricing for pay and play for peak and off-peak periods (peak periods are defined as weekends and after 5pm Mondays to Fridays)
- Generates an income that ensures the management of tennis courts is financially sustainable and enables future reinvestment into the tennis courts
- Provides some free weekly coach led sessions at a minimum of 30% of the parks included in the contract. This is to include the courts at West Harrow Recreation Ground which have received grant funding from the London Marathon Trust Fund (LMTF). The LMTF have stipulated that there must continue to be some free coach led sessions at the site.
- Includes concessionary rates for those aged under 16, 65+, and those with a disability.

## 4. Options Considered

4.1 **Option A: To enter into a funding agreement with the Lawn Tennis Association (LTA) for capital funding to renovate Harrow's tennis courts at several Harrow parks, if the Council's application to the LTA's Renovation Fund is successful, to increase participation in tennis. To introduce a booking system and pricing strategy for use of the courts, and to appoint an operator to manage the renovated tennis courts following the completion of a tendering process.** This option will ensure that there is investment in the courts at 13 of Harrow's parks to bring them up to a playable standard with the introduction of pay and play ensuring that there is sufficient funding generated so that the courts can be maintained in the future. Procuring a specialist tennis operator to manage the courts will ensure that the tennis offer benefits from the operator's expertise, including coaching sessions, and that the Council benefits from their economies of scale, and will mean that the financial risk will lie with the operator and not the Council. There would also be the potential for there to be profit share in operation that could then be invested in the parks. The tennis operator would be responsible for the pricing strategy, but

the LTA would require as a condition of their funding that there is an operator led free weekly tennis offer in a minimum of 30% of the parks to ensure that tennis is accessible to all. Most other London boroughs who have introduced a booking system with pay and play also have concessionary rates in operation.

#### **Option A is recommended**

- 4.2 **Option B: To enter into a funding agreement with the Lawn Tennis Association (LTA) for capital funding to renovate Harrow's tennis courts at several Harrow parks, if the Council's application to the LTA's Renovation Fund is successful, to increase participation in tennis. To introduce a booking system and pricing strategy for use of the courts, and the renovated tennis courts to be managed in-house by the Council.** This option will ensure that there is investment in the courts at 13 of Harrow's parks to bring them up to a playable standard with the introduction of a pay and play ensuring that there is sufficient funding generated so that the courts can be maintained in the future. Whilst pay and play would be introduced the LTA would require as a condition of their funding that there is operator led free weekly tennis offer in a minimum of 30% of the parks to ensure that tennis is accessible to all. Most other London boroughs who have introduced a booking system with pay and play also have concessionary rates in operation.
- 4.3 Managing the courts in-house would mean that Harrow's tennis offer would not benefit from a specialist operator's expertise or economies of scale and would require additional staff resources to manage and maintain the courts. A contractor would need to be engaged just to operate the coaching sessions, and all the financial risk would lie with the Council.

Option B is not recommended

- 4.4 **Option C: To not enter into a funding agreement with the Lawn Tennis Association (LTA) for capital funding from the LTA's Renovation Fund to renovate tennis courts in Harrow's Parks. No booking system will be introduced, and the courts will remain free to use at all times. There will, however, be no investment in the tennis courts many of which are currently in a poor condition and no identified future maintenance funding for the courts.** This option would result in the condition of the tennis courts in Harrow's parks continuing to deteriorate and mean that they all become increasingly unplayable. This would result in a reduction in participation in tennis rather than an increase. The public will not be able to book a good standard court in advance, and there would not be an improved coaching and competitive tennis offer.

Option C is not recommended.

## **5. Ward Councillors' comments**

- 5.1 The recommendations in this report would affect all wards. There will be consultation with Ward Councillors through the consultation process.

## 6. Risk Management Implications

6.1 Risks included on corporate or directorate risk register? **No**

6.2 Separate risk register in place? **Yes**

6.3 The relevant risks contained in the register are attached/summarised below. **Yes**

6.4 The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
1. Harrow Council's application to the Lawn Tennis Association (LTA)'s Renovation Fund is not successful.	<ul style="list-style-type: none"> <li>▪ The Council will work closely with the Lawn Tennis Association (LTA) on the funding application to ensure that it meets all the necessary criteria.</li> <li>▪ If the application is not successful, the renovation of the tennis courts will not proceed meaning that there is not financial risk to the Council.</li> </ul>	Green
2. There are delays in completing the refurbishment of the courts and/or in procuring a tennis contractor to then manage the courts resulting in the LTA's deadline for completing the project not being met.	<ul style="list-style-type: none"> <li>▪ The Council will engage with the LTA at any early stage and work closely with them on completing the refurbishment works via the LTA's National Procurement Framework</li> <li>▪ There will be early engagement with the Council's Procurement team regarding the tendering process to appoint a tennis contractor to manage the tennis courts once refurbished.</li> <li>▪ The LTA has until 2024 to ensure that all the budget for refurbishing tennis courts has been spent.</li> </ul>	Amber



Risk Description	Mitigations	RAG Status
3. There is a rise in costs for refurbishing the courts	<ul style="list-style-type: none"> <li>▪ The costs for the various aspects of the refurbishment has been confirmed by the LTA as part of the application process, and the refurbishment work will be undertaken by a contractor from the LTA's National Procurement Framework. The Council would not therefore be responsible for any increase in costs.</li> </ul>	Amber
4. Insufficient income is generated from the use of the refurbished courts to offset the ongoing maintenance costs.	<ul style="list-style-type: none"> <li>▪ A financial analysis has been undertaken of the minimum income required to be generated from the tennis courts with ongoing annual costs confirmed by the LTA. This includes a benchmarking of the charges in place by other London boroughs for play and play and an analysis of occupancy levels that would be required to generate sufficient income at different charging levels</li> <li>▪ It is proposed to procure for a tennis operator to manage the courts once refurbished who will be experienced in managing tennis courts with the financial risk lying with the tennis operator rather than the Council.</li> </ul>	Green

## 7. Procurement Implications

7.1 The procurement of a contractor for the construction works would be completed via the LTA's National Procurement Framework. This is a compliant procurement route through which the LTA would procure the contractor on behalf of the Council. Following the procurement, the Council

will enter into a contract with the selected supplier who will undertake the works.

7.2 The procurement of a tennis operator would be undertaken using a competitive tender process to maximise quality and value of the services to be delivered. The council's procurement team will engage service commissioners to advise on and agree suitable evaluation criteria and weightings and agree the term of the proposed contract. The council will explore and decide the best contract model between the council and the operator. This may include a straight/conventional contract, a works concession contract or any other model that will be most effective and also yield value for money to the council.

## **8. Legal Implications**

8.1 The respective approvals sought in this report are consistent with one another and with the underlying council objective to renovate the tennis courts and maintain them at a playable standard. To this extent the objective of the council and the means to achieve these are lawful.

8.2 The council will remain the Contracting Authority in relation to the procurement of the renovation works contract, while employing LTA to manage the process and this is in order.

8.3 The Procurement of a specialist tennis operator to manage the courts is also in line with the council's best value obligations in law.

8.4 Therefore, the approvals sought are lawful, consistent with the council's legal obligations regarding fairness, transparency, equality, and value for money. They are also in line with and adhere to the provisions of the Public Contract Regulations 2015 and of the Council's Contract Procedure Rules.

## **9. Financial Implications**

9.1 Lawn Tennis Association (LTA) and Department Digital, Culture, Media, and Sport (DCMS) have launched the Renovation Fund to renovate tennis courts in parks. Funding applications open in April 2022. 37 tennis courts in 13 parks have been identified as suitable to be included in the funding application. Technical survey has been undertaken by LTA to inform the detailed renovation works required and estimated costs. Harrow's funding application has been approved at this Stage 1 of the process. The works will now be procured via the LTA's National Framework, and this will confirm the final costs. The LTA would then complete the final stage of the funding process to confirm the grant award. There is no capital match funding requirement from the Council. In order to ensure that there is no net cost impact in the Capital Programme, the Council would only enter into a funding agreement with the LTA should the full costs of renovation be met from their capital grant.

9.2 Under the terms and conditions of the grant, there is a requirement to set aside a sinking fund for future replacement of the courts. This is set at £1,200

per court per annum. With 37 tennis courts in the funding application, the total sinking fund requirement is £44,400 per annum.

9.3 Other on-going running costs include cleaning & litter picking, general repairs, maintenance, and other costs associated with access gates. This is estimated at £30k per annum.

9.4 The introduction of a pay and play scheme will ensure that income is generated to fund on-going costs of the tennis courts. This report recommends the use of a third-party operator to run the tennis courts via a competitive procurement process, therefore pay and play prices are to be determined by the successful bidder. However, the pricing strategy will set out parameters within which the operator needs to follow.

9.5 In order to meet the sinking fund requirement and direct running costs, a minimum income of £74k would be required. For illustration purpose, this level of income could be achieved if around 11% of the operating times of all tennis courts were paid for at an average price of £5 per hour. The table below provides a sensitivity analysis to illustrate the potential income level.

No of courts	Available hours per year	Income @ 50% chargeable hours	Income @ 25% chargeable hours	Income @ 12.5% chargeable hours	Income @ 11% chargeable hours	Income @ 10% chargeable hours	Income @ 7.5% chargeable hours	Income @ 6.5% chargeable hours
37	141,414	£353,535	£176,768	£88,384	£77,778	£70,707	£53,030	£45,960

9.6 Other sources of income include annual membership subscriptions and coaching sessions. The exact delivery model will be the responsibility of the third-party operator.

9.7 The proposed procurement strategy will be that the third-party operator is required to provide a fixed guaranteed income per annum at a minimum level of £44,400 (equivalent to the sinking fund requirement) and propose a profit share arrangement for surpluses achieved from the management of the tennis courts. The operator will also be responsible for the on-going running costs of the courts. The scheme must operate on the basis of self-financing and does not result in any revenue burden, otherwise would create a financial risk to the Council.

9.8 The sinking fund will be held in an earmarked reserve for future replacement of the tennis courts, ensuring a long-term sustainability of the facility. This will ensure that funding is available when capital investment is required in future, avoiding the reliance on capital borrowing.

9.9 The option of appointing a third-party operator will minimise the financial risks to the Council. Should the tennis courts be managed in-house, there would be customer support, administrative and other back-office costs.

## **10. Equalities implications / Public Sector Equality Duty**

10.1 An Equalities Impact Assessment (EqIA) has been conducted (Appendix 1). The EqIA identified that the recommended option would not have an adverse impact on any of the protected characteristics. The proposals, which will bring all the tennis courts up to a playable standard, will improve access to tennis for the community and will have a positive impact for people of all ages, for those with a disability (with specific sessions for this target group to be held), and for all race/ethnic groups. There would still be some free tennis sessions available at some of the parks and the Council would work with the tennis operator to ensure that the charging rates for the play and play sessions are affordable for all including for children and older people. Tennis operators would be expected to detail in a tennis development plan what types of coaching sessions they would provide, including for people with disabilities, as part of the procurement process for a tennis operator. The operator would also be expected to offer competitive tennis opportunities.

## **11. Council Priorities**

11.1 This decision will support the Council priority of addressing health Inequalities by providing all residents with playable tennis courts that can be booked in advance, coaching sessions for all ages, and the opportunity to play competitive tennis against others of a similar ability. There would be pay and play sessions in place with the income generated ensuring that the courts can be maintained to a good standard, but there would also continue to be some free sessions available.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer:** Jessie Man  
Signed on behalf of the Chief Financial Officer  
**Date:** 20/05/22

**Statutory Officer:** Nhlanhla Mahlangu  
Signed on behalf of the Monitoring Officer  
**Date:** 13/05/22

**Chief Officer:** Dipti Patel  
Signed off by the Corporate Director - Place  
**Date:** 06/06/2022

**Head of Procurement:** Marzuki Haji  
Signed on behalf of the Head of Procurement

**Date:** 16/05/22

**Head of Internal Audit:** Susan Dixon

Signed by the Head of Internal Audit

**Date:** 24/05/22

## **Mandatory Checks**

**Ward Councillors notified:** NO - impacts on all Wards

**EqIA carried out:** YES

**EqIA cleared by:** Micah McLean

## **Section 4 - Contact Details and Background Papers**

**Contact:** Tim Bryan – Head of Service, Culture and Leisure. Tel: 07917076800. Email: [tim.bryan@harrow.gov.uk](mailto:tim.bryan@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee**

**NO**

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## Equality Impact Assessment (EqIA)



### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Investment into Harrow's Tennis Infrastructure	<b>Date EqIA created</b> 12/04/22
<b>Name and job title of completing/lead Officer</b>	Tim Bryan – Head of Service, Culture and Leisure	
<b>Directorate/ Service responsible</b>	Place/Inclusive Economy, Leisure and Culture	
Organisational approval		
<b>EqIA approved by Equality, Diversity and Inclusion Team</b>	<b>Name: Micah McLean</b> <b>Policy Officer – equality, Diversity and Inclusion Team</b>	<b>Signature</b> <i>mmclean</i> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval</b> 06/05/2022



## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed after you have completed sections 2 - 5)

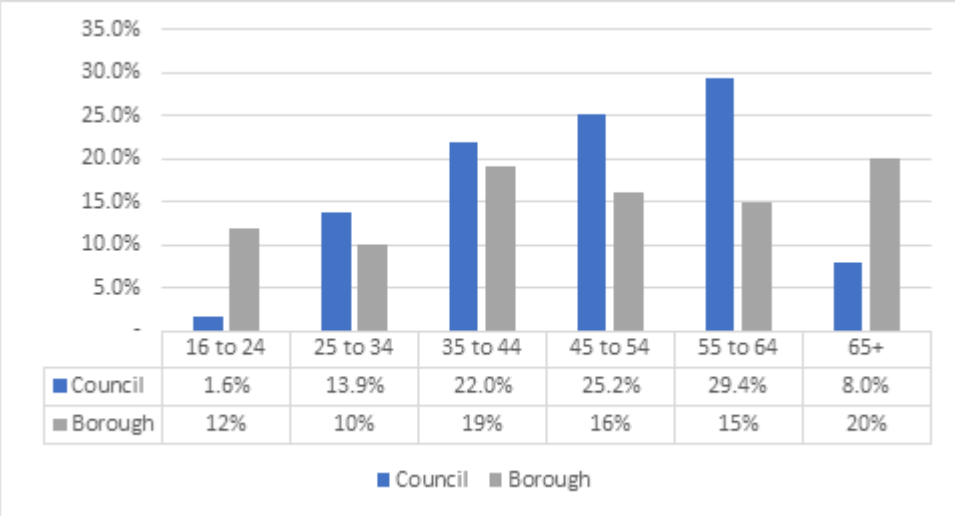
**a) What is your proposal?** To enter into a funding agreement with the Lawn Tennis Association (LTA) if the Council's application to the LTA's Renovation Fund is successful for capital funding to improve tennis facilities at a number of Harrow's parks that are currently in a poor condition to increase use of the courts and improve levels of physical activity in Harrow. This will include the resurfacing of the courts, repairs to fences, as well as the introduction of gate access technology and an online booking system. A pay and play system would be in operation with the introduction of charging for members of the public to hire the courts per hour. There would, however, be a free weekly tennis session at some of the courts. This would be in accordance with the LTA's criteria for usage that there is a free weekly tennis session at a minimum of 30% of the parks involved to address income inequality and maximise take up. The income generated will be reinvested into maintaining the courts to a high standard ensuring that the courts are sustainable going forwards. It is proposed that the courts would be operated by a tennis operator who will also deliver coaching sessions to help increase the number of people playing tennis and to enable players to develop their skills.

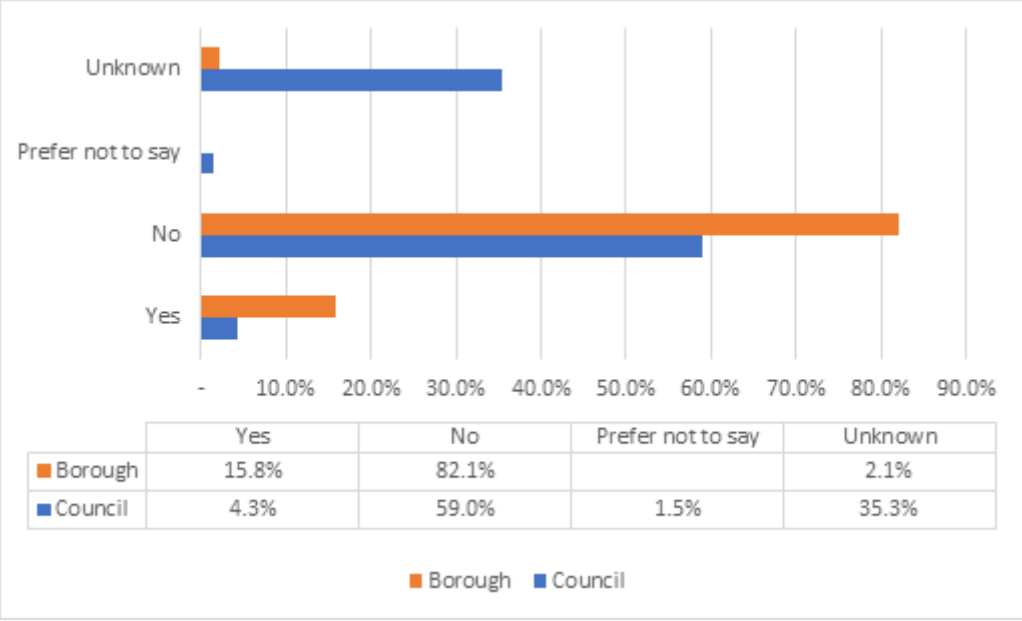
### **b) Summarise the impact of your proposal on groups with protected characteristics**

No protected characteristic would be adversely affected by these proposals. Renovating the tennis courts to a playable standard and introducing a pricing strategy for usage that will ensure the courts can be maintained in the future will improve access to tennis for the whole community. There will still be some free weekly session at some of the courts to ensure that there is a maximisation of usage and to address income inequality. A tennis operator will be procured to manage the refurbished courts and will provide coaching sessions and the opportunity for the public to play competitive tennis if they wish to so. This will have a positive impact for people of all ages, for those with a disability with specific sessions for this target group to be held by the operator, and for all race/ethnic groups. The new access gates will be fully accessible being the required width for wheelchair users and the gate keypad located at a height accessible to all. There would be an online booking system introduced to improve the customer's journey to hiring a court making the process simpler and easier, but the tennis operators would also be expected to detail how the courts could be booked for those with limited access to a computer or who have limited digital skills.

### **c) Summarise any potential negative impact(s) identified and mitigating actions**

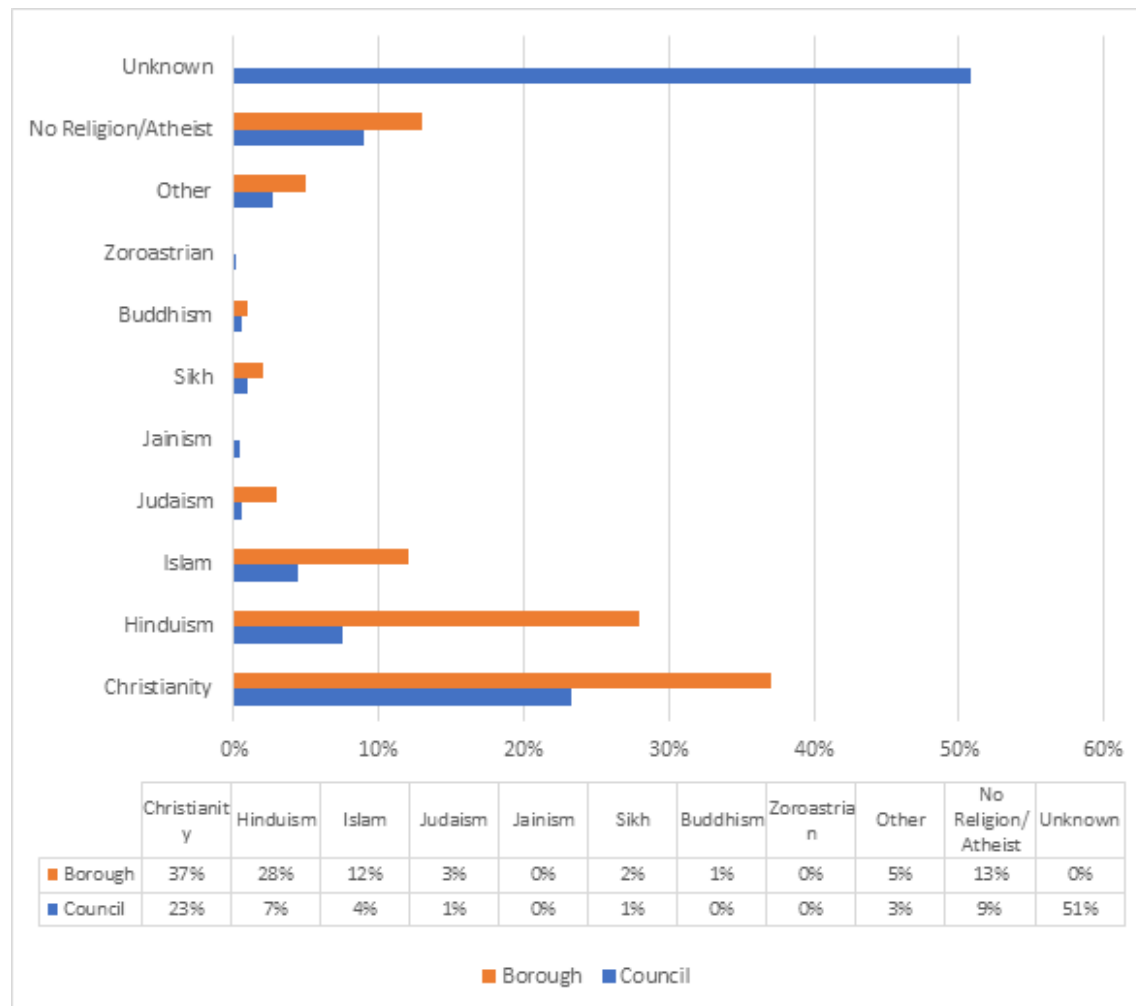
No specific negative impact has been identified for any of the protected characteristics from these proposals as detailed in b) above.

2. Assessing impact																										
Protected characteristic		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact																								
For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.		Positive impact	Negative impact		No impact																					
			Minor	Major																						
<b>Age</b>	<p>The resident population of Harrow according to the 2020 mid-year population estimates was 252,338. According to the Annual Workforce Equalities Report 2020- 2021 the age demographic of our resident population is as demonstrated below:</p>  <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>16 to 24</th> <th>25 to 34</th> <th>35 to 44</th> <th>45 to 54</th> <th>55 to 64</th> <th>65+</th> </tr> </thead> <tbody> <tr> <td>■ Council</td> <td>1.6%</td> <td>13.9%</td> <td>22.0%</td> <td>25.2%</td> <td>29.4%</td> <td>8.0%</td> </tr> <tr> <td>■ Borough</td> <td>12%</td> <td>10%</td> <td>19%</td> <td>16%</td> <td>15%</td> <td>20%</td> </tr> </tbody> </table> <p>Bringing all the tennis courts up to a playable standard will benefit people of all ages as it will make tennis more accessible and provide opportunities for people of all ages to attend coaching sessions and also to participate in competitive tennis with people of a</p>		16 to 24	25 to 34	35 to 44	45 to 54	55 to 64	65+	■ Council	1.6%	13.9%	22.0%	25.2%	29.4%	8.0%	■ Borough	12%	10%	19%	16%	15%	20%	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	16 to 24	25 to 34	35 to 44	45 to 54	55 to 64	65+																				
■ Council	1.6%	13.9%	22.0%	25.2%	29.4%	8.0%																				
■ Borough	12%	10%	19%	16%	15%	20%																				

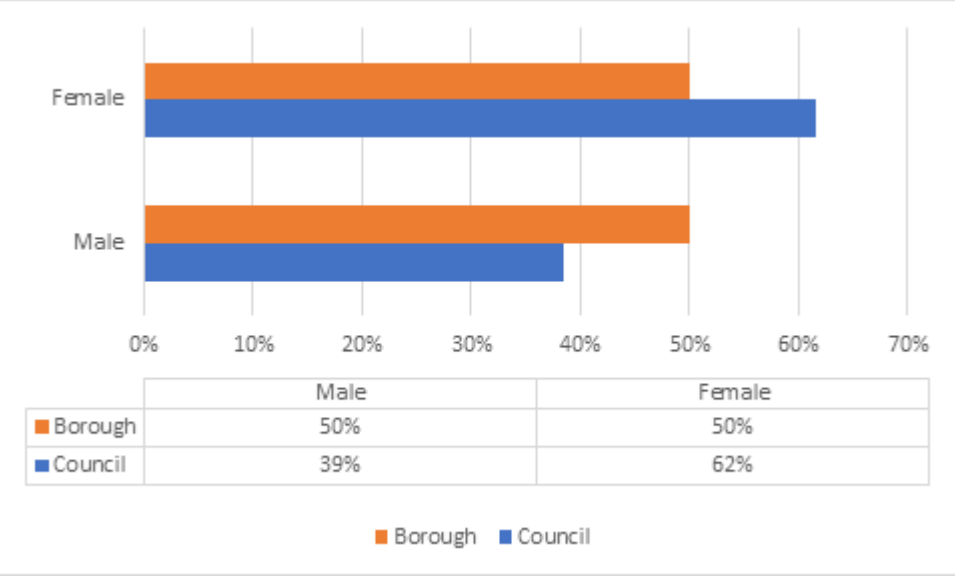
	<p>similar ability if they wish to do so. Whilst the charge rates for the pay and play sessions will be set by the tennis operator, the Council will work with the operator to ensure that the charging rates are affordable for all. There would be an online booking system, but tennis operators would be expected to detail how the courts could be booked for those with limited access to a computer or who have limited digital skills.</p>																			
<p><b>Disability</b></p>	<p>According to the Annual Workforce Equalities Report 2020- 2021, 15.8% of the borough's population discloses a disability. This is indicated below:</p>  <table border="1" data-bbox="472 906 1442 1018"> <thead> <tr> <th></th> <th>Yes</th> <th>No</th> <th>Prefer not to say</th> <th>Unknown</th> </tr> </thead> <tbody> <tr> <td><span style="color: orange;">■</span> Borough</td> <td>15.8%</td> <td>82.1%</td> <td></td> <td>2.1%</td> </tr> <tr> <td><span style="color: blue;">■</span> Council</td> <td>4.3%</td> <td>59.0%</td> <td>1.5%</td> <td>35.3%</td> </tr> </tbody> </table> <p>Bringing all the tennis courts up to a playable standard will benefit people with a disability. The specification for the procurement of a tennis operator would include a requirement to ensure that there are sessions aimed at people with disabilities, and there will be some free tennis sessions available at some of the parks to address income inequality.</p>		Yes	No	Prefer not to say	Unknown	<span style="color: orange;">■</span> Borough	15.8%	82.1%		2.1%	<span style="color: blue;">■</span> Council	4.3%	59.0%	1.5%	35.3%	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
	Yes	No	Prefer not to say	Unknown																
<span style="color: orange;">■</span> Borough	15.8%	82.1%		2.1%																
<span style="color: blue;">■</span> Council	4.3%	59.0%	1.5%	35.3%																

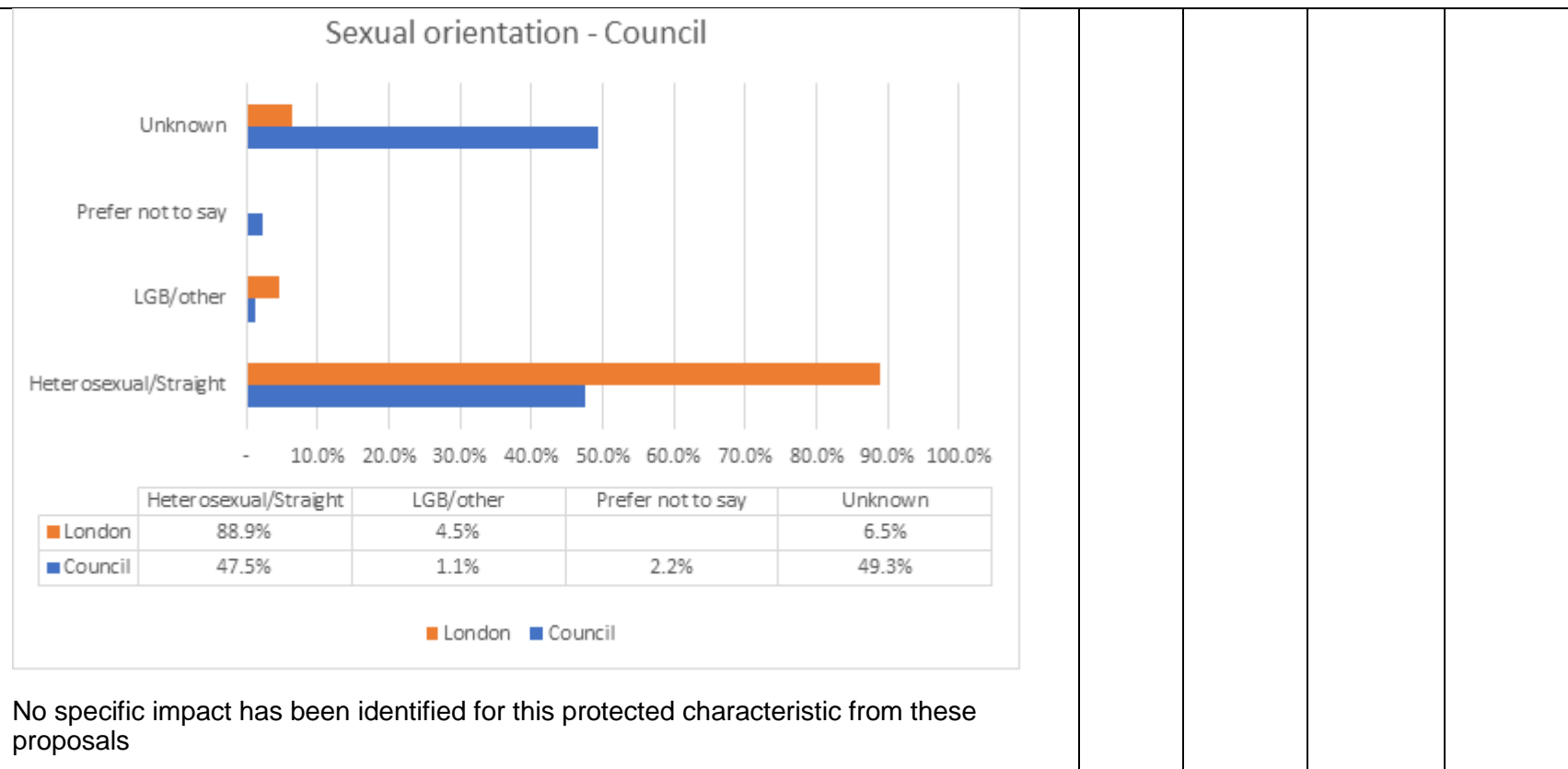
	Whilst the charge rates for the pay and play sessions will be set by the tennis operator, the Council will work with the operator to ensure that the charging rates are affordable for all. New accessible gates will be installed to enable access for everyone. The new gates will be the required width for wheelchair users and the gate keypad will be at a height which is accessible to all.				
<b>Gender reassignment</b>	The only data Harrow currently has on Gender Reassignment is via the Analysis of demand from housing applicants (via Locata): 1 (0.02%) housing applicant has indicated that they are transgender.(Data as of April 2014).  No specific impact has been identified for this protected characteristic from these proposals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	Census data: Harrow has a very high percentage of married couples, with 53.7% of residents aged 16 and older declaring they were in a marriage in 2011. This is above the national level of 46.6%. There was a 27% increase in the number of married people living in Harrow between 2001 and 2011 (Office for National Statistics, 2001 and 2011). Between their inception and January 2012, 107 civil partnership ceremonies took place in Harrow.  No specific impact has been identified for this protected characteristic from these proposals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy and Maternity</b>	The 2020 mid-year estimates showed a decrease of 37 births (3,506 births in total) over 2019 mid-year estimates, a 1% decrease. There was a consistent increase from 2001/02 to 2012/13.  No specific impact has been identified for this protected characteristic from these proposals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p><b>Race/ Ethnicity</b></p>	<p>According to the Annual Workforce Equalities Report 2020- 2021 the race demographic of our resident population is as demonstrated below:</p> <table border="1" data-bbox="488 592 1263 730"> <thead> <tr> <th></th> <th>BA&amp;M-E</th> <th>White</th> <th>Unknown</th> </tr> </thead> <tbody> <tr> <td>■ Council</td> <td>46.4%</td> <td>43.8%</td> <td>9.8%</td> </tr> <tr> <td>■ Borough (GLA)</td> <td>65%</td> <td>36%</td> <td></td> </tr> <tr> <td>■ Borough (Vacc)</td> <td>63%</td> <td>37%</td> <td></td> </tr> </tbody> </table> <p>Black, Asian and Multi-Ethnic residents make up around 65% of our borough's population followed by White groups at 36%. Bringing all the tennis courts up to a playable standard will benefit people from all ethnic groups. There will be some free sessions and concessionary rates targeted towards residents from different ethnicities from disadvantaged socio-economic backgrounds.</p>		BA&M-E	White	Unknown	■ Council	46.4%	43.8%	9.8%	■ Borough (GLA)	65%	36%		■ Borough (Vacc)	63%	37%		☒	☐	☐	☐
	BA&M-E	White	Unknown																		
■ Council	46.4%	43.8%	9.8%																		
■ Borough (GLA)	65%	36%																			
■ Borough (Vacc)	63%	37%																			
<p>At economic backgrounds. <b>Religion or belief</b></p>	<p>The Annual Workforce Equalities Report mentions that Christianity (37%), Hinduism (28%), No religion/ Atheist (13%) and Islam (12%) are the four biggest religious demographics in Harrow. Residents that are of the Jewish faith is 3% of the borough population.</p> <p>The graph below illustrates this data in more detail:</p>	☐	☐	☐	☒																



No specific impact has been identified for this protected characteristic from these proposals

<p><b>Sex</b></p>	<p>The Annual Workforce Equalities Report 2020-2021 indicates that the percentage of residents within Harrow that are male and female is split evenly at 50%. As shown below:</p>  <table border="1" data-bbox="472 675 1375 783"> <thead> <tr> <th></th> <th>Male</th> <th>Female</th> </tr> </thead> <tbody> <tr> <td>Borough</td> <td>50%</td> <td>50%</td> </tr> <tr> <td>Council</td> <td>39%</td> <td>62%</td> </tr> </tbody> </table> <p>No specific impact has been identified for this protected characteristic from these proposals</p>		Male	Female	Borough	50%	50%	Council	39%	62%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Male	Female												
Borough	50%	50%												
Council	39%	62%												
<p><b>Sexual Orientation</b></p>	<p>The Annual Workforce Equalities Report 2020-2021 indicates that the percentage of LGBTQIA+ residents within London is 4.5%. See below:</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>									



**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No   

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below



**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No   

If you clicked the Yes box, Include details in the space below

**3. Actions to mitigate/remove negative impact**

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

65

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### **Include details in the space below**

The proposal to apply for funding to bring the tennis courts up to a playable standard in several of the parks and introduce a pricing strategy with a weekly free session at some of the parks to address income inequality and maximise usage will enable sustainable greater participation in tennis in the borough for all ages and abilities. Coaching sessions will also be introduced and there will also be the opportunity for people to play competitive tennis if they wish to do so. This will help to meet the sport and physical exercise needs of the whole community and bringing different communities together.

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

**Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

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**Report for: Cabinet**

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<b>Date of Meeting:</b>	23 June 2022
<b>Subject:</b>	Inter Authority Agreement for the Harrow / Brent Special Needs Transport (HBSNT)
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dipti Patel - Corporate Director, Place
<b>Portfolio Holder:</b>	Cllr Anjana Patel – Portfolio Holder for Environment and Community Safety
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	None

## Section 1 – Summary and Recommendations

This report sets out a proposal to make arrangements for two Inter Authority Agreements (IAA) between Harrow and Brent Councils for the provision of Shared Special Needs Transport Services (HBSNT)

### **Recommendations:**

Cabinet is requested to:

1. Approve Harrow entering a new 12-month maximum IAA arrangement for the provision of special needs transport to the London Borough of Brent from August 2022.
2. Approve Harrow to agree terms and finalise a new longer-term IAA, dependent on the outcome and informed by a joint review of services, between both Councils.
3. Delegate authority to the Corporate Director of Place in consultation with the Director of Finance and the respective Portfolio Holders for Environment & Community Safety and Finance to finalise and execute the above two recommendations.
4. Approve Harrow to lead on any necessary procurement exercises for associated third party contracts over the term of the IAA's directly related to the provision of HBSNT (such as fleet, taxi, labour supply, IT).

### **Reason (for the recommendations):**

To ensure the respective Councils can discharge their statutory functions in the provision of this critical service transporting Children, Young People and Adults with special needs.

## Section 2 – Report

### 1. Introductory paragraph

- 1.1 Approval of the recommendations set out in this Cabinet Report will enable Harrow Council to continue provision of its Special Needs Transport Services to the London Borough of Brent under the terms of the Inter Authority Agreement (IAA).

### 2. Options considered

- 2.1 The options considered were:

- a) **Cessation of current arrangements on expiration of current IAA – option rejected** - The current IAA has been in place since August 2016 and has successfully delivered initiatives such as route share which reduces costs by around £250,000 each year for Harrow and Brent Councils, reduced carbon footprint through less vehicle movements,

reduced management costs and economies of scale generated by shared contracts. Cessation of current arrangements would have an adverse operational and financial impact to both Councils and the HBSNT Service Users.

- b) **Immediately agree new long-term IAA now - option rejected** - There is a current review of Services being undertaken by an external consultant commissioned by Brent. The review will not be published until after the IAA current expiration date 31 July 2022. The review findings will make recommendations for HBSNT service improvements for the benefit of respective Councils and their Service Users. It is considered prudent to jointly review and utilise the review findings (once published) to shape a long-term IAA.
- c) **Up to 12-month new IAA pending the findings of the above review on the future delivery of services – option recommended** – A shorter term IAA for up to 12 months that mirrors the current terms will provide both Councils the opportunity to properly consider the service review findings and develop / agree a new long term IAA taking those findings into account.

### **3. Background and Current Situation**

- 3.1 Both Harrow and Brent Councils have a statutory duty to provide transport assistance to eligible children who access education and college placements. Eligible children are those that have physical and emotional needs that make the use of personal or public transport inappropriate.
- 3.2 Brent and Harrow Councils entered an Inter Authority Agreement which commenced in September 2016 that expires on the 31 July 2022.
- 3.3 In order to continue delivery and improvement of services an IAA is needed to underpin and govern the shared services arrangements.
- 3.4 Brent Council is currently carrying out a review of the service. Any long-term shared service arrangements beyond 31 July 2022 will be subject to the outcomes of the service review. Therefore, it is not appropriate to enter into a longer agreement at the present time.
- 3.5 The respective Councils have a history of delivering successful shared services. The current Special Needs Transport arrangements have yielded significant benefits to both Councils since September 2016 which would otherwise have not been possible as set out in section 2.1(a) of this report.
- 3.6 Harrow is responsible for operational service delivery of the shared service from its Harrow Council Hub, with Harrow's leading on the required procurement and management of third-party supporting contracts such as labour, taxi, fleet, and related IT.

- 3.7 The current number of clients transported on behalf of Brent is approximately 1228 SEN children and 119 adults. With regards to the Harrow service there are 735 SEN children transported and 125 adults
- 3.8 To give an idea of the scale of the transport services provided on behalf of Brent there are currently 92 in house operated routes and 223 taxi routes to transport the total number of clients. By comparison there are 74 in house operated routes and 123 taxi routes for transporting clients in Harrow.
- 3.9 Year on year service demand increases by an average of around 5%.

#### **4. Implications of the Recommendation**

- 4.1 The overall arrangement will continue to be governed by both Authorities through the joint SNT Board which will be underpinned by the proposed IAA's. The IAA's will set out the financial arrangements between the Councils and are based on the cost of the level of service being provided.
- 4.2 The IAA's will include provision for:
- a) Objectives and partnership working
  - b) General operational arrangements
  - c) Governance including the Special Needs Transport Advisory Board and change control mechanisms that govern how the increase in activities
  - d) are agreed, costed and financed
  - e) Performance review meetings that govern the discussions on key
  - f) performance indicators and the rectification plans that will underpin the
  - g) resolution of any non/underperformance
  - h) Monitoring reports to track financial savings and operational performance of the shared service
- 4.3 The proposal represents a continued business opportunity for both Councils as it provides the opportunity for both Councils to gain the benefits of economies of scale in contractual arrangements, greater efficiencies in operational front-line staffing (drivers and escorts), shared policies from cross working with seconded staff, systems and processes.
- 4.4 It also provides the opportunity for better utilisation of Harrow premises assets to create efficiencies of the combined service in the following areas:
- a) Premises – Harrow is able to offer shared fleet parking and office facilities at the Harrow Council Hub.
  - b) Route sharing and route reduction operates on border routes.
  - c) Fleet greater economies of scale and market leverage are created through the pooling of demand from respective Councils.
  - d) Systems and processes – this includes the use of a single routing and scheduling IT system.



- e) Contractual arrangements – (Transport Service Taxi Framework and the Labour Supply Contract with NR Limited are currently in term and provide better contractual terms given the larger value contracts).

4.5 In addition to the operational and contractual efficiencies above, there is scope to achieve further savings from demand management activities. These will be jointly reviewed by the SNT Advisory Board under the IAA arrangements.

4.6 Future policy direction and commissioning actions of the Education/Children and Adults service areas will influence the level of savings or cost pressures in the shared service. Although the service will make its mission to keep operational costs at a minimum, it is unable to influence demands. The commissioning departments of both Councils will be required to review demand management activities. It is recommended that both Councils jointly develop a refreshed Transport Assistance Policy that would cover:

- a) Independent travel training (ITT)
- b) Use of personal travel budgets
- c) Free travel for travel buddies

4.7 Harrow already has a task and finish group exploring demand management issues. The results of this will be discussed as part of continuous improvement in the continued provision of service.

## **5. Performance Issues**

5.1 The IAA has a detailed suite of KPIs against which the service will be measured. Service data will be collected by the Contract Manager and reported to the HBSNT Advisory Board, on a quarterly cycle. This will be used as a part of monitoring the performance of the service and the achievement of pre-set targets and objectives. These targets will include the standard national indicators such as time spent on the buses. Where performance targets for KPI's have not been achieved and reported to the Contract Manager as a part of the agreed monthly reporting cycle, it is the responsibility of the Contract Manager to inform members of the Advisory Board of the situation and agree remedial action.

5.2 The Advisory Board will determine the communication process to other stakeholders who need to be made aware of situations when performance has not been achieved and remediation plans are in place.

## **6. Environmental Implications**

6.1 The primary environmental impacts arising from the activities are:

### **a) Offices and buildings energy use:**

The services will be hosted /operated from the Harrow Central Hub which is a modern and fit for purpose facility. Energy is purchased from green sources

and Photo Voltaic Solar Panels will provide a proportion of the required energy to support buildings systems.

**b) Fleet related activity:**

The current fleet complies with the required legislative emission levels and is certified to Euro VI standard. It has the lowest CO2 emissions achievable within budget. Opportunities to further reduce emissions levels are continually sought through route optimisation and reduction, shared service routes, driver behaviour management and grant funding applications.

**7. Risk Management Implications**

7.1 The proposed IAA will underpin governance and control of all risks associated with the HBSNT Shared Services arrangements.

7.2 There is a detailed risk register from 2021 that underpins all associated risks for the IAA. A review of the register is planned for 2022 as part of ongoing risk management. It is not expected that there will be any significant changes arising.

7.3 Risks included on corporate or directorate risk register? No

7.4 Separate risk register in place? Yes, but not current

7.5 The relevant risks contained in the register are attached/summarised below. Yes

7.6 The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Value for money is not achieved	<ul style="list-style-type: none"> <li>▪ Costs are agreed between parties at the HBSNT Board prior to services commencement</li> <li>▪ Financial governance and control processes are contractual and set out in the IAA</li> </ul>	Green
The IAA is not agreed creating significant unbudgeted cost increases and having a significant adverse effect on operational service delivery to both Councils	<ul style="list-style-type: none"> <li>▪ A review of services is underway and both Councils will work to reach agreement in the spirit of collaboration minimizing impact to the benefit of both parties</li> <li>▪ Approval of this cabinet report will provide the</li> </ul>	Amber

Risk Description	Mitigations	RAG Status
	continue and improve current arrangements in place	
Dispute between parties to the IAA	<ul style="list-style-type: none"> <li>▪ Defined dispute resolution procedure is contained within the IAA</li> <li>▪ Spirit of collaboration between the Councils</li> </ul>	Green
Procurements of associated third party contracts over the term of the IAA are not legally compliant or compliant with internal governance.	<ul style="list-style-type: none"> <li>▪ All procurements will be undertaken in compliance with the Public Contract Regulations and Harrow Council's Contract Procedure Rules</li> <li>▪ All procurements will be subject to the terms of the IAA</li> </ul>	Green

## 8. Procurement Implications

- 8.1 Regulation 12(7) of the Public Contract Regulations 2015 (“the Regulations”) establishes that where two or more local authorities enter into a contract exclusively, between themselves provided the arrangement fulfils three conditions – then the contract would fall outside the scope of the Regulations; therefore, there is no requirement to put the service out to a competitive tender exercise.
- 8.2 The following conditions must be met in order for both Councils to benefit from regulation 12(7):- “(7) A contract concluded exclusively between two or more contracting authorities falls outside the scope of this Part where all of the following conditions are fulfilled:— (a) the contract establishes or implements a co-operation between the participating contracting authorities with the aim of ensuring that public services they have to perform are provided with a view to achieving objectives they have in common; (b) the implementation of that co-operation is governed solely by considerations relating to the public interest; and (c) the participating contracting authorities perform on the open market less than 20% of the activities concerned by the co-operation.”
- 8.3 Any procurement(s) during the term of the proposed IAA agreement(s), that are required for the delivery of Harrow Council's obligations set out in the IAA will be undertaken compliant with the Public Contract Regulations 2015 and the Contract Procedure Rules.

## **9. Legal Implications**

- 9.1 Harrow and Brent Council are able to enter into an Inter Authority Agreement pursuant to the Local Authorities (Goods and Services) Act 1970 (“the 1970 Act”) which authorises local authorities to enter into contracts for the provision of goods and services to other public bodies. Councils falls within the meaning of ‘public bodies’ as defined by the 1970 Act.
- 9.2. The joint Shared Special Needs Transport Service will operate under an Inter Authority Agreement (IAA) to be entered into by Harrow and Brent Councils. This will set out the financial arrangements, as well as the legal and contractual obligations applicable to the parties. The IAA will also set out key performance indicators and service standards.

## **10. Financial Implications**

- 10.1 Under the current IAA, Harrow leads on the delivery of Special Needs Transport service on behalf of Brent. The full costs are recovered from Brent via quarterly invoices. Financial management processes are put in place to review and forecast the costs regularly so that Brent is kept informed on the spend throughout the financial year.
- 10.2 The current IAA expires in July 2022. Any longer-term shared service arrangements are subject to outcomes of the service review that Brent is leading on, therefore it is not appropriate to enter into such an agreement at the present time.
- 10.3 In the new short term (up to 12 months) IAA, it is proposed that the service will operate under the same terms and conditions of the original IAA. Therefore, Harrow will continue to receive a management fee of £103k per annum and rent of £172k per annum for 87 parking spaces at Forward Drive depot. There is currently an income budget in the Transport Service for these.
- 10.4 The new short-term arrangement does not change the way the service is delivered for Harrow clients, therefore there is no financial implication on the Harrow SNT service.

## **11. Equalities implications / Public Sector Equality Duty**

- 11.1 There are no proposed strategy changes to service delivery that would cause a disproportionately adverse effect to any of the protected characteristics, therefore an EQIA is not required.
- 11.2 In the event of any proposed changes to service delivery that may affect equality rights the required consents and approvals would be sought and an EQIA undertaken.

## **12. Council Priorities**

Please identify how the decision sought delivers these priorities.

### **1. Improving the environment and addressing climate change**

As set out in environmental implications section above

### **2. Addressing health and social care inequality**

The services provided support people with Special Needs and enable them to participate in meaningful and life fulfilling activities

## **Section 3 - Statutory Officer Clearance**

### **Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 20 May 2022**

### **Statutory Officer: Patricia Davila**

Signed by the Monitoring Officer

**Date: 18 May 2022**

### **Chief Officer: Dipti Patel**

Signed off by the Corporate Director

**Date: 31 May 2022**

### **Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 26 May 2022**

### **Head of Internal Audit: Susan Dixson**

Signed on by the Head of Internal Audit

**Date: 26 May 22**

## **Mandatory Checks**

**Ward Councillors notified: YES, as it impacts on all Wards**

**EqIA carried out: NO**

There are no proposed strategy changes to service delivery that would cause a disproportionate adverse effect to any of the protected characteristics therefore an EQIA is not required.

In the event of any proposed changes to service delivery that may affect equalities the required consents and approvals would be sought and an EQIA carried out by Officers.

**EqIA cleared by: N/A**

## **Section 4 - Contact Details and Background Papers**

**Contact:** Mohammed Hafeez, Acting Head - Transport & Environmental Operations 0208 424 1443 | 0208 424 1751  
[mohammed.hafeez@harrow.gov.uk](mailto:mohammed.hafeez@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee**

**NO**



**Report for: Cabinet**

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<b>Cabinet</b>	23 <sup>rd</sup> June 2022
<b>Subject:</b>	School Organisation Up-Date Provision for Special Educational Needs
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Peter Tolley - Interim Corporate Director, People Services
<b>Portfolio Holder:</b>	Councillor Hitesh Karia - Portfolio Holder, Children's Services
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Equalities Impact Assessment

## **Section 1 – Summary and Recommendations**

This report outlines the progress to date to increase special school provision from September 2022 and the creation of additional Additionally Resourced Mainstream school (ARMs) units in accordance with the Special Educational Needs and Disability (SEND) Strategy and the associated capital programme.

### **Recommendations:**

Cabinet is requested to:

1. Note the progress on additional SEND provision planned in Harrow
2. Delegate authority to Corporate Director People Services, following consultation with the Portfolio Holder Children Services, and consideration of consultation responses, to publish the statutory notices that will enable the increase of SEND provision in Harrow in accordance with the SEND Strategy.
3. Delegate authority to the Corporate Director People Services, following consultation with the Portfolio Holder Children Services to determine the notices that will enable the increase of SEND provision in Harrow in accordance with the SEND Strategy.
4. Approve the commencement of all procurements that are required to deliver the programme.
5. Delegate authority to the Corporate Director People Services, following consultation with the Director of Finance, Portfolio Holders for Finance & Human Resources and Children Services to award contracts following each procurement

### **Reason: (for recommendations)**

To enable the Local Authority to fulfil its statutory duties to provide sufficient school places in its area.

## **Section 2 – Report**

### **Introduction**

1. The Local Authority has a statutory responsibility to provide sufficient school places for its area. Like many boroughs, Harrow experienced significant growth in the pupil population and implemented strategies to manage the number of school places.
2. There has also been a significant growth in pupils with special education needs and requests for Education Health and Care Plans (EHCPs). Harrow's SEND Strategy 2019-2024 outlines the current context for SEND nationally and locally and guiding principles for four strategic priorities.



3. One of the key priorities is to increase local provision and reduce placements in schools outside of Harrow by implementing 2 main strands of development:
  - A 'Whole System Shift' model
  - Further expansion of the additional resourced mainstream school (ARMS) provision and specialist provision.
4. This report updates on the implementation of SEND strategy to increase provision in Harrow.

## **Options considered**

5. To deliver the SEND Strategy priority to increase local provision, statutory notices to make prescribed changes to school's capacity and a school capital programme to provide sufficient and appropriate accommodation are required. To achieve the outcomes required the following options were considered:

Option 1: Do Nothing – this would not a viable option because to increase local provision changes to school organisation a capital programme is required. Without increasing local provision there would be an increase in out-borough placements.

Option 2: Complete statutory processes to increase school capacity and implement a schools capital programme to provide suitable and sufficient accommodation.

## **Background**

6. The LA is working collaboratively with the four special schools in Harrow, two of which are designated Moderate Learning Difficulties (MLD), to explore and progress how best Severe Learning Difficulties (SLD) provision can be expanded across a 'Whole System Shift' model and subsequently how MLD provision can be expanded and developed within mainstream schools.
7. The engagement and commitment of the MLDs schools and mainstream schools to develop ARMS provision, to the 'Whole System Shift' model is critical to the LA's SEND Strategy and key priority to increase the number of SLD places. To further support the System Shift, it is necessary that the range of special educational need met in the two MLD schools widens, to include more pupils with complex needs. Since September 2020, both Alexandra and Shaftesbury Schools have admitted approximately 15 pupils with more complex needs who would previously not have been considered, including several pupils from Woodlands School. This creates additional capacity in the two schools designated as for pupils with SLD.
8. With the establishment of a 'Whole System Shift' model, pathway projections determine that approximately 48 secondary and 36 primary

ARMS places will need to be developed by 2026 to meet capacity of demand for MLD pupils who would have previously been offered an MLD special school place.

9. Analysis of data on primary categories of need and projection modelling has shown that there are now greater numbers of children and young people in Harrow with SEND who have increasing levels of complex need identified as SLD. Based on increasing actual pupil numbers with SLD provision, between 2016 and 2022, and the continued additional demand for special school places, officers have developed projections which indicate that 20-25 additional SLD places will be required year on year for the next five years. These projections will be reviewed and monitored annually. The table below shows the overall growth for pupils with an EHCP since 2016.

<b>Harrow SEN2 Return</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Number of EHCP/Statement</b>	1,336	1,477	1,610	1,645	1,799	1,896	1,974

Source: DfE 2022 SEN2 Statistical First Release - Based on figures in January of the year

10. These projections for SEN places are based the need for a special school place for children with severe/complex special education needs. Harrow’s special schools currently mainly provide places for children with a Moderate Learning Difficulty (Alexandra School and Shaftesbury High School) and Severe Learning Difficulty (Woodlands School and Kingsley High School). The number of EHCPs have continued to significantly increase, which is being addressed by Harrow’s SEND Strategy and the ‘Whole System Shift’ model, along with an increase in the demand for SLD places. These increases are occurring across the country, however places in Harrow’s Special Schools are in high demand due to the Outstanding judgement from Ofsted of all Harrow’s special schools.
11. The projections in this report are based on the demand for:
- Nursery & Reception places in our special schools and ARMS units (additionally resourced provisions in mainstream schools)
  - Harrow children currently in other authority special settings requesting a place in Harrow secondary special schools
  - Children who are initially accommodated on a short-term basis in a mainstream school or recent arrivals into the borough who are receiving tuition from the Pupil Referral Unit (The Helix Education Centre) who have been identified as suitable for a special school placement.
12. This combined demand has continued increasing over recent years, with special school capacity filling up rapidly, and resulting in the need for additional special school places, especially in secondary special schools.

13. Prior to 2020, the growth in SLD numbers has been largely accommodated in primary through two expansions at a primary SLD special school (Woodlands School) and the development of a primary SLD resourced provision in a mainstream school (Belmont School). These developments have managed demand in the primary sector but as pupils roll through this will create pressure in the secondary sector. To accommodate increased demand Harrow Council expanded Kingsley Special School, to its full capacity, from 96 to 102 places from September 2021, however for September 2022 and beyond additional places will be required.
14. This approach will reduce the pressure on the High Needs Block (HNB) of the Dedicated Schools Grant (DSG) created by expensive out of borough placements thus enabling spend to benefit the development of Harrow's school provision for Harrow pupils. In addition, this approach will secure diversity in the provision of schools and increase choice for parental preference.

### **Current situation**

15. Whilst there has been some progress in implementing the system shift model, as outlined in the SEND strategy, this has been delayed during the COVID pandemic, as schools had to focus on covid recovery and return of children and young people to education. As a result, there is a need to increase provision for SLD secondary places for September 2022. It is proposed that there is a temporary expansion of Kingsley High School by a maximum of 24 places pupils. This will allow Kingsley High School to have the capacity to admit the Year 7 pupils moving up from Woodlands school.
16. Kingsley High School is an Outstanding Special School and popular with families. It provides 102 places for pupils aged 11 to 19 years of age, Year 7 to Year 13.
17. Officers have been working with Kingsley High School to explore ways to meet this demand. Given the site constraints of Kingsley High School, it is not possible to provide more accommodation for increased pupil numbers and therefore an additional site is required. There are very few immediately available sites in Harrow and therefore a short-term temporary solution has been sought. This will enable officers to continue exploring options for a permanent increase in SLD Provision with the school. As a temporary solution it is proposed that the expansion will be located at Weald Rise Primary School.
18. Weald Rise Primary School was rebuilt in 2016/17 under the Priority Schools Building Programme and expanded to 4 forms of entry (FE) to accommodate the increasing projected demand for school places at the time. Due to a range of factors, e.g., welfare change, Brexit, falling birth rates and Covid the trajectory has changed. The overall impact of

this has been that even though the number of pupils in primary schools has increased, they did not rise to the levels that were projected. A decreased demand for school places in the primary phase has been experienced across London. As a result, the school is currently operating at a lower capacity and therefore has available space to accommodate a small number of Kingsley High School's pupils. The Weald Rise building with minor remodelling has sufficient capacity to establish a self-contained temporary satellite provision.

19. The accommodation will comprise three classrooms, access to a sensory space, staff room, office, separate staff and pupil's toilets and access to outdoor space. This will accommodate the additional 24 pupils from Kingsley. Kingsley pupils will travel to school using council provided special needs transport. The routes will need to be planned but it is expected to be a combination of mini-buses and taxis. The pupils who will be moving to Kingsley already have access to SEN transport, so it is not envisaged that there to be an increased demand on the transport budget by creating this provision.
20. Weald Rise Primary School has experience operating with another school on its site as Hujjat Primary School occupied a small area of the school for a term in 2020. Funding for the resource provision will accommodate the cost of any additional costs e.g. utilities and other costs to ensure none of the schools have any additional costs as result of this satellite provision.
21. Officers have met with the Governing Bodies at Weald Rise Primary School and Kingsley High School. Both schools have agreed in principle to work together with the Local Authority to open a temporary satellite provision. A task and finish group will be established to plan the provision and its operation at Weald Rise and ensure that the details are communicated with staff, families and pupils. This will be a time limited group and will transition into an operational group from September 2022. The group will be supported by senior officers from the Education Directorate.
22. Officers are working with the Governing Bodies to finalise the revenue requirements to ensure that the proposals are cost effective and do not create additional financial pressures for either school. Providing local provision will mean that the cost to the Council overall will be less than having to send pupils to special schools outside of the borough.
23. The details for the opening and operation of the expansion are being finalised. In the event of delays to the delivery of the required capital programme, interim arrangements will be made to ensure that pupils have access to suitable education from the beginning of September.
24. These proposals are subject to Statutory Notice processes including consultation with families and Harrow residents. Any decisions will be made after the consultation process. The statutory notices process is outlined in the next section.

## Statutory Proposals and Consultation

25. Statutory Notices were published on Monday 6<sup>th</sup> June in accordance with DfE Guidance for making significant changes ('prescribed alterations') to maintained schools. The Notices are published in the local paper and details sent to interested parties including parents with children at both schools to invite comments on the proposals. Sessions for parents and staff at both schools are also planned.
26. The Statutory Notices are published for four weeks and will close on Monday 4<sup>th</sup> July. Officers will then review the comments received and prepare a report for the Corporate Director to consider in consultation with the Portfolio Holder to determine the notices.

When issuing a decision, the decision-maker can:

- reject the proposal;
- approve the proposal without modification;
- approve the proposal with modifications, having consulted the LA and/or GB (as appropriate); or
- approve the proposal, with or without modification – subject to certain conditions (such as the granting of planning permission) being met.

Once the notices have been determined the outcome will be shared with the schools. The decision is based on the outcome of the consultation.

## Update on other SEND Projects

27. To increase provision in mainstream schools for pupils with moderate learning difficulties (MLD) there are a series of proposals and associated capital projects to create additional capacity during the academic year 2022/23. Discussions are in progress with the Governing Bodies and feasibility studies are beginning undertaken to create suitable and sufficient accommodation at the following schools:

- Pinner Wood Primary School
- Stanburn Primary School
- Grange Primary School
- Canons High School

Name	Need	Number of places
Grange Primary School	MLD	12
Grange Nursery	Complex needs	12 part-time places (6 FTE)
Stanburn Primary School	MLD	12
Pinner Wood Primary School	MLD	12
Canons High School	MLD	12

28. Once the feasibility studies have been completed, a capital programme provided and final costings agreed with the local authority and schools,

statutory notices will be published in accordance with DfE Statutory Guidance to make prescribed changes to schools.

29. Feasibility studies are also being developed to increase capacity at Shaftesbury High School to increase the provision for pupils with SLD and to replace accommodation at Woodlands Primary School to maintain the capacity.
30. During 2022/23 Phase 3 will need to be developed in accordance with the SEND Strategy.

### **Ward Councillors' comments**

31. No comments have been received from Ward Councillors.

### **Performance Issues**

32. Schools in Harrow perform well in comparison to national and statistically similar local authorities. The vast majority of primary schools and secondary schools are judged 'good' or 'outstanding' by OfSTED. As at 31<sup>st</sup> January 2022, 93% of Harrow's primary and secondary schools are judged 'good' (49%) or 'outstanding' (44%), in line with 93% in London (63% Good, 30% Outstanding) and above 87% nationally (68% Good, 19% Outstanding) (Source: Ofsted Data View).
33. The Education Act 2011 maintains a focus on driving up standards in schools, and places more of the responsibility with the schools directly for their improvement. The role of the Local Authority in measuring performance and driving improvement has changed significantly and is reduced from its previous level.
34. The Local Authority continues to monitor key education indicators. The indicators are used locally to monitor, improve and support education at both school and local authority level. They are also used within information provided to the Department for Education.

### **Environmental Implications**

35. Harrow Council passed a motion to declare a climate emergency on 18 July 2019, with the aim to make Harrow a carbon neutral organisation by 2030. This is a very challenging ambition and Harrow Schools are expected to adopt a more proactive approach to minimise their energy wastage and carbon footprint in line with the borough and central government's carbon reduction targets and objectives. The heating and power requirements of the borough's maintained schools are a significant part of the overall carbon footprint that is attributable to the Council's estate. Reducing emissions from schools is therefore a vital component in meeting the Council's target.

36. In expanding existing schools, consideration should be given to delivering building works in a way that minimises the greenhouse gas emissions associated with the project, including in the selection of materials. Of particular importance will be the use of low carbon technologies – particularly for space heating – and these will need to be thoroughly investigated during the design phase. Council run procurement processes will also be required to actively test prospective suppliers on their ability to deliver greenhouse gas emissions reductions, in accordance with the Council's Low Carbon Procurement Policy adopted by cabinet in March 2022.
37. For many of the projects in the school expansion programme, planning applications are required, and part of the application is a school travel plan. Through this process and the development of the solutions for the schools, the impact of the additional pupils and their travel modes will be addressed.

### Data Protection Implications

38. There are no data protection implications with this proposal.

### Risk Management Implications

39. Risks included on corporate or directorate risk register? Yes, this is included in the directorate risk register
40. Separate risk register in place? No, there will be a risk register for each capital project which will be developed when the programme is implemented.
41. The relevant risks contained in the register are attached/summarised below. Yes
42. The following key risks should be taken into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
The School Roll Projections are under or overstated leading to an under or over provision of SLD within the Borough	The Council has used the GLA roll projections and they have been reliable in the past	Green
Overspend of HNB by £27m by 2025 (There are number of reasons why this overspend is projected e.g. historic under funding, please see Financial	Creation of additional in-borough provision reduces the future pressures on the HNB. The average cost of an out of borough independent/non maintained specialist provision is in the region of £50k-£80k per	Red

<b>Risk Description</b>	<b>Mitigations</b>	<b>RAG Status</b>
Implications for further details)	academic year depending on the complexity of need.  There will also be costs avoided to the SEN Transport budget which is funded by the General Fund if a child can be prevented from being placed out of borough.	
Breach of s14 of the Education Act 1996 if insufficient school places on offer	The proposed expansion will ensure the that the Act is not breached.	Green
Delays in the delivery and completion of the capital programmes	The projects will be managed by a Project Manager responsible for monitoring the delivery of the scheme and liaising with the schools and officers. If there are delays alternative arrangements will need to be made to ensure pupils receive appropriate education during the period of delay.	Amber

## **Procurement Implications**

43. The procurement team will support the delivery of all procurement associated with this programme. Procurement will be undertaken consistent with the Public Contract Regulations 2015 and the Council's own Contract Procedure Rules. As outlined in October 2021 and September 2020 Cabinet Reports.

## **Legal Implications**

44. The Council has a statutory duty under the Education Act 1996 to ensure the provision of sufficient schools for the provision of primary and secondary education in their area.
45. Under s.14 of the Education Act 1996, a local authority shall secure that sufficient schools for providing primary and secondary education are available in their area. Sufficient means sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education.
46. In meeting this duty, a local authority must do so with a view to securing diversity in the provision of schools and increasing opportunities for parental choice.



47. The expansion of a maintained special school to increase the number of pupils by 10% or more than 20 pupils and a change in the type of special educational needs for which a maintained special school is organised to make provision is a prescribed alteration for which statutory proposals must be published and approved in accordance with section 19(1) of the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013.
48. In accordance with the regulations to open a satellite provision it needs to be demonstrated that a new school is not being opened. It is the view of officers that the background to the proposals as set out in this report demonstrates that the proposals are genuine expansion proposals and not proposals for a new school pupils and staff at Kingsley High School. Governance, leadership and management arrangements will be put in place to oversee the new site by the Head Teacher and Governing Body of Kingsley High School. Pupils and staff will have access to both sites as and when required, to ensure that the needs of the pupils at both sites of the sites of Kingsley High School are met. This is a temporary solution. It is also noted that Weald Rise Primary School already has some experience of operating with another school on its site. The temporary site will serve the same community as the existing school which provides for pupils across Harrow. Staff will transfer across the sites according to needs.

## Financial Implications

### Capital Funding

49. Capital works associated with the increased provision will be funded from the Special Provision Capital Fund grant provided by the DfE to ensure there are sufficient good school places for those with SEND. LAs can use the funding to improve and expand special provision for children with EHCPs. The total funding available is £5.433m and has so far been allocated as shown in the table below. These costings are prior to procurement of a contractor.
50. These schemes were agreed by the Council's Capital Programme by Cabinet in February 2021.

Scheme	Estimate Cost £'000	Balance £'000
		£5,433
Woodlands	£295	
Pinner Wood ARMs	£610	
Shaftesbury	£1,500	
Stanburn ARMs	£450	
Grange ARMs	£590	
Weald Rise Kingsley	£389	
Canons High School	tbc	
Total	£3,833	

Uncommitted		£1,600
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51. There will also be a further allocation of grant funding from the High Needs Provision Capital fund of £1.749m in 2022-23 and £4.147m in 2023-24 which is addition to the funding identified in the table above.

### Revenue Funding

52. The DSG is a ring-fenced grant of which the majority is used to fund individual school budgets in maintained schools, academies and free schools in Harrow. It also funds Early Years nursery free entitlement places for 2-, 3- and 4-year-olds in maintained council nursery classes and private, voluntary and independent (PVI) nurseries as well as provision for pupils with High Needs including those with Education Health & Care Plans (EHCPs) in special schools and special provision and mainstream schools in Harrow and out of borough. The DSG is split into blocks: schools block, early years block and high needs block.
53. At the end of March 2022 there is a cumulative deficit on the High Needs Block of £4.007m which has built up over the last three financial years.
54. Any deficits an authority may have on its DSG account is expected to be carried forward and does not require to be covered by the authority's general reserves. This is a temporary arrangement until 2022-23 beyond which LAs must demonstrate they have sufficient reserves to cover the deficits.
55. With effect from 2019-20 the DfE has tightened up the rules under which local authorities have to explain their plans for bringing the DSG account back into balance.
56. The DfE will require a report from any LA that has a cumulative DSG deficit of more than 1% at the end of the financial year. The 1% calculation will be based on the latest published DSG allocations for 2021-22 compared with the deficit shown in the authority's published draft accounts.
57. The final deficit at the end of 2021-22 of £4.007m represents 1.67% of the overall DSG allocation (including academy funding). The recovery plan has been drafted however and discussed with Schools Forum. However, the following points should be noted.
58. Despite the significant proposals and measures planned over the next ten years, this will not mitigate the deficit. This is due to the following contributory factors:
- historical underfunding
  - current budgets being based on historical budgets rather than historical spend
  - extension of age range to include 0-5 and post 19

- current and projected formulaic funding which does not keep pace with demand
  - significant historical and projected growth in number of EHCPs
  - continued growth in complexity of pupils' needs
  - limitations about creating cost effective provision in borough due to capacity and site limitations
59. Creation of additional in-borough provision reduces the future pressures on the HNB. The average cost of an out of borough independent/non maintained specialist provision is in the region of £50k-£80k per academic year depending on the complexity of need.
60. It is anticipated that a place at special school in Harrow would be cost £25k-£35k and a place at an ARMS provision would cost £20k-£25k per academic year.
61. There will also be costs avoided to the SEN Transport budget which is funded by the General Fund if a child can be prevented from being placed out of borough.

### **Equalities implications / Public Sector Equality Duty**

62. Section 149 of the Equality Act 2010 requires that public bodies, in exercising their functions, have due regard to the need to (1) eliminate discrimination, harassment, victimisation and other unlawful conduct under the Act, (2) advance equality of opportunity and (3) foster good relations between persons who share a protected characteristic and persons who do not share it.
63. Harrow's schools are successful, inclusive and provide a diversity of provision. The school expansion programme will ensure sufficient school places for the increasing numbers of children in Harrow and will build on the successful provision that already exists in Harrow's schools. By acting to ensure all children in Harrow have access to a high-quality school place, Harrow is promoting equality of opportunity for all children and young people.
64. Equalities impact assessment has been carried out and there are no negative impacts arising from these proposals.

### **Council Priorities**

65. The recommendation supports the Council Priority of Putting Residents First by consulting families on proposals to increase provision for pupils with special education needs in local schools.

## **Section 3 - Statutory Officer Clearance**

**Statutory Officer: Jo Frost**

Signed on behalf of the Chief Financial Officer

**Date: 10 June 2022**

**Statutory Officer: Helen Ottino**

Signed on behalf of the Monitoring Officer

**Date: 10 June 2022**

**Chief Officer: Peter Tolley**

Signed by the Interim Corporate Director

**Date: 10 June 2022**

**Head of Procurement: Lisa Taylor**

Signed on behalf of the Head of Procurement

**Date: 10 June 2022**

**Head of Internal Audit: Susan Dixon**

Signed by the Head of Internal Audit

**Date: 10 June 2022**

## **Mandatory Checks**

**Ward Councillors notified:** NO, as it impacts on all Wards

(Harrow Weald Ward Councillors have been informed because these proposals relate to two specific schools. However, pupils attending Harrow's Special Schools, including Kingsley High School, live in all parts of the Borough and travel to school)

**EqlA carried out: YES**

**EqlA cleared by: Shumaila Dar**

## **Section 4 - Contact Details and Background Papers**

**Contact:** Rajeshree Parmar, Head of School Organisation, Admissions and Attendance, People Services, email:

[raj.parmar@harrow.gov.uk](mailto:raj.parmar@harrow.gov.uk)

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee**

**NO**

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## Equality Impact Assessment (EqIA)



### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

## Equality Impact Assessment (EqIA)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	School Organisation Up-Date Provision for Special Educational Needs	<b>Date EqIA created 23/5/22</b>
<b>Name and job title of completing/lead Officer</b>	Rajeshree Parmar, Head of School Organisation, Admissions and Attendance	
<b>Directorate/ Service responsible</b>	People Services	
<b>Organisational approval</b>		
<b>EqIA approved by EDI Team</b>	<b>Name Shumaila Dar, Head of EDI</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval 09/06/22</b>

96



**1. Summary of proposal, impact on groups with protected characteristics and mitigating actions**  
(to be completed after you have completed sections 2 - 5)

**a) What is your proposal?**

To increase special school provision from September 2022 as an interim arrangement and the creation of permanent additional ARMs units in accordance with the SEND Strategy and the associated capital programme.

**b) Summarise the impact of your proposal on groups with protected characteristics**

The proposal should positively impact on groups with protected characteristics as we are creating additional SEND school places.

**c) Summarise any potential negative impact(s) identified and mitigating actions**

There are no potential negative impacts.

<b>2. Assessing impact</b>																																																																				
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact																																																																		
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact																																																															
			Minor	Major																																																																
Age	<p>SEND provision is required to meet the needs of all young people from 0-25. The demand on places for young people with SEND is increasing.</p> <table border="1"> <thead> <tr> <th colspan="7">Number of pupils in Harrow Primary Schools 2016-2022</th> </tr> <tr> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>22,017</td> <td>22,461</td> <td>22,542</td> <td>22,842</td> <td>22,851</td> <td>22,554</td> <td>22,460</td> </tr> </tbody> </table> <p>Source: Spring School Census Returns 2016-2022 Includes pupils who are sole or dual main registrations.</p> <table border="1"> <thead> <tr> <th colspan="7">Number of pupils in Harrow Secondary Schools 2016-2022</th> </tr> <tr> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>12,573</td> <td>12,885</td> <td>13,131</td> <td>13,835</td> <td>14,486</td> <td>15,058</td> <td>15,477</td> </tr> </tbody> </table> <p>Source: Spring School Census Returns 2016-2022 Includes pupils who are sole or dual main registrations.</p> <table border="1"> <thead> <tr> <th colspan="7">Number of pupils in Harrow Special Schools 2016-2022</th> </tr> <tr> <th>2016</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>421</td> <td>441</td> <td>447</td> <td>462</td> <td>464</td> <td>482</td> <td>492</td> </tr> </tbody> </table> <p>Source: Spring School Census Returns 2016-2022 Includes pupils who are sole or dual main registrations.</p>	Number of pupils in Harrow Primary Schools 2016-2022							2016	2017	2018	2019	2020	2021	2022	22,017	22,461	22,542	22,842	22,851	22,554	22,460	Number of pupils in Harrow Secondary Schools 2016-2022							2016	2017	2018	2019	2020	2021	2022	12,573	12,885	13,131	13,835	14,486	15,058	15,477	Number of pupils in Harrow Special Schools 2016-2022							2016	2017	2018	2019	2020	2021	2022	421	441	447	462	464	482	492	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The table below shows that the number of pupils attending the schools referred to in the Cabinet Report.

School Name	2016	2017	2018	2019	2020	2021	2022	Last 7 years Difference	
Grange Primary School	635	600	591	601	612	538	512	-123	-19.4%
Pinner Wood School	596	610	581	637	665	666	667	71	11.9%
Stanburn Primary School	774	798	812	797	783	753	755	-19	-2.5%
Weald Rise Primary School	694	675	558	464	434	373	375	-319	-46.0%
Canons High School	1085	1197	1221	1250	1262	1266	1276	191	17.6%
Kingsley High School	79	78	76	75	85	98	104	25	31.6%

Source: Spring School Census Returns 2016-2022  
Includes pupils who are sole or dual main registrations.

### Disability

We are creating additional SEND places in special schools and mainstream schools to allow residents the opportunity to send their child to a local provision. This is a positive step to allow young people to remain their community and reduce travel times for young people who need specialist provision.

SEND provision is required to meet the needs of all young people from 0-25. The demand on places for young people with SEND is increasing.



<b>Primary Schools (Current and Main-Dual Enrolment Status)</b>						
<b>EHCP/Statement</b>						
<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
325	331	371	409	436	488	533

Source: Spring School Census Returns 2016-2022

<b>Secondary Schools (Current and Main-Dual Enrolment Status, Yr7-Yr13)</b>						
<b>EHCP/Statement</b>						
<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
247	260	257	253	290	306	342

Source: Spring School Census Returns 2016-2022

<b>Special Schools (All Enrolment Status)</b>						
<b>EHCP/Statement</b>						
<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
418	439	446	457	464	479	491

Source: Spring School Census Returns 2016-2022

<b>EHCP/ Statement</b>								
<b>School Name</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Last 7 year Difference</b>
Grange Primary School	2	5	5	10	9	12	20	18
Pinner Wood School	5	5	5	4	6	9	11	6
Stanburn Primary School	8	7	6	8	12	12	19	11
Weald Rise Primary School	4	5	4	6	6	5	7	3

	Canons High School	19	23	21	22	21	22	19	0					
	Kingsley High School	79	78	76	71	85	96	103	24					
Source: Spring School Census Returns 2016-2022														
<b>Gender reassignment</b>	This data is not held, and this data is not applicable in the context of this proposal.										<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	Not applicable in the context of this proposal.										<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy and Maternity</b>	Not applicable in the context of this proposal.										<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Race/  
Ethnicity

The positive implications of the inclusive approach to young people from all races are not impacted by the proposed change. By creating additional local capacity will we secure diversity in the provision of schools and increase choice for parental preference. Young people will be able to access the additional provision based on an assessment of their need. Race and Ethnicity is not a criterion by which their needs are assessed. School places at special schools are assessed by educational and health needs.

Ethnic Origin	Canons High School	Grange Primary School	Kingsley High School	Pinner Wood School	Stanburn Primary School	Weald Rise Primary School
Any other ethnic group	136 (10.6%)	28 (5.5%)	3 (2.9%)	19 (2.8%)	58 (7.7%)	61 (16.3%)
Asian Other	219 (17.0%)	189 (36.9%)	30 (28.8%)	63 (9.4%)	120 (15.9%)	111 (29.6%)
Bangladeshi	8 (0.6%)	7 (1.4%)	1 (1.0%)	14 (2.1%)	10 (1.3%)	9 (2.4%)
Black African	149 (11.6%)	29 (5.7%)	9 (8.7%)	48 (7.2%)	15 (2.0%)	24 (6.4%)
Black Caribbean	31 (2.4%)	7 (1.4%)	1 (1.0%)	7 (1.0%)	12 (1.6%)	14 (3.7%)
Black Other	18 (1.4%)	11 (2.1%)	1 (1.0%)	4 (0.6%)	1 (0.1%)	1 (0.3%)
Chinese	4 (0.3%)	2 (0.4%)	1 (1.0%)	3 (0.4%)	5 (0.7%)	(0.0%)
Indian	136 (10.6%)	39 (7.6%)	17 (16.3%)	217 (32.5%)	271 (35.9%)	13 (3.5%)
Information not obtained	3 (0.2%)	(0.0%)	(0.0%)	(0.0%)	(0.0%)	(0.0%)
Mixed Other	44 (3.4%)	15 (2.9%)	3 (2.9%)	23 (3.4%)	43 (5.7%)	5 (1.3%)
Mixed White Asian	23 (1.8%)	7 (1.4%)	6 (5.8%)	14 (2.1%)	14 (1.9%)	3 0.8%
Mixed White Black African	13 (1.0%)	7 (1.4%)	(0.0%)	3 (0.4%)	3 (0.4%)	4 (1.1%)



	Mixed White Black Caribbean	7 (0.5%)	11 (2.1%)	(0.0%)	20 (3.0%)	3 (0.4%)	2 (0.5%)				
	Pakistani	50 (3.9%)	29 (5.7%)	4 (3.8%)	53 (7.9%)	52 (6.9%)	21 (5.6%)				
	Refused	2 (0.2%)	14 (2.7%)	2 (1.9%)	2 (0.3%)	11 (1.5%)	(0.0%)				
	White British	45 (3.5%)	19 (3.7%)	9 (8.7%)	113 (16.9%)	21 (2.8%)	27 (7.2%)				
	White Irish	1 (0.1%)	1 (0.2%)	(0.0%)	1 (0.1%)	1 (0.1%)	(0.0%)				
	White Irish Traveller	(0.0%)	3 (0.6%)	(0.0%)	(0.0%)	2 (0.3%)	1 (0.3%)				
	White Other	396 (30.7%)	94 (18.4%)	17 (16.3%)	63 (9.4%)	113 (15.0%)	79 (21.1%)				
	White Roma	4 (0.3%)	(0.0%)	(0.0%)	(0.0%)	(0.0%)	(0.0%)				
	<b>Grand Total</b>	<b>1289</b>	<b>512</b>	<b>104</b>	<b>667</b>	<b>755</b>	<b>375</b>				
	Source – Spring School Census 2022										
There is no group that will be disproportionately impacted by the proposed changes.											
<b>Religion or belief</b>	This proposal is inclusive of children from all religions and belief. Schools draw pupils from their local area and the pupil profiles reflects the ethnicity of their areas. The positive implications of the inclusive approach to children from all religions and belief are not impacted by the proposed change. School places at special schools are assessed by educational and health needs.							<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
This data is not held.											
<b>Gender</b>	The proposal for creating additional SEND school places is inclusive of young people of all genders. School places at special schools are assessed by educational and health needs.							<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Ethnic Origin	Canons High School	Grange Primary School	Kingsley High School	Pinner Wood School	Stanburn Primary School	Weald Rise Primary School
Female	562 (43.6%)	257 (50.2%)	28 (26.9%)	323 (48.4%)	364 (48.2%)	194 (51.7%)
Male	727 (56.4%)	255 (49.8%)	76 (73.1%)	344 (51.6%)	391 (51.8%)	181 (48.3%)
<b>Grand Total</b>	<b>1289</b>	<b>512</b>	<b>104</b>	<b>667</b>	<b>755</b>	<b>375</b>

Source – Spring School Census 2022

#### Sexual Orientation

This data is not held, and this data is not applicable in the context of this proposal.





**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes

No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes

No



If you clicked the Yes box, Include details in the space below

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

105

#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### Include details in the space below

The Local Authority needs to ensure it has fair criteria in relation to community school admission and believes that reducing the number of school places at Grange Primary School in Harrow will not negatively impact on the community and schools. It is considered the change will not disadvantage children because there are sufficient places in schools in Harrow as currently the school is not filling to capacity.

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

Outcome 2

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

Outcome 3

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

**Report for: Cabinet**

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<b>Date of Meeting:</b>	23 June 2022
<b>Subject:</b>	Discretionary COVID19 Additional Relief Fund (CARF) scheme for Business Rates for period 1/4/21 to 31/3/2022 only
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dawn Calvert - Director of Finance, Resources Directorate
<b>Portfolio Holder:</b>	Councillor David Ashton – Portfolio Holder for Finance & Human Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1 - CARF Policy Appendix 2 – EqIA Appendix 3 – Government Guidance

## **Section 1 – Summary and Recommendations**

To introduce the COVID19 Additional Relief Fund (CARF) for the financial year 2021/22.

The Government announced plans to provide an additional business rates support package, worth £1.5 billion, to support businesses in England affected by COVID-19 but not eligible for existing support linked to business rates. Harrow Council has received £3,172,759 in funding

This relief is specifically for traders who were not eligible to apply for business rates grants / specific reliefs in 2020/21 & 2021/22, and where the description of the premises sits within defined valuation office category (or SIC) codes.

The value of relief will be a minimum of 10% of the 2021/22 business rates bill, after other reliefs are applied. Depending on modelling yet to be carried, the minimum award may be increased (up to a maximum of 50%) once we understand the potential number of eligible businesses and the average annual business rates charge, which will allow us to award the maximum support possible and ensure the overall cost is contained within the grant funds allocated.

Government guidance has been issued and sets out the detailed criteria that local authorities should use to determine funding relief for eligible properties. Harrow now wishes to exercise its discretion and adopt the attached policy, which has been modelled on the guidance issued, so it can support businesses in its area.

### **Recommendations:**

Cabinet is requested to:

1. Agree to adopt, for the year 2021/22, the attached discretionary “CARF Relief scheme” for business rate payers who meet the proposed eligibility criteria.
2. To agree that the Director of Finance may exercise discretion under s47 of the Local Government Finance Act 1988, (as amended) (hereinafter “LGFA”) and in consultation with the Portfolio Holder for Finance & Performance, in order to operate the approved scheme and determine the percentage level of support once modelling is carried out.

### **Reason (for recommendations):**

To ensure Harrow Council’s eligible business ratepayers receive the maximum amount of centrally funded relief that can be claimed and to ensure the Council supports the local economy.

## **Section 2 – Report**

### **1.1 Introductory paragraph**

- 1.2 The Rating (Coronavirus) and Directors Disqualification (Dissolved Companies) Act 2021 received royal assent which provided the legislation for the introduction of Covid-19 Additional Relief Fund (CARF).
- 1.3 The Department for Levelling Up, Housing and Communities (DLUHC) issued guidance for the scheme on the 15<sup>th</sup> December 2021. Local authority allocations of funding have since been announced with Harrow having been allocated £3,172,759 in funding to operate this scheme.
- 1.4 As this is a temporary relief fund for 2021/22, the Government did not change legislation relating to Business Rates relief available to properties. Instead, the Government will, in line with the eligibility criteria, reimburse Local Authorities where relief is granted using discretionary powers under Section 47 of the Local Government Finance Act 1998.
- 1.5 Although the Government have set some national criteria, it recognises that economic need will vary across the country, so wants Local Authorities to exercise their local knowledge and discretion to design a discretionary scheme to operate in its area. Officers are now proposing the attached scheme set out in the policy document.
- 1.6 This policy contains the provisions for the Harrow CARF scheme for compliance with statutory provisions and Government guidance. Subject to these requirements, however, each application shall be considered on its own merits with reference to the CARF policy and Government Guidance.

## **2 Scope and eligibility**

- 2.1 The Government guidance gives the Council discretion over the relief scheme, and Harrow Council decisions regarding the scheme will be final.

To be eligible to apply for relief under this main scheme, a Business Ratepayer must meet the conditions as set out within the proposed policy attached to this report. In broad terms, they should be a ratepayer liable and occupying a hereditament for Business Rates in the Harrow Council area during the period 1st April 2021 to 31st March 2022 (for a period of one day or more) where the hereditaments are rated and exist in the rating list under the specific sector classifications as defined by the Valuation Office Agency.

Most businesses in Harrow will therefore meet the criteria but Harrow will not award relief if the following applies;

- a. not award relief to ratepayers who for the same period of the relief either are or would have been eligible for the Extended Retail Discount (covering Retail, Hospitality and Leisure), the Nursery Discount or the Airport and Ground Operations Support Scheme (AGOSS),
- b. not award relief to a hereditament for a period when it is unoccupied (other than hereditaments which have become closed temporarily due to the government's advice on COVID-19, which should be treated as occupied for the purposes of this relief), and
- c. not award relief to a hereditament where the business paid no business rates due to the fact that it received 100% Small Business Rate Relief.
- d. local authorities must direct their support towards ratepayers who have been adversely affected by the pandemic and have been unable to adequately adapt to that impact.

As a very large number of businesses in Harrow have already received the above reliefs or pay no business rates due to receiving 100% reliefs, it is anticipated that around 1400 businesses may be eligible with approximately 400 potentially meeting point (d) above.

Once the scheme is approved, officers intend to open an application process on-line. It is planned to issue communications via social media, Harrow's website and the Business community contacts to ensure wide awareness of the scheme.

## 2.2 Cost of Scheme

The government will reimburse Harrow Council for any relief awarded via this initiative. Awards will be fully compensated via s31 grant and there will be no cost to the Council.

## 2.3 **Recommendation**

For the reasons articulated above in this report, it is recommended that Cabinet approves the exercising of discretion under s47, and approves the CARF scheme proposed, allowing the appropriate relief to be awarded for eligible commercial premises. This will reduce the rates liability for specific traders and will ensure support is granted to the local economy.

The proposed scheme will operate for the financial year 2021/22. Therefore awards will be made retrospectively in respect of the period 1/4/21 to 31/03/2022 only.

## 2.4 **Legal Implications**

The Council, as a billing authority, is empowered to award discretionary rate relief under s47 of The Local Government Finance Act 1988, as amended by s69 of the Localism Act 2011. The latter widened the scope of s47 to enable billing authorities to award discretionary relief to any

ratepayer. Harrow Council will deliver the scheme through the use of its existing discretionary relief powers.

The proposed scheme will utilise this flexibility to grant CARF relief and for determining the amounts given for the stated specific year, so Harrow Council can support local ratepayers who meet the Council's eligibility criteria.

Whilst the Council has the power to award discretionary rate relief to businesses as it thinks fit, the Council can only exercise its discretion if it is reasonable to do so having regard to the interests of local council tax payers and having elected to do so via a specific scheme or policy.

Cabinet must also note that in making discretionary payments, the local authority will be expected to ensure it is compliant with its obligations under the Permitted Subsidy Allowances (formerly known as State Aid).

As the scheme is solely for the financial year commencing 1<sup>st</sup> April 2021 and ending 31<sup>st</sup> March 2022, applications for the relief must be determined by 30<sup>th</sup> September 2022 in order to be eligible for backdating to 1<sup>st</sup> April 2021.

## **2.5 Financial Implications**

Regarding the cost of the scheme itself, there are no financial implications as the full cost of the awards will be paid back to the local authority via s31 grant.

## **2.6 Performance Issues**

Ensuring all eligible traders are awarded the reliefs they are entitled to will support collection rates and reduce collection administration.

## **2.7 Environmental Impact**

There are no direct environmental impacts anticipated from the recommendations contained within this report.

## **2.8 Risk Management Implications**

Risks included on corporate or directorate risk register? **No**  
Separate risk register in place? **No** but part of overall budget risks  
The relevant risks contained in the register are attached/summarised below. **n/a**

Whilst Officers have estimated the financial costs and numbers eligible as accurately as possible within the data available, the following key risks should be taken into account when agreeing the recommendations in this report:

Risk Identified	Mitigations	Rag Status
Awards are not paid within required deadline (30/09/22)	Mitigations are that we will mailshot all qualifying businesses and do some local advertising so businesses are aware of the scheme. Procedures will ensure payments are made in a timely manner and before the Sept deadline.	
Insufficient awareness of the scheme results in low take up	Mitigated by awareness campaign and targeting of potential eligible traders by mailshot being carried out.	
Harrow does not get recompensed for awards granted	Mitigated by policy following issued guidance and appropriate governance being put in place to ensure recipient traders meet eligibility criteria	
Harrow cannot afford scheme / Harrow awards exceeds grant allocated	As this is a Central Government initiative and Government is compensating LA's via s31 grant for any loss in rates retention monies as a direct result of awards of this relief, there is no or minimal risk to Harrow. However should the awards exceed the grant then Harrow would be responsible for the excess. As such modelling is being carried out to set the percentage award at a level that maximises awards to local businesses whilst expenditure will not exceed the grant allocated.	
Ineligible business rate payers apply and are paid the grant fraudulently or in error	Mitigated by the application process having built in checks to ensure ineligible businesses do not get paid.	
Policy does not comply with government guidance	Mitigated by policy following Government guidance and subsequently issued FAQ's which provide operating framework.	
Modelling is not robust leading to inappropriate level of support being provided	There is a small risk that too little or too much support may be provided as modelling can never be 100% accurate. Internal modelling will be reviewed and checks and balances added to ensure robustness.	
Obligations attached to Permitted Subsidy Allowances are not met	This relies solely on self declaration by Businesses as only they know what other permitted subsidies / allowances they have claimed in the year. There is therefore a real risk of fraud and businesses claiming what they should not but this cannot be further mitigated against.	

## 2.9 Equalities implications

A predictive Equalities Impact Assessment has been undertaken in relation to the policy and is attached.

When making this decision, Cabinet should have due regard to the Public Sector Equality Duty. Section 149 of the Equalities Act 2010 created the Public Sector Equality Duty. Section 149 states:-

- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (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.

2.10 The EqIA (Appendix 2) shows that potential recipients of relief would be around 1400 traders, spread across the borough. Occupiers of properties who have already received certain discounts for the same period will not benefit from the proposed scheme, and neither will traders who have already received business support grants from the local authority. This may mean that the proposal has an adverse impact on these traders.

Overall there were no adverse impacts found on protected groups should Harrow implement this policy; rather all impacts are potentially positive and would benefit qualifying traders in the current economic climate due to the potential reduction it would have on the amount of Business Rates qualifying ratepayers would have to pay.

### **Corporate Priorities**

This report supports the local economy by adopting Government guidance and allowing Harrow to exercise s47 discretion to deliver targeted financial support to eligible local traders.

### **Environmental Implications**

There are no direct environmental impacts anticipated from the recommendations contained within this report.

### **Data Protection Implications**

There are no direct data protection impacts anticipated from the recommendations contained within this report.

### **Procurement Implications**

There are no procurement impacts anticipated from the recommendations contained within this report.

## **Section 3 - Statutory Officer Clearance**

### **Statutory Officer: Dawn Calvert**

Signed off by the Chief Financial Officer

**Date: 13 June 2022**

### **Statutory Officer: Baljeet Virdee**

Signed on behalf of the Monitoring Officer

**Date: 13 June 2022**

### **Chief Officer: Charlie Stewart**

Signed off by the Corporate Director

**Date: 13 June 2022**

**Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 13 June 2022**

**Head of Internal Audit: Susan Dixon**

Signed by the Head of Internal Audit

**Date: 6 June 2022**

## **Mandatory Checks**

*Ward Councillors notified: NO, as it impacts on all Wards*

*EqlA carried out: Yes*

*EqlA cleared by: xx*

## **Section 4 - Contact Details and Background Papers**

**Contact:** Fern Silverio (Head of Service – Collections & Housing Benefits), Tel: 020-8736-6818 / email: [fern.silverio@harrow.gov.uk](mailto:fern.silverio@harrow.gov.uk)

### **Background Papers:**

- [COVID-19 Additional Relief Fund \(CARF\) Local Authority Guidance](#)

## **Call-in waived by the Chair of Overview and Scrutiny Committee**

**NO**

**Harrow Council**  
**Draft Covid 19 Additional Relief Fund (CARF) Policy**  
**For the Financial Year Commencing 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022**

**Introduction**

- 1.1 On 25 March 2021, the Government announced plans to provide an additional business rates support package, worth £1.5 billion, to support businesses in England affected by COVID-19 but not eligible for existing support linked to business rates. Harrow Council has received £3,172,759 in funding.
- 1.2 The Rating (Coronavirus) and Directors Disqualification (Dissolved Companies) Act 2021 received royal assent which provided the legislation for the introduction of Covid-19 Additional Relief Fund (CARF). The Department for Levelling Up, Housing and Communities (DLUHC) issued guidance for the scheme on the 15<sup>th</sup> December 2021.
- 1.3 As this is a temporary relief fund for 2021/22, the Government is not changing legislation relating to Business Rates relief available to properties. Instead, the Government will, in line with the eligibility criteria, reimburse Local Authorities where relief is granted using discretionary powers under Section 47 of the Local Government Finance Act 1998.
- 1.4 Although the Government have set some national criteria, it recognises that economic need will vary across the country, so wants Local Authorities to exercise their local knowledge and discretion to design a discretionary scheme to operate in its area
- 1.5 Harrow Council has approved the scheme as set out in this policy document.
- 1.6 This policy contains the provisions for the Harrow CARF scheme for compliance with statutory provisions and Government guidance. Subject to these requirements, however, each application shall be considered on its own merits with reference to the CARF policy.

**2. Scope and eligibility**

- 2.1 The Government guidance gives the Council discretion over the relief scheme and Harrow Council decisions regarding the scheme will be final.
- 2.2 To be eligible to apply for relief under this main scheme, a Business Ratepayer must be a ratepayer liable and occupying a hereditament for Business Rates in the Harrow Council area during the period 1st April 2021 to 31st March 2022 (for a period of one day or more) where the hereditaments are rated in the qualifying sector classifications (SIC Codes) as set out in the Valuation Office Agency Local Rating List.
- 2.3 The scheme is open to most business ratepayers. Hereditaments anticipated to be eligible under the scheme will principally be;
  - a. Offices
  - b. Non-retail warehouses
  - c. Other non-retail Industrial premises
  - d. Other premises not listed in section 3 below.

2.4 The Business Ratepayer must also be able to demonstrate that they have been adversely affected by the pandemic and have been unable to adequately adapt to that impact.

### **3. Exclusions**

3.1 The following categories are excluded under the CARF scheme:

- a. Businesses who for the same period of the relief are or would have been eligible for the Extended Retail Discount (covering Retail, Hospitality and Leisure), the Nursery Discount or the Airport and Ground Operations Support Scheme (AGOSS);
- b. Businesses for periods when their hereditament is unoccupied (other than hereditaments which have become unoccupied temporarily due to the government's advice on COVID-19);
- c. In line with the legal restrictions in section 47(8)(A) of the Local Government Finance Act 1988, billing authorities may not grant the discount to themselves, to a precepting authority, or to a functional body within the meaning of the Greater London Authority Act 1999;
- d. Business Ratepayers that do not occupy a hereditament within the Harrow Council boundary;
- e. Business Ratepayers that are not compliant with Government subsidy limits as defined within Section 7 of this policy;
- f. Business Ratepayers that occupy hereditaments that are not listed in the Local Rating List;
- g. Business Ratepayers receiving 100% Small Business Rates Relief or 80% Mandatory Rate Relief with 20% "top-up", funded through the Business Rates Retention Scheme.
- h. Also excluded under the terms of this policy are hereditaments described in the rating list as car parking spaces, telecommunication masts, advertising rights, show homes and land under development.
- i. Businesses in liquidation, dissolved, struck off or subject to a striking off notice at the date of award shall not be eligible under this policy.

### **4. Evidence Required**

4.1 To be considered for this relief, businesses shall be required to provide a statement and any supporting evidence demonstrating how it has been adversely affected by the pandemic and been unable to adapt adequately to the impact.

4.2 If satisfactory evidence is not provided, the application may not be further considered.

### **5. Application Process**

- 5.1 Consideration for the scheme will be via application form only. An application must be received for each hereditament.
- 5.2 Business Rates must continue to be paid as previously notified, until a revised bill is issued for any relief given under the CARF scheme.
- 5.3 Applications shall be accepted from Business Ratepayers or their nominated representative only.

## **6. Amount of Relief**

- 6.1 The amount of relief awarded will be a minimum of 10% of the 2021/22 business rates charge or part charge (if the claimant became liable for business rates part year) after all other eligible reliefs have been considered / applied in the manner set out in Section 6.2 of this policy. This percentage award may be increased for all successful eligible applicants subject to the number and value of applications received and awarded. However, the maximum award will not exceed 50% of the net liability as previously described and set out in section 6.2 below. The award will be a one off award but may be adjusted for changes in circumstances.
- 6.2 Any award of relief in accordance with this policy shall be applied after mandatory rate reliefs and other discretionary rate reliefs funded by section 31 grants have been applied, excluding those where Harrow Council has provided relief using its wider discretionary relief powers introduced by the Localism Act 2011 which are not funded by section 31 grants.
- 6.3 All awards of relief will be by a credit against the Business Rates bill. No cash or BACS payments for any amount awarded shall be made. If a business has paid its Business Rates and subsequently has a credit on its account due to the awarding of relief under this policy, the credit will in the first instance be allocated to the 2022/23 Business Rates or any arrears liability. If there are no arrears it may be refunded if an application for that purpose is received.

## **7. Subsidy control**

- 7.1 There is a requirement for all relief given under this policy to be compliant with Subsidy Allowance guidelines. Government guidance concerning how this applies to the CARF scheme can be accessed at [Complying with the UK's international obligations on subsidy control: guidance for public authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/complying-with-the-uk-s-international-obligations-on-subsidy-control)
- 7.2 The terms of this policy shall comply with Government guidance for Subsidy Control, as set out within Section 7.1 above.

## **8. Duration of awards**

- 8.1 Entitlement to relief under this policy shall be for a fixed period starting on 1st April 2021 and ending on 31<sup>st</sup> March 2022 subject to compliance with the qualifying criteria set out in this policy and determination of the decision being made by 30<sup>th</sup> September 2022.
- 8.2 Therefore, for clarity, any determinations under this policy will apply only to the period 1/4/2021 to 31/3/2022 and will not continue for further financial years.

- 8.3 Where a Business Ratepayer ceases to be eligible under the terms of this CARF policy, any relief given shall cease with effect from the date that the qualifying conditions cease to be met.

## **9. Managing the risk of Fraud**

- 9.1 Neither the Council, nor the Government shall accept deliberate manipulation of the scheme of fraud. Any business applicant falsifying information to gain relief, will face prosecution and any funding will be recovered from them.
- 9.2 All information regarding the application of this policy shall be subject to internal and external audit checks as well as Government checks.
- 9.3 It shall be a duty of the Business Rate payer or their representative (nominated) applying for the CARF scheme to declare eligibility to the scheme and to report any change of circumstances that may affect their entitlement to the relief.

## **10. Data Protection and use of data**

- 10.1 All information and data provided by application shall be dealt with in accordance with the Council's Data Protection policy and Privacy Notices which are available to view on the Harrow Council website at [www.harrow.gov.uk/privacy](http://www.harrow.gov.uk/privacy)

## **11. Right of appeal**

- 11.1 There is no statutory right of appeal against a decision made by the Council in respect of discretionary retail discount. However, the Council will review the decision if a Business Ratepayer is dissatisfied with the outcome and a request is received in writing (including email) within 28 days of notification of the decision. Consideration may be given to an extension of that timescale where reasonable and extenuating circumstances apply, subject at all times to the 30th September 2022 "cut-off" date referred to in this policy. This review will be carried out by the Head of Service (Collection and Benefits) and the Portfolio Holder for Finance.
- 11.2 If an unsuccessful applicant requests a review, they shall still be required to continue to pay their rates bill as previously notified. Once the review has been conducted, the ratepayer will be informed in writing whether the original decision has been revised or upheld. Notification of the decision will be made within 28 days, or as soon as reasonably practicable.
- 11.3 The right of appeal process does not affect a ratepayer's legal right to challenge the decision by way of judicial review.

**June 2022**



### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqlA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Adoption of a discretionary COVID Additional Relief Scheme (CARF)	<b>Date EqlA created 10.5.2022</b>
<b>Name and job title of completing/lead Officer</b>	Neil Gann – Service Manager - Revenues	
<b>Directorate/ Service responsible</b>	Collections & Benefits	
Organisational approval		
<b>EqlA approved by Directorate Equalities Champion</b>	<b>Name</b>	<b>Signature</b>
		<input type="checkbox"/> Tick this box to indicate that you have approved this EqlA  Date of approval

120



**1. Summary of proposal, impact on groups with protected characteristics and mitigating actions**  
(to be completed after you have completed sections 2 - 5)

On 25<sup>th</sup> March 2021 the Government announced plans to provide an additional business rates support package to support businesses in England affected by COVID-19 but not eligible for existing support linked to Business Rates. The Department for Levelling Up, Housing and Communities (DLUHC) issued guidance for the scheme on 15<sup>th</sup> December 2021 following Royal Assent of the Rating (Coronavirus) and Directors Disqualification (Dissolved Companies) Act 2021.

It is a temporary relief fund for 2021/22 only and rather than amend legislation Government reimburse Local Authorities where relief is granted under Section 47 of the Local Government Act 1998. DLUHC has set some national criteria but in recognition of the varying economic needs across the country wants Local Authorities to exercise their local knowledge and design a discretionary scheme to operate in its area.

The national set criteria is specified as:-

- a) Not to award relief to ratepayers who for the same period of the relief either are or would have been eligible for the Extended Retail Discount (covering Retail, Hospitality and Leisure) the Nursery Discount or the Airport and Ground Operations Support Scheme (AGOSS),
- b) Not award relief to a hereditament (property in the rating list) for a period when it is unoccupied (except where it was temporarily closed due to Government’s advice on COVID-19 and
- c) Direct the support towards ratepayers who have been adversely affected by the pandemic and have been unable to adequately adapt to that impact.

In addition to the above in line with the legal restrictions in Section 47(8A) of the Local Government Finance Act 1988, billing authorities may not grant the discount to themselves, certain precepting authorities or a functional body. For Harrow this means excluding any rate accounts in the names of our precepting authority of the Greater London Authority, Police, Fire and Civil Defence.

Harrow Council is an outer London Borough with 5,533 Business Rate properties. The attached analysis shows the breakdown of the types of business premises in the borough.

To qualify for this discretionary relief the business ratepayer must have been liable and in occupation of a business rate property during the

period 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022 (for a period of one day or more).

Additional criteria that are proposed for the Harrow Council scheme including both national and local requirements are as follows:

- Businesses not compliant with the Government Subsidy limits as defined in the policy
- Businesses who do not occupy a property listed on the Harrow Council Local Rating List
- Businesses who are in receipt of 100% Small Business Rate Relief or 80% Mandatory Rate Relief with 20% 'Top-up'
- Businesses in occupation of a hereditament where it is rated in a certain sector as defined by the Valuation Office Agency Local Rating List and **set out in Appendix XX** of the policy including car parking spaces, telecommunication masts, advertising rights, show homes and land under development
- Businesses in liquidation, dissolved, struck off or subject to a striking off notice as at the date of the award will not be eligible .

Harrow Council will be able to determine whether entitlement is to be determined by an application process or by reference to Business Rates data already held. There has been no evidence to suggest that this approach will have a negative impact on claimants who have a protected characteristic. The precise arrangements for any application / award process will be promoted via our dedicated Business Rate webpage **and xxxx**

**b) Summarise the impact of your proposal on groups with protected characteristics**

This discretionary policy is for Business Rate payers only. Rates liability may also fall on an individual or corporate liability and by the nature of the charge is for businesses only. As this policy excludes unoccupied properties, it will only apply for those businesses that were trading and liable for a Business Rate charge during the period 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022.

Of the properties on the local rating list as at the 31<sup>st</sup> March 2022 there were

- 1378 in receipt of the Expanded Retail Discount
- 42 in receipt of Nursery Discount
- 26 in receipt of 80% Mandatory and 20% Top Up Relief

- 2196 in receipt of Small Business Relief (albeit not all would have been in receipt of 100% SBR – approximately 170 would pay the SBR multiplier i.e get no relief and 282 are in receipt of less than 100% SBR so may be eligible)

- 629 empty properties

This means that excluding the above from the 5,533 business hereditaments approximately 1700 ratepayers may be eligible for this discretionary relief. However there may be multiple applications during the year where the ratepayer changed during the year as entitlement is based on occupation for 1 day or more during the qualifying period.

Due to the restriction on Subsidy rules in the national set guidance many national organisations have already exceeded the set limits and so will not be eligible for this relief.

Small Businesses (0-4 people) represent 87% of the total number of Harrow’s businesses according to the Local Economic Assessment 2019-2020 of which the highest concentration is Professional, Scientific and Technical followed by the Information and Communciation Sector. However many of these may not actually have a business rate liability and so may not be eligible for this relief. They will however have had access to various statutory grant schemes available during 2020/21 and 2021/22 and via the Additonal Restrictions Grant run by the Economic Development Team. Others may have zero Business Rate liability due to entitlement to 100% Small Business Relief.

The IT system used does not hold equalities data and so it is not possible to run any analysis reports to determine whether the ratepayer concerned is in a protected characteristic group. Rates liability may also fall on an corporate liability where protected characteristics may not apply.

**c) Summarise any potential negative impact(s) identified and mitigating actions**

The timing of any application window will be considered outside of known religious key dates.

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <u>borough profile data</u> , <u>equalities data</u> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what a/ction (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
<b>Age</b>	<p>Business rates are not calculated based on age and records held do not show this information. The charge is worked out on a rateable value for each hereditament assessed by the Valuation Office Agency and multiplied by the Multiplier which is set by Government each year.</p> <p>Entitlement to any reliefs are not based on age and open to all within the qualifying criteria including this discretionary relief.</p> <p>In many instances the ratepayer will be a corporate identity or an individual trading as a business which may also be incorporated.</p> <p>It is however unlikely that this policy will lead to differential impact for people based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Disability</b>	<p>Business Rates are not calculated based on disability and records held do not show this information. See above comments.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p><b>Gender reassignment</b></p>	<p>Business Rates are not calculated based on gender reassignment and the records do not show this information. See above comments.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Marriage and Civil Partnership</b></p>	<p>Business Rates are not calculated based on marriage or civil partnership status. Information is held on titles where the ratepayer is an individual, but this is not used to either calculate the charge or to determine entitlement to this relief and is not a reliable indicator, as more than one person may be jointly liable for Business Rates, although only one name may appear on the account liability details.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Pregnancy and Maternity</b></p>	<p>Business Rates are not calculated based on pregnancy or maternity status. Information is held on titles where the ratepayer is an individual but this is not used to either calculate the charge or to determine entitlement to this relief and is not a reliable indicator, as more than one person may be jointly liable for Business Rates, although only one name may appear on the account liability details. for entitlement to this relief.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p><b>Race/ Ethnicity</b></p>	<p>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are BAME- owned. In the majority of these cases where it is a single business, they will be entitled to 100% small business relief which will mean the debt will be zero and so they will not be affected by this policy. <b>Check with ED</b></p> <p>The Business Rates IT system does not hold ethnicity or race data which is not applicable to the calculation of the charge or entitlement to any reliefs.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Religion or belief</b></p>	<p>The Business Rates IT system does not hold religion or belief data which is not applicable for the calculation of the charge or entitlement to any reliefs.</p> <p>It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.</p> <p>However, as any award must be made within a limited time window, any application process that may be required will be considered and timed as far as reasonably practicable for ratepayers to make the application outside of any key religious dates during the proposed period and any reasonable adjustments considered accordingly.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Sex</b></p>	<p>Information is held on titles where the ratepayer is an individual, but this is not used to either calculate the charge or to determine entitlement to this relief and is not a reliable indicator, as more than one person may be jointly liable for Business Rates, although only one name may appear on the account liability details. It is however considered</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.				
<b>Sexual Orientation</b>	The Business Rates IT system does not hold sexual orientation data which is not used for the calculation of the charge or entitlement to any reliefs.  It is however considered unlikely that this policy will lead to an adverse differential impact based on this protected characteristic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No   

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No   

If you clicked the Yes box, Include details in the space below

**3. Actions to mitigate/remove negative impact**

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

128

#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups



The policy is to deliver a Central Government initiative to support businesses in England affected by COVID-19 but not eligible for prescribed existing support linked to Business Rates. Neither the set national criteria nor the proposed local variations are considered likely to result in direct or indirect discrimination, harassment nor victimisation.

The scheme will help to deliver additional support to those businesses who, for whatever reason, were not entitled to the various relief schemes linked to Business Rates and in doing so will advance the equality of opportunity for those business ratepayers by providing a reduction to their business rate bills to recognise the impact of COVID -19 on their businesss where they have not been able to adapt.

The scheme will help foster good relations between communities through this additional support where the ratepayer could not previously access the reliefs linked to Business Rates where their trade was impacted in 2021-22 by COVID-19

DLUHC has given guidance to develop a local discretionary scheme to recognise the variances between local authorities which will support those who share relevant protected characteristics within Harrow Council boundaries.

**5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies**

**Outcome 1**

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here



Department for Levelling Up,  
Housing & Communities

# COVID-19 Additional Relief Fund (CARF): Local Authority Guidance



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December 2021

## Contents

About this guidance.....	4
Introduction .....	4
The COVID-19 Additional Relief Fund (CARF) .....	5
How will the relief be provided? .....	5
Which properties will benefit from relief? .....	6
How much relief will be available? .....	6
Recalculation of relief .....	7
Subsidy Control .....	7
Sample paragraph to include in CARF applications. ....	9
New Burdens .....	10
Annexes A-F: CARF Allocation methodology, categories and definitions.....	11
Annex A: COVID-19 Additional Relief Fund Allocation methodology.....	11
Annex B: Split of the Transport and Storage SIC1 Category.....	14
Annex C: Mapping of SIC to Special Category Code.....	15
Annex D: Definition of Retail, Hospitality and Leisure properties.....	29
Annex E: Definition of airports .....	33
Annex F: Definition of network supplying utilities and associated properties .....	34

# About this guidance

1. This guidance is intended to support local authorities in administering the COVID-19 Additional Relief Fund (CARF). This guidance applies to England only.
2. This guidance sets out the scope of CARF and the criteria which local authorities should have regard to when determining awards from the fund. The guidance does not replace existing legislation.
3. Enquiries on this measure should be addressed to: [ndr@communities.gov.uk](mailto:ndr@communities.gov.uk)

## Introduction

4. COVID-19 has presented a significant and unprecedented challenge for businesses. Since the start of the pandemic the Government's response to support businesses has been of a similarly unprecedented scale. The Government has provided over £400 billion of direct support to the economy during this financial year and last, which has helped to safeguard jobs, businesses and public services in every region and nation of the UK through the pandemic. The Government's support has included making £16 billion available to provide business rates relief for retail, hospitality and leisure properties, given the direct impact of COVID-19 and the Government's interventions on businesses in these sectors.
5. On 25 March the Government announced a new COVID-19 Additional Relief Fund (CARF) of £1.5 billion. The fund will be available to support those businesses affected by the pandemic but that are ineligible for existing support linked to business rates.
6. The £1.5 billion will be allocated to local authorities based upon the estimated rateable value in each local authority rating list which falls within the scope of the fund, weighted for the Gross Value Added (GVA) impacts of COVID-19 per sector. An explanation of the allocation methodology, categories and definitions is at Annex A to F. Individual local authority allocations are published alongside this guidance.
7. This document provides guidance to authorities about the operation and delivery of the policy.

# The COVID-19 Additional Relief Fund (CARF)

## How will the relief be provided?

8. The Government is not changing the legislation relating to the business rates reliefs available to properties. Instead, the Government will, in line with the eligibility criteria set out in this guidance, reimburse local authorities where relief is granted using discretionary relief powers under section 47 of the Local Government Finance Act 1988. It will be for individual billing authorities to adopt a local scheme and determine in each individual case whether, having regard to this guidance and their own local scheme, to grant relief under section 47. The relief is available to reduce chargeable amounts in respect of 2021/22.
9. Central government will fully reimburse local authorities for discretionary relief awards which comply with this guidance up to the maximum level of the allocations. Because billing authorities have completed their NNDR1s for 2021/22 already, payments to major precepting authorities will be unaffected by the award of the relief. Therefore, within the year billing authorities only will be provided with “on account” section 31 payments covering the full amount of relief awarded to ensure that their cashflow is not affected.
10. After the end of the year, billing authorities will also be asked to provide outturn data on the actual total cost of providing the relief via the NNDR3 forms for 2021/22. The loss of income resulting from the relief for each billing authority and major precepting authority will be reconciled against the on-account payments made over the course of the year and any difference will be paid or recovered.
11. The Department for Levelling Up, Housing and Communities will undertake a regular DELTA collection exercise. This will be used to monitor implementation progress. Authorities should therefore ensure they put in place arrangements to support this data collection process. Billing authorities should ensure that they are able to monitor and report the take-up of the scheme at Parliamentary constituency level and local authority level, and by the Special Category code of the hereditaments.

## Which properties will benefit from relief?

12. Billing authorities will be responsible for designing the discretionary relief schemes that are to operate in their areas. However, in developing and implementing their schemes local authorities must, if they are funding the relief from the section 31 grant:
  - a. not award relief to ratepayers who for the same period of the relief either are or would have been eligible for the Extended Retail Discount (covering Retail, Hospitality and Leisure), the Nursery Discount or the Airport and Ground Operations Support Scheme (AGOSS),
  - b. not award relief to a hereditament for a period when it is unoccupied (other than hereditaments which have become closed temporarily due to the government's advice on COVID-19, which should be treated as occupied for the purposes of this relief), and
  - c. direct their support towards ratepayers who have been adversely affected by the pandemic and have been unable to adequately adapt to that impact.
  
13. In line with the legal restrictions in section 47(8A) of the Local Government Finance Act 1988, billing authorities may not grant the discount to themselves, certain precepting authorities (e.g. a parish or county council) or a functional body, within the meaning of the Greater London Authority Act 1999.

## How much relief will be available?

14. It will be for local authorities to determine the level of relief for individual hereditaments.
  
15. The relief should be applied after mandatory reliefs and other discretionary reliefs funded by section 31 grants have been applied, excluding those where billing authorities have provided relief using their wider discretionary relief powers introduced by the Localism Act 2011 which are not funded by section 31 grants. As required in the NNDR3 guidance notes, the former categories of discretionary relief prior to the Localism Act should be applied first in the sequence of discretionary reliefs and, therefore, before any relief provided under the COVID-19 Additional Relief Fund (CARF). Billing authorities may wish to use their discretionary powers to offer further discounts outside this scheme. However, where an authority applies a locally funded relief, this must be applied after CARF.



## Recalculation of relief

16. Depending upon how local authorities choose to award CARF, the amount of relief awarded may need to be recalculated in the event of a change of circumstances. This could include, for example, a backdated change to the rateable value or the hereditament. This change of circumstances could arise during the year in question or during a later year.
17. Under regulations made under section 47 of the Local Government Finance Act 1988 authorities must give at least 12 months' notice of a revocation or variation of a rate relief scheme the effect of which would be to increase rate bills (other than to comply with any international agreement). Such a revocation or variation can only take effect at the end of a financial year but, within these regulations, local authorities may still make decisions which are conditional upon eligibility criteria. If a change in circumstances renders a property ineligible or reduces the value of the award, the relevant bill can be amended in the year to reflect the loss of the relief.
18. Therefore, when making an award for CARF, local authorities should ensure in the conditions of the award that the relief are subject to the property's continuing eligibility.

## Subsidy Control

### *Trade and Co-operation Agreement*

19. Providing discretionary relief to ratepayers is likely to amount to a subsidy. Any relief provided by Local Authorities under the CARF Scheme will need to comply with the UK's domestic and international subsidy control obligations (see the [BEIS guidance for public authorities](#) which explains the subsidies chapter of the UK-EU Trade and Cooperation Agreement (TCA), World Trade Organisation rules on subsidies, and other international subsidy control commitments).

### *Small Amounts of Financial Assistance Allowance*

20. To the extent that a Local Authority is seeking to provide relief that falls within the Small Amounts of Financial Assistance Allowance, Article 364 of the TCA allows an economic actor (e.g. a holding company and its subsidiaries) to receive up to 325,000 Special Drawing Rights (£343,000 as at 9 December 2021) in a three-year period (consisting of the current financial year and the two previous financial years). To administer a subsidy under the Small Amounts of Financial Assistance Allowance it is necessary for the Local Authority to establish that the award of subsidy will not result in the economic actor having received more than £343,000 of subsidy under the Small Amounts of Financial Assistance Allowance.

### *The COVID-19 Additional Relief Fund Allowance*

21. Where the Small Amounts of Financial Assistance Allowance has been reached, additional relief may be awarded in compliance with the principles set out in Article 366 of the TCA and in compliance with Article 364.3 of the TCA. For the purposes of this scheme, the COVID-19 Additional Relief Fund Allowance, permits an economic actor to receive additional relief of up to a further £1,900,000 for COVID-19 related losses.
22. This may be combined with the Small Amounts of Financial Assistance Allowance to permit an economic actor to receive up to £2,243,000 from the CARF Scheme (or less if they have already used some of their Small Amounts of Financial Assistance limit or claimed other COVID-19 related subsidies). It should be noted that Extended Retail Discount granted in either 2020/21 or 2021/22 does not count towards these allowances, but BEIS business grants (throughout the 3 years) and any other subsidies claimed under the Small Amounts of Financial Assistance limit (such as the Retail Relief in 2019/20), or under the EU State aid de minimis limit, in the last three years, should be counted.

### *COVID-19 Additional Relief Fund Further Allowance*

23. If an economic actor has reached the £2,243,000 limit set out above, then it may still be able to receive up to a further £10 million as a COVID-19 Additional Relief Fund Further Allowance under the CARF Scheme, if it satisfies the following conditions:
  - a. the relief relates to uncovered fixed costs (i.e. costs not covered by profits or insurance etc) during the period of COVID-19 (commencing 1 March 2020). An economic actor may benefit from relief up to 70% of their uncovered costs (although this 90% limit does not apply to small businesses with fewer than 50 employees and less than £9 million turnover), and
  - b. the enterprise has shown a decline in turnover during the eligible period of at least 30% compared to the same period in 2019.
24. Therefore, local authorities will wish to ask ratepayers, on a self-assessment basis, to inform the authority if they are in breach of the above allowances. Where authorities are delivering CARF via applications then this declaration can be requested as part of the application process – sample paragraphs for which are below. As part of awarding the relief, local authorities should ask businesses to keep necessary documentation to evidence this.

## Transparency

25. Local Authorities must also ensure the transparency obligations under Article 369 of the TCA are complied with. The transparency database can be found at <https://manageuksubsidies.beis.gov.uk/>
26. If the relief is awarded under the Small Amounts of Financial Assistance Allowance, LAs must ask the recipient whether, when cumulated with any de minimis EU State Aid or Small Amounts of Financial Assistance under the TCA that the business has received in the last three years, the relief will mean that the recipient has received more than 325,000 Special Drawing Rights (approximately £343,000 as at 9 December). If it has, then the relief must be declared on the BEIS transparency database within six months of it being awarded.
27. If the relief is awarded under the COVID-19 Additional Relief Fund Allowance, Local Authorities must ask the recipient whether, when cumulated with any other support received under the allowances, the recipient has received more than £500,000. If it has, then the relief must be declared on the BEIS transparency database within six months of it being made. Awards made under the COVID-19 Additional Relief Fund Further Allowance, which by their nature will be in excess of £500,000, must also be declared on the BEIS transparency database within six months of it being made.
28. For access to and any further questions on the database, please contact the BEIS subsidy control team at [subsidycontrol@beis.gov.uk](mailto:subsidycontrol@beis.gov.uk).
29. Where Local Authorities have further questions about subsidy control or any of the above allowance and obligations, they should seek advice from their legal department in the first instance.

## Sample paragraph to include in CARF applications.

The CARF scheme is subject to the subsidies chapter within the UK-EU Trade and Cooperation Agreement (TCA). However, for CARF there is an exemption for subsidies under the value of approximately £2,243,000 per economic actor (broadly speaking, for example, a holding company and its subsidiaries). This allowance comprises 325,000 Special Drawing Rights (at current exchange rates about £343,000) for Small Amounts of Financial Assistance and a further £1,900,000 for COVID-19 related subsidy.

Therefore, to be awarded CARF you must not have claimed over the period 2019/20 to 2021/22 more than £2,243,000 from schemes which fell within the Small Amounts of Financial Assistance or COVID-19 related allowances. COVID-19 business grants you have received from local government and the

2019/20 Retail Relief should count towards this limit, but you should not count any Extended Retail Discount you have received since 1 April 2020. Further details of subsidy control can be found at:

<https://www.gov.uk/government/publications/covid-19-additional-relief-fund-carf-local-authority-guidance>

In your application for CARF you must indicate:

if you have not to date received any subsidy which fell within the Small Amounts of Financial Assistance or COVID-19 related allowances, confirm this in your application, or

if you have received other such subsidies, then you should provide the name and total value of those subsidies.

You must not apply for CARF using this form if you have already exceeded the £2,243,000 allowance. However, we will still consider applications for support under the CARF scheme if you have reached this limit provided you can evidence that you:

Intend to use the support to fund uncovered fixed costs (costs not covered by profits for insurance etc) during the period of COVID-19. Economic actors may claim for up to 90% of their uncovered costs (although this 70% limit does not apply to small businesses with less than 50 employees and less than £9 million turnover), and

have shown a decline in turnover of at least 30% within the April 2020 to March 2021 period, compared to the same 2019 to 2020 period.

You may claim up to a further £10 million of additional allowance (on top of the £2,243,000) if you meet the above tests and you have not claimed any other support from the additional allowance up to an aggregate £10 million limit (such as from the COVID-19 business grants).

The Government and [*name of local authority*] will not tolerate any business falsifying their records or providing false evidence to gain this discount, including claiming support above these thresholds. A ratepayer who falsely applies for any relief, or provides false information or makes false representation in order to gain relief may be guilty of fraud under the Fraud Act 2006.

## New Burdens

30. The Government recognises that the implementation of this policy will place an additional burden on local authorities. In accordance with the New Burdens doctrine the Government will conduct an assessment of the expected reasonable additional costs associated with the implementation of the policy, working closely with local government in doing so.

## Annexes A-F: CARF Allocation methodology, categories and definitions

### Annex A: COVID-19 Additional Relief Fund Allocation methodology

#### Introduction

1. This document sets out the methodology used to calculate each English local authority's allocation of the £1.5bn COVID-19 Additional Relief Fund. Allocations will be paid to the authorities responsible for billing business ratepayers, known as billing authorities, which includes Shire Districts, Unitary Authorities, Metropolitan Districts and London Boroughs.

#### Proxy for impact of COVID-19

2. The allocation methodology uses the change in Gross Value Added (GVA) as a proxy for the economic impacts of COVID-19 on each business sector. The GVA data used is available here:

<https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/monthlygrossdomesticproductbygrossvalueadded>

3. The calculation uses the change in GVA compared to Feb-20 for the period April 2020 to March 2021. This data is split by business sector according to the first level Standard Industrial Classification (SIC), apart from in two cases:
  - a. Category H (Transport and Storage) has been split into two separate categories, given the large variance in Covid-19 impact between the transport and storage sectors. Details of this split are provided in Annex B.
  - b. Category X is used where a property type doesn't fit into a specific business sector (e.g. Offices) but the most common uses are likely fall into SIC categories J, K, L, M or N.
4. The allocation method uses the average of the twelve datapoints. Each month compared to Feb-20 is weighted equally. This data is for the United Kingdom.

SIC Code	Definition	Average GVA Reduction
A	Agriculture, Forestry and Fishing	-13%
B	Mining and Quarrying	-8%

C	Manufacturing	-9%
D	Energy	-1%
E	Water and Waste Management	0%
F	Construction	-14%
G	Wholesale and Retail	-8%
I	Hospitality	-55%
J	Information and Communication	-6%
K	Financial Services	-2%
L	Real Estate Activities	-2%
M	Professional Services	-7%
N	Administrative Services	-21%
O	Public administration	1%
P	Education	-20%
Q	Health	-10%
R	Arts, Entertainment and Recreation	-34%
S	Other Services	-32%
X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services	-6%
Y	Transport	-32%
Z	Storage and Distribution	-1%

Table 1: Average GVA reduction by SIC category

### Property stock and COVID-19 impact

- For each local authority's allocation, we use information on the property stock in that area. We use the Valuation Office Agency (VOA) Ratings List as at October 2021.
- The VOA data contains information about the rateable value (RV), location and type of property for all properties liable for business rates. The type of property is determined by its Special Category Code, or SCat code.
- To account for the differing severity of Covid-19 impacts on sectors, we weight the RV of each hereditament by GVA impact. In order to do this, we have worked with the VOA to develop a mapping from SCat codes to SIC codes. This is shown in Annex C.

### Calculation of allocation

- An authority's allocation is calculated by summing RV in each SIC category and weighting it by GVA change. We then sum across each sector to get an authority's total GVA-weighted RV. Each authority's share of the total GVA-weighted RV in England is applied to the £1.5bn funds available to calculate their allocation. This can alternatively be represented as:

$$(1) \quad RV_{i,j}^w = GVA_i * RV_{i,j}$$

Calculate GVA-weighted RV change for sector  $i$  and authority  $j$ .

$$(2) \quad RV_j^w = \sum_{i=1}^n RV_{i,j}^w$$

Calculate sum of GVA-weighted RV for all sectors  $i = 1$  to  $n$ , where  $n$  is the number of sectors.

$$(3) \quad RV_{Eng}^w = \sum_{j=1}^m RV_j^w$$

Calculate sum of GVA-weighted RV for all authorities  $j = 1$  to  $m$ , where  $m$  is the number of authorities.

$$(4) \quad Allocation_j = \frac{RV_j^w}{RV_{Eng}^w} * 1,500,000,000$$

Calculate authority  $j$ 's share of the total GVA-weighted RV and multiply by the total funds available.

9. Where sectors have seen a positive change to their GVA over the relevant period, the sector RV has been given a zero weighting, as opposed to a negative weighting, in order to avoid a detrimental impact on properties within other sectors within that authority. This applies to SIC code O (Public Administration).
10. In accordance with the guidance that local authorities should not award relief to properties that have already been eligible for the Extended Retail Discount (covering Retail, Hospitality and Leisure), the Nursery Discount or the Airport and Ground Operations Support Scheme (AGOSS), the following property types have been given a zero weighting in the allocation: retail, hospitality, leisure, nurseries, and airports. For the purposes of this allocation, retail, hospitality, leisure and nursery properties are defined in Annex D, and airports are defined in Annex E.
11. In order to ensure consistency with the Central Ratings List and the fact that these industries have been relatively insulated from the adverse impacts of COVID-19, the following sectors have been deemed out of scope of the relief and given a zero weighting: networks supplying utilities and associated properties. These are defined at Annex F.
12. Allocations are rounded to the nearest pound.

## Annex B: Split of the Transport and Storage SIC1 Category

<b>Category</b>	<b>SIC2 Components</b>	<b>Description</b>
Transport	49.1-2	Rail transport
	49.3-5	Land transport
	50	Water transport
	51	Air transport
Storage and Distribution	52	Warehousing/transport support activities
	53	Postal and Courier Activities

This split, and subsequent GVA weighting, uses data from:

<https://www.ons.gov.uk/economy/economicoutputandproductivity/output/datasets/indexofservices>



## Annex C: Mapping of SIC to Special Category Code

SCat code	Special category description	SIC code	SIC definition
	<b>RETAIL SECTOR</b>		
	<b>Retail - Financial &amp; Professional Services Sub-sector</b>		
021	Banks/Insurance/Building Society Offices and Other A2 Uses	K	Financial Services
	<b>Retail - Shops Sub-sector</b>		
008	Airport Let Outs	G	Wholesale and Retail
024	Betting Offices	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
086	Departmental and Walk Round Stores (Large)	G	Wholesale and Retail
097	Factory Shops	G	Wholesale and Retail
098	Farm Shops	G	Wholesale and Retail
106	Convenience Stores	G	Wholesale and Retail
139	Hypermarkets/Superstores (over 2500m <sup>2</sup> )	G	Wholesale and Retail
152	Large Food Stores (750 - 2500m <sup>2</sup> )	G	Wholesale and Retail
154	Large Shops (750 - 1850m <sup>2</sup> )	G	Wholesale and Retail
155	Large Shops (Over 1850m <sup>2</sup> )	G	Wholesale and Retail
210	Pharmacies	G	Wholesale and Retail
235	Retail Warehouses and Foodstores	G	Wholesale and Retail
243	Sales Kiosks	G	Wholesale and Retail
249	Shops	G	Wholesale and Retail
251	Showrooms	G	Wholesale and Retail
417	Hairdressing/Beauty Salons	S	Other Services
425	Pharmacies Within/Adjacent to Surgery/Health Centre	Q	Health
429	Post Offices	G	Wholesale and Retail
442	Takeaway Food Outlet (Predominantly Off Premises)	I	Hospitality
504	Kiosks Within/Part of Specialist Property	G	Wholesale and Retail
507	Salons/Clinics Within/Part of Specialist Property	S	Other Services

508	Shops Within/Part of Specialist Property	G	Wholesale and Retail
710	Residual Malls	G	Wholesale and Retail
738	Builders Merchant	G	Wholesale and Retail
011	Amusement Arcades	R	Arts, Entertainment and Recreation
165	Markets (Other Than Livestock)	G	Wholesale and Retail
	<b>OTHER SECTOR</b>		
	<b>Assembly And Leisure Sub-sector</b>		
004	Agricultural Showgrounds (National Scheme)	R	Arts, Entertainment and Recreation
012	Amusement Parks	R	Arts, Entertainment and Recreation
014	Arenas	R	Arts, Entertainment and Recreation
022	Beach Huts	I	Hospitality
025	Bingo Halls (National Scheme)	R	Arts, Entertainment and Recreation
026	Bird Sanctuaries	R	Arts, Entertainment and Recreation
028	Bowling Alleys	R	Arts, Entertainment and Recreation
029	Bowling Centres (Indoor)	R	Arts, Entertainment and Recreation
030	Bowling Greens (Outdoor)	R	Arts, Entertainment and Recreation
047	Caravan Parks (Leisure) (National Scheme)	I	Hospitality
048	Caravan Sites and Pitches (National Scheme)	I	Hospitality
049	Casinos and Gambling Clubs	R	Arts, Entertainment and Recreation
054	Chalet Parks (National Scheme)	I	Hospitality
056	Cinemas (National Scheme)	R	Arts, Entertainment and Recreation
060	Clubhouses	R	Arts, Entertainment and Recreation
061	Clubs and Institutions	R	Arts, Entertainment and Recreation
070	Concert Halls (National Scheme)	R	Arts, Entertainment and Recreation
074	Conference and Exhibition Centres	R	Arts, Entertainment and Recreation
075	Conference Centres in Country Houses	N	Administrative Services
081	Cricket Centres	R	Arts, Entertainment and Recreation

082	Cricket Grounds (County)	R	Arts, Entertainment and Recreation
083	Cricket Grounds/Pitches (Non-County)	R	Arts, Entertainment and Recreation
084	Dance Schools and Centres	R	Arts, Entertainment and Recreation
091	Drive-In Restaurants	I	Hospitality
092	Drive-Thru Restaurants	I	Hospitality
104	Food Courts	I	Hospitality
107	Football Grounds	R	Arts, Entertainment and Recreation
108	Football Pitches	R	Arts, Entertainment and Recreation
109	Football Stadia	R	Arts, Entertainment and Recreation
116	Go Kart Rinks	R	Arts, Entertainment and Recreation
117	Golf Courses	R	Arts, Entertainment and Recreation
118	Golf Driving Ranges	R	Arts, Entertainment and Recreation
121	Greyhound Racetracks	R	Arts, Entertainment and Recreation
125	Health Farms	R	Arts, Entertainment and Recreation
128	Heritage Railways	R	Arts, Entertainment and Recreation
132	Horse Racecourses	R	Arts, Entertainment and Recreation
140	Ice Rinks	R	Arts, Entertainment and Recreation
145	Lakes With Water Sport Facilities	R	Arts, Entertainment and Recreation
164	Marinas (National Scheme)	R	Arts, Entertainment and Recreation
188	Model Villages	R	Arts, Entertainment and Recreation
191	Motor Racetracks	R	Arts, Entertainment and Recreation
195	Museums and Art Galleries (Contractors)	R	Arts, Entertainment and Recreation
196	Museums and Art Galleries (Non-Contractors)	R	Arts, Entertainment and Recreation
199	Night Clubs and Discotheques	R	Arts, Entertainment and Recreation
208	Pavilions	R	Arts, Entertainment and Recreation
213	Pleasure Piers	R	Arts, Entertainment and Recreation

214	Point to Point and Eventing Courses	R	Arts, Entertainment and Recreation
216	Polo Grounds	R	Arts, Entertainment and Recreation
225	Public Halls	R	Arts, Entertainment and Recreation
226	Public Houses/Pub Restaurants (National Scheme)	I	Hospitality
227	Public Houses/Pub Restaurants (Inc. Lodge) (National Scheme)	I	Hospitality
229	Racing Stables (National Scheme)	R	Arts, Entertainment and Recreation
234	Restaurants	I	Hospitality
236	Riding Schools and Livery Stables (National Scheme)	R	Arts, Entertainment and Recreation
237	Rifle and Weapons Ranges	R	Arts, Entertainment and Recreation
238	Roadside Restaurants (National Scheme)	I	Hospitality
239	Roller Skating Rinks	R	Arts, Entertainment and Recreation
240	Royal Palaces	R	Arts, Entertainment and Recreation
241	Rugby League Grounds	R	Arts, Entertainment and Recreation
242	Rugby Union Grounds	R	Arts, Entertainment and Recreation
252	Ski Centres	R	Arts, Entertainment and Recreation
253	Snooker Halls/Clubs	R	Arts, Entertainment and Recreation
254	Speedway Racetracks	R	Arts, Entertainment and Recreation
256	Sporting Rights	R	Arts, Entertainment and Recreation
257	Sports and Leisure Centres (LA) (Dry Only) (National Scheme)	R	Arts, Entertainment and Recreation
258	Sports and Leisure Centres (LA) (Wet and Dry) (National Scheme)	R	Arts, Entertainment and Recreation
259	Sports and Leisure Centres (Private)(Dry Only)	R	Arts, Entertainment and Recreation
260	Sports and Leisure Centres (Private)(Wet and Dry)	R	Arts, Entertainment and Recreation
261	Sports Grounds	R	Arts, Entertainment and Recreation
262	Sports Stadia	R	Arts, Entertainment and Recreation

263	Squash Courts	R	Arts, Entertainment and Recreation
264	Stables and Loose Boxes	R	Arts, Entertainment and Recreation
265	Stately Homes and Historic Houses (National Scheme)	R	Arts, Entertainment and Recreation
272	Swimming Pools (Local Authority)	R	Arts, Entertainment and Recreation
273	Swimming Pools (Private)	R	Arts, Entertainment and Recreation
277	Tennis Centres	R	Arts, Entertainment and Recreation
278	Tennis Courts/Clubs	R	Arts, Entertainment and Recreation
279	Theatres (National Scheme)	R	Arts, Entertainment and Recreation
280	Theme Parks	R	Arts, Entertainment and Recreation
283	Totalisators On Horse Racecourses	R	Arts, Entertainment and Recreation
284	Tourist Attractions	R	Arts, Entertainment and Recreation
293	Village Halls Scout Huts Cadet Huts etc	R	Arts, Entertainment and Recreation
296	War Games Courses/Misc Ag. Use	R	Arts, Entertainment and Recreation
303	Bars (valued on floorspace)	I	Hospitality
304	Zoos and Safari Parks	R	Arts, Entertainment and Recreation
403	Aquaria	R	Arts, Entertainment and Recreation
405	Boathouses	R	Arts, Entertainment and Recreation
409	Cafes	I	Hospitality
410	Changing Rooms	R	Arts, Entertainment and Recreation
416	Gymnasia/Fitness Suites	R	Arts, Entertainment and Recreation
421	Miniature Railways	R	Arts, Entertainment and Recreation
426	Pitch and Putt/Putting Greens	R	Arts, Entertainment and Recreation
431	Religious Retreats/Study Centres (Residential)	R	Arts, Entertainment and Recreation
500	Cafes/Restaurants Within/Part of Specialist Property	I	Hospitality
503	Gymnasia/Fitness Suites Within/Part of Specialist Property	R	Arts, Entertainment and Recreation

509	Sports and Leisure Centres Within/Part of Specialist Property	R	Arts, Entertainment and Recreation
715	Football Training Grounds	R	Arts, Entertainment and Recreation
739	Soccer Centres	R	Arts, Entertainment and Recreation
993	Leisure Miscellaneous	R	Arts, Entertainment and Recreation
	<b>Education Sub-sector</b>		
065	Colleges of Further Education (National Scheme)	P	Education
085	Day Nurseries/Play Schools	P	Education
159	Local Authority Schools (National Scheme)	P	Education
206	Oxbridge Colleges	P	Education
223	Public and Independent Schools (National Scheme)	P	Education
288	Universities (Excluding Oxbridge) (National Scheme)	P	Education
440	University Occupation Within Hospitals	P	Education
505	Nurseries/Creches Within/Part of Specialist Property	P	Education
995	Educational Miscellaneous	P	Education
	<b>Health Sub-sector</b>		
134	Hospitals and Clinics NHS (National Scheme)	Q	Health
135	Hospitals and Clinics (Private) (National Scheme)	Q	Health
436	Surgeries Clinics Health Centres (Contractors Valuation)	Q	Health
437	Surgeries Clinics Health Centres (Rental Valuation)	Q	Health
	<b>Hotels, Guest &amp; Boarding, Self Catering etc Sub-sector</b>		
062	Coaching Inns	I	Hospitality
077	Country House Hotels	I	Hospitality
099	Field Study Activity and Adventure Centres	R	Arts, Entertainment and Recreation
122	Guest and Boarding Houses	I	Hospitality
130	Holiday Centres	I	Hospitality
131	Holiday Homes (Self Catering)	I	Hospitality
136	Hostels	I	Hospitality
137	Hotels (3 Star and Under)	I	Hospitality
138	Hotels (4 Star and Above) and Chain Op. 3 Star (National Scheme)	I	Hospitality
160	Lodges (National Scheme)	I	Hospitality

281	Timeshare Complexes (National Scheme)	I	Hospitality
722	Serviced Apartments	I	Hospitality
	<b>Non Residential Institutions Sub-sector</b>		
067	Community Day Centres	Q	Health
156	Libraries	O	Public administration
	<b>Other - Offices Sub-sector</b>		
057	Civic and Public Buildings (Local Authority Occupations)	O	Public administration
411	Coastguard Stations	O	Public administration
415	Courts (Rental Valuation)	O	Public administration
414	Courts (Contractors Valuation)	O	Public administration
215	Police Stations	O	Public administration
418	Information/Visitor Centres	N	Administrative Services
506	Offices Within/Part of Specialist Property	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
	<b>Other - Other Sub-sector</b>		
001	AA/RAC Service Centres and Boxes	Y	Transport
003	Advertising Right	J	Information and Communication
010	Ambulance Stations	O	Public administration
013	Animal Boarding	I	Hospitality
015	Army Hereditaments	O	Public administration
039	Car Parks (NCP and Multi-Storey)	Y	Transport
040	Car Parks (Surfaced Open)	Y	Transport
041	Car Parks (Unsurfaced Open)	Y	Transport
043	Car Spaces	Y	Transport
053	Cemeteries (National Scheme)	S	Other Services
058	Civic Amenity Sites	E	Water and Waste Management
076	Contractors Huts and Compounds	F	Construction
080	Crematoria (With and Without Cemeteries) (National Scheme)	S	Other Services
100	Film and TV Studios	J	Information and Communication
101	Fire Stations	O	Public administration
102	Fish Farms	A	Agriculture, Forestry and Fishing
111	Funeral Parlours/Chapels Of Rest	S	Other Services
112	Game Farms	R	Arts, Entertainment and Recreation
123	Gypsy Camp Sites (Short Stay)	I	Hospitality
124	Hatcheries/Poultry Farms	A	Agriculture, Forestry and Fishing
141	Interactive Telephone Kiosks	J	Information and Communication

		X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
143	Kennels and Catteries		
144	Laboratories	M	Professional Services
146	Land Used For Advertising	J	Information and Communication
147	Land Used For Car Boot Sales	G	Wholesale and Retail
150	Landfill Sites	E	Water and Waste Management
189	Moorings (Floating Hereditaments)	I	Hospitality
190	Mortuaries	O	Public administration
197	Navy Hereditaments	O	Public administration
202	Observatories	M	Professional Services
224	Public Conveniences (National Scheme)	O	Public administration
228	Public Telephone Kiosks (National Scheme)	J	Information and Communication
230	RAF Hereditaments	O	Public administration
232	Recording Studios	J	Information and Communication
269	Stud Farms	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
270	Studios	R	Arts, Entertainment and Recreation
285	Training Centre (Non Residential)	Q	Health
292	Veterinary Clinics / Animal Clinics	M	Professional Services
294	Vineyards/Wineries	C	Manufacturing
298	Waste Recycling Plants	E	Water and Waste Management
302	Windmills	C	Manufacturing
420	Lifeboat Stations	O	Public administration
424	Pet Grooming Parlours	M	Professional Services
428	Police Training Colleges	P	Education
438	Telescope Sites	O	Public administration
439	University - Ancillary Land or Buildings	P	Education
501	Car Parking Within/Part of Specialist Property	Y	Transport
513	Miscellaneous Within/Part of Specialist Property	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
725	Park and Ride Car Parks	Y	Transport
992	Commercial Miscellaneous	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services



998	Crown Miscellaneous	O	Public administration
		X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
999	Miscellaneous		
	<b>Other - Retail Sub-sector</b>		
018	ATMs	K	Financial Services
019	Auction Rooms	G	Wholesale and Retail
038	Car Auction Buildings/Sites	G	Wholesale and Retail
042	Car Showrooms	G	Wholesale and Retail
044	Car Supermarkets	G	Wholesale and Retail
045	Car Washes (Stand Alone)	G	Wholesale and Retail
046	Car/Caravan Sales/Display/Hiring Sites	G	Wholesale and Retail
114	Garden Centres	G	Wholesale and Retail
757	Plant Nurseries	G	Wholesale and Retail
133	Hospital Let Outs	G	Wholesale and Retail
193	Motorway Service Area Let Outs	G	Wholesale and Retail
194	Motorway and Major Road Service Areas	G	Wholesale and Retail
209	Petrol Filling Stations (National Scheme)	G	Wholesale and Retail
211	Photographic Booths	G	Wholesale and Retail
250	Showhouses (National Scheme)	G	Wholesale and Retail
266	Station Let Outs	G	Wholesale and Retail
419	Land Used for Display	G	Wholesale and Retail
427	Pitches for Stalls Sales or Promotions	G	Wholesale and Retail
432	Sales Offices	L	Real Estate Activities
	<b>Residential Institutions Sub-sector</b>		
201	Nursing Homes (Inc. Old Peoples Homes)	Q	Health
220	Prison Service Hereditaments	O	Public administration
286	Training Centre (Residential)	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
	<b>Storage &amp; Distribution Sub-sector</b>		
119	Grain Silos	Z	Storage and Distribution
120	Granaries and Intervention Stores	Z	Storage and Distribution
157	Liquid Bulk Storage (Incl Petrol and Oil) (National Scheme)	Z	Storage and Distribution
404	Archives	O	Public administration
412	Cold Stores (Contractors Valuation)	Z	Storage and Distribution

413	Cold Stores (Rental Valuation)	Z	Storage and Distribution
	<b>Transport Sub-sector</b>		
005	Air Ports (Minor) (National Scheme)	Y	Transport
006	Air Strips (National Scheme)	Y	Transport
036	Bus Stations	Y	Transport
059	Civil Airports	Y	Transport
089	Docks and Harbours (Non-Statutory)	Y	Transport
126	Heliports	Y	Transport
161	Lorry Parks	Y	Transport
231	Railways and Tramways (Non Leisure)	Y	Transport
282	Tolls (Ferries Roads and Bridges)	Y	Transport
287	Truck Stops	G	Wholesale and Retail
712	Rail Freight Depots	Y	Transport
714	Rail Maintenance Depots	Y	Transport
737	Ferry Terminal	Y	Transport
	<b>Utilities Sub-sector</b>		
066	Communication Stations (National Scheme)	J	Information and Communication
088	District Heating Undertakings and Networks	D	Energy
090	Domestic Fuel Installations	O	Public administration
094	Electricity Undertakings (Non-Statutory)	D	Energy
115	Gas Processing Plants	D	Energy
149	Landfill Gas Generator Sites	D	Energy
219	Power Generators	D	Energy
246	Sewage Works (National Scheme)	E	Water and Waste Management
275	Telecommunications Cable Networks (National Scheme)	J	Information and Communication
276	Telecommunications Switching Centres	J	Information and Communication
300	Water Undertakings (Non-Statutory)	E	Water and Waste Management
726	Telecommunications Large Broadcast Sites	J	Information and Communication
729	Renewable Generators – Mixed Technologies	D	Energy
733	Battery Storage	D	Energy
741	Independent Gas Transporter	D	Energy
742	Independent Distribution Network Operator	D	Energy
743	Renewable Power Generator - Photovoltaic	D	Energy

744	Renewable Power Generator - Wind	D	Energy
745	Renewable Power Generator - Other	D	Energy
746	Renewable Power Generator - Hydro	D	Energy
747	Fossil Fuel Power Station	D	Energy
748	Nuclear Power Station	D	Energy
	<b>OFFICE SECTOR</b>		
	<b>Offices Sub-sector</b>		
203	Offices (Inc Computer Centres)	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
204	Offices (Headquarters/Institutional)	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
	<b>INDUSTRY SECTOR</b>		
	<b>General Industrial Sub-sector</b>		
105	Food Processing Centres	C	Manufacturing
110	Foundries	C	Manufacturing
289	Vehicle Repair Workshops and Garages	G	Wholesale and Retail
408	Business Units	X	J-N: Information, Communication, Financial Intermediation, Real Estate and Business Services
512	Workshops Within/Part of Specialist Property	C	Manufacturing
096	Factories Workshops and Warehouses (Incl Bakeries and Dairies)	C	Manufacturing
153	Large Industrials (Over 20 000m <sup>2</sup> )	C	Manufacturing
192	Motor Vehicle Works	C	Manufacturing
198	Newspaper Printing Works (National Scheme)	C	Manufacturing
207	Paper Mills	C	Manufacturing
	<b>Industry - Storage &amp; Distribution Sub-sector</b>		
034	Bullion/Money Stores (National Scheme)	Z	Storage and Distribution
129	High Tech Warehouses	Z	Storage and Distribution
148	Land Used For Storage	Z	Storage and Distribution
151	Large Distribution Warehouses	Z	Storage and Distribution
217	Post Office Sorting Centres	Z	Storage and Distribution
267	Storage Depots	Z	Storage and Distribution
268	Stores	Z	Storage and Distribution

301	Wholesale Warehouses	G	Wholesale and Retail
510	Stores Within/Part of Specialist Property	Z	Storage and Distribution
511	Warehouses Within/Part of Specialist Property	Z	Storage and Distribution
721	Self Storage Facility	Z	Storage and Distribution
	<b>Industry Other Sub-sector</b>		
068	Computer Centres (Non-Purpose Built)	N	Administrative Services
069	Computer Centres (Purpose Built)	N	Administrative Services
007	Aircraft Works With Airfields	C	Manufacturing
009	Aluminium Smelting Works	C	Manufacturing
016	Artificial Fibre Works	C	Manufacturing
017	Asphalt Plants	C	Manufacturing
020	Baling Plant	C	Manufacturing
023	Beet Sugar Factories	C	Manufacturing
027	Boat Yards	C	Manufacturing
031	Breweries (National Scheme)	C	Manufacturing
032	Brickworks (Traditional) Clay Tile/Pipe Works	C	Manufacturing
033	Bulk Cement Storage Depots	C	Manufacturing
037	Cable Head End Buildings	J	Information and Communication
050	Cattle Breeding Centres	A	Agriculture, Forestry and Fishing
051	Cement Tile Works	C	Manufacturing
052	Cement Works	C	Manufacturing
055	Chemical Works	C	Manufacturing
063	Coking and Carbonising Plants	C	Manufacturing
071	Concrete Batching Plants	C	Manufacturing
072	Concrete Block Works	C	Manufacturing
073	Concrete Product Works	C	Manufacturing
079	Creameries	C	Manufacturing
087	Distilleries	C	Manufacturing
093	Effluent Minewater Treatment Plant and Premises	E	Water and Waste Management
095	Exhaust and Tyre Centres	G	Wholesale and Retail
103	Flour Mills (National Scheme)	C	Manufacturing
113	Garages (Transport and Commercial)	Y	Transport
127	Hereditals Used For Primary Treatment/Processing Of Minerals	B	Mining and Quarrying
142	Iron and/or Steel Works	C	Manufacturing
158	Livestock Markets (National Scheme)	C	Manufacturing
162	Maltings - Non Trad	C	Manufacturing
163	Maltings - Trad	C	Manufacturing
166	Mechanised Handling Depots	Z	Storage and Distribution

167	Mineral Producing Hereditament - Blockstone	B	Mining and Quarrying
168	Mineral Producing Hereditament - Brine	B	Mining and Quarrying
169	Mineral Producing Hereditament - Chalk	B	Mining and Quarrying
170	Mineral Producing Hereditament - China Clay	B	Mining and Quarrying
171	Mineral Producing Hereditament - Clay	B	Mining and Quarrying
172	Mineral Producing Hereditament - Coal	B	Mining and Quarrying
173	Mineral Producing Hereditament - Fluorspar	B	Mining and Quarrying
174	Mineral Producing Hereditament - Gas	B	Mining and Quarrying
175	Mineral Producing Hereditament - Hardrock	B	Mining and Quarrying
176	Mineral Producing Hereditament - Inert	E	Water and Waste Management
177	Mineral Producing Hereditament - Oil	B	Mining and Quarrying
178	Mineral Producing Hereditament - Other Mineral Category	B	Mining and Quarrying
179	Mineral Producing Hereditament - Putrescible	E	Water and Waste Management
180	Mineral Producing Hereditament - Sand and Gravel	B	Mining and Quarrying
181	Mineral Producing Hereditament - Shale Burnt	B	Mining and Quarrying
182	Mineral Producing Hereditament - Shale Unburnt	B	Mining and Quarrying
183	Mineral Producing Hereditament - Slate	B	Mining and Quarrying
184	Mineral Producing Hereditament With Batching Plant	B	Mining and Quarrying
186	Mineral Producing Hereditament With Tunnel Kiln	B	Mining and Quarrying
187	MOD Hereditaments	O	Public administration
200	Nuclear Establishments	E	Water and Waste Management
205	Oil Refineries	C	Manufacturing
212	Pipelines	Y	Transport
218	Potteries	C	Manufacturing
221	Properties Involving Extraction Of Materials For Profit	B	Mining and Quarrying
222	Provender Mills (National Scheme)	C	Manufacturing
233	Refuse Destructor Plants/Disposal Sites	E	Water and Waste Management

244	Scrap Metal/Breakers Yard	E	Water and Waste Management
245	Sea Dredged Aggregate Processing Plants and Depots	B	Mining and Quarrying
247	Ship Building Yards	C	Manufacturing
248	Ship Repair Yards	C	Manufacturing
255	Spoil Heap Workings	B	Mining and Quarrying
274	Tanneries	C	Manufacturing
290	Vehicle Testing Centres (With Test Tracks)	C	Manufacturing
291	Vehicle Testing Centres (Without Test Tracks)	O	Public administration
295	Wafer Fabrications (National Scheme)	C	Manufacturing
297	Waste Incinerator Plants	E	Water and Waste Management
299	Waste Transfer Stations	E	Water and Waste Management
400	Abattoirs and Slaughter Houses (Contractors Valuation)	C	Manufacturing
401	Abattoirs and Slaughter Houses (Rental Valuation)	C	Manufacturing
402	Agricultural Research Centres	M	Professional Services
406	Bus Garages (Contractors Valuation)	Y	Transport
407	Bus Garages (Rental Valuation)	Y	Transport
422	Pack Houses	A	Agriculture, Forestry and Fishing
423	Peat Fields	B	Mining and Quarrying
430	Pumping Mines	B	Mining and Quarrying
433	Statutory Docks and Harbours (Formula)	Y	Transport
434	Statutory Docks and Harbours (Non-Formula Prescribed)	Y	Transport
435	Statutory Docks and Harbours (Other)	Y	Transport
441	Weighbridges	Y	Transport
502	Garages Within/Part of Specialist Property	Y	Transport
994	Industrial Miscellaneous	C	Manufacturing
997	Minerals Miscellaneous	B	Mining and Quarrying

## Annex D: Definition of Retail, Hospitality and Leisure properties

<b>SCat Code</b>	<b>Special category description</b>
4	Agricultural Showgrounds (National Scheme)
8	Airport Let Outs
11	Amusement Arcades
12	Amusement Parks
14	Arenas
19	Auction Rooms
22	Beach Huts
24	Betting Offices
25	Bingo Halls (National Scheme)
26	Bird Sanctuaries
28	Bowling Alleys
29	Bowling Centres (Indoor)
30	Bowling Greens (Outdoor)
38	Car Auction Buildings/Sites
42	Car Showrooms
44	Car Supermarkets
45	Car Washes (Stand Alone)
46	Car/Caravan Sales/Display/Hiring Sites
47	Caravan Parks (Leisure) (National Scheme)
48	Caravan Sites and Pitches (National Scheme)
49	Casinos and Gambling Clubs
54	Chalet Parks (National Scheme)
56	Cinemas (National Scheme)
60	Clubhouses
61	Clubs and Institutions
62	Coaching Inns
70	Concert Halls (National Scheme)
74	Conference and Exhibition Centres
75	Conference Centres in Country Houses
77	Country House Hotels
81	Cricket Centres
82	Cricket Grounds (County)
83	Cricket Grounds/Pitches (Non-County)
84	Dance Schools and Centres
85	Day Nurseries/Play Schools
86	Departmental and Walk Round Stores (Large)
91	Drive-In Restaurants
92	Drive-Thru Restaurants
97	Factory Shops
98	Farm Shops
99	Field Study Activity and Adventure Centres

104	Food Courts
106	Convenience Stores
107	Football Grounds
108	Football Pitches
109	Football Stadia
114	Garden Centres
116	Go Kart Rinks
117	Golf Courses
118	Golf Driving Ranges
121	Greyhound Racetracks
122	Guest and Boarding Houses
125	Health Farms
128	Heritage Railways
130	Holiday Centres
131	Holiday Homes (Self Catering)
132	Horse Racecourses
136	Hostels
137	Hotels (3 Star and Under)
138	Hotels (4 Star and Above) and Chain Op. 3 Star (National Scheme)
139	Hypermarkets/Superstores (over 2500m2)
140	Ice Rinks
145	Lakes With Water Sport Facilities
152	Large Food Stores (750 - 2500m2)
154	Large Shops (750 - 1850m2)
155	Large Shops (Over 1850m2)
160	Lodges (National Scheme)
164	Marinas (National Scheme)
165	Markets (Other Than Livestock)
188	Model Villages
191	Motor Racetracks
195	Museums and Art Galleries (Contractors)
196	Museums and Art Galleries (Non-Contractors)
199	Night Clubs and Discotheques
208	Pavilions
209	Petrol Filling Stations (National Scheme)
210	Pharmacies
211	Photographic Booths
213	Pleasure Piers
214	Point to Point and Eventing Courses
216	Polo Grounds
225	Public Halls
226	Public Houses/Pub Restaurants (National Scheme)
227	Public Houses/Pub Restaurants (Inc. Lodge) (National Scheme)
229	Racing Stables (National Scheme)
234	Restaurants
235	Retail Warehouses and Foodstores



236	Riding Schools and Livery Stables (National Scheme)
237	Rifle and Weapons Ranges
238	Roadside Restaurants (National Scheme)
239	Roller Skating Rinks
240	Royal Palaces
241	Rugby League Grounds
242	Rugby Union Grounds
243	Sales Kiosks
249	Shops
250	Showhouses (National Scheme)
251	Showrooms
252	Ski Centres
253	Snooker Halls/Clubs
254	Speedway Racetracks
256	Sporting Rights
257	Sports and Leisure Centres (LA) (Dry Only) (National Scheme)
258	Sports and Leisure Centres (LA) (Wet and Dry) (National Scheme)
259	Sports and Leisure Centres (Private)(Dry Only)
260	Sports and Leisure Centres (Private)(Wet and Dry)
261	Sports Grounds
262	Sports Stadia
263	Squash Courts
264	Stables and Loose Boxes
265	Stately Homes and Historic Houses (National Scheme)
266	Station Let Outs
272	Swimming Pools (Local Authority)
273	Swimming Pools (Private)
277	Tennis Centres
278	Tennis Courts/Clubs
279	Theatres (National Scheme)
280	Theme Parks
281	Timeshare Complexes (National Scheme)
283	Totalisators On Horse Racecourses
284	Tourist Attractions
293	Village Halls Scout Huts Cadet Huts etc
296	War Games Courses/Misc Ag. Use
303	Bars (valued on floorspace)
304	Zoos and Safari Parks
403	Aquaria
405	Boathouses
409	Cafes
410	Changing Rooms
416	Gymnasia/Fitness Suites
417	Hairdressing/Beauty Salons
421	Miniature Railways
425	Pharmacies Within/Adjacent to Surgery/Health Centre

426	Pitch and Putt/Putting Greens
431	Religious Retreats/Study Centres (Residential)
432	Sales Offices
442	Takeaway Food Outlet (Predominantly Off Premises)
500	Cafes/Restaurants Within/Part of Specialist Property
503	Gymnasia/Fitness Suites Within/Part of Specialist Property
504	Kiosks Within/Part of Specialist Property
505	Nurseries/Creches Within/Part of Specialist Property
507	Salons/Clinics Within/Part of Specialist Property
508	Shops Within/Part of Specialist Property
509	Sports and Leisure Centres Within/Part of Specialist Property
710	Residual Malls
722	Serviced Apartments
738	Builders Merchant
739	Soccer Centres
757	Plant Nurseries
993	Leisure Miscellaneous

## Annex E: Definition of airports

<b>SCat code</b>	<b>Special category description</b>
005	Air Ports (Minor) (National Scheme)
059	Civil Airports

## Annex F: Definition of network supplying utilities and associated properties

<b>SCat code</b>	<b>Special category description</b>
094	Electricity Undertakings (Non-Statutory)
115	Gas Processing Plants
212	Pipelines
275	Telecommunications Cable Networks (National Scheme)
276	Telecommunications Switching Centres
300	Water Undertakings (Non-Statutory)
726	Telecommunications Large Broadcast Sites
729	Renewable Generators – Mixed Technologies
741	Independent Gas Transporter
742	Independent Distribution Network Operator
743	Renewable Power Generator - Photovoltaic
744	Renewable Power Generator - Wind
745	Renewable Power Generator - Other
746	Renewable Power Generator - Hydro
747	Fossil Fuel Power Station
748	Nuclear Power Station



**Report for: Cabinet**

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<b>Date of Meeting:</b>	23 June 2022
<b>Subject:</b>	Extension Household Support Fund
<b>Key Decision:</b>	Yes - it affects the whole Borough and spend over £500k .
<b>Responsible Officer:</b>	Charlie Stewart - Corporate Director, Resources
<b>Portfolio Holder:</b>	Councillor Stephen Greek - Portfolio Holder for Performance, Communications & Customer Experience
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix 1: Household Support Fund Policy Document Appendix 2: Equality Impact Assessment

## Section 1 – Summary and Recommendations

The Government announced in March 2022 that an extension to the previous Household Support Fund (HSF) will be made available to Councils in England to support those most in need to help with the rising cost of living. This funding will cover the period 01 April 2022 to 30 September 2022 inclusive.

Harrow Council has been allocated an indicative grant of £1,476,707, which must be spent by 30 September 2022. The extended Household Support Fund's main objective is to provide support to vulnerable households with significantly rising living costs, with a greater emphasis on offering support with energy bills, whilst food and water bills also remain priorities.

This paper proposes how Harrow Council would spend the indicative Household Support Fund before 30 September 2022.

### Recommendations:

Cabinet is requested to:

1. Approve the allocation of the extension of the Household Support Fund as set out in this report;
2. Approve the purchase of vouchers for the elements identified in this report through the Post Office Voucher Scheme;
3. Approve the award of contract to the Post Office for a value of £511,250 using Regulation 32 (2) (C) of the Public Contract Regulations 2015 which permits contracting authorities to award public contracts by negotiated procedure without prior publication;
4. Delegate to the Corporate Director Resources in consultation with the Cabinet Member for Performance, Communications and Customer Experience to make technical scheme amendments to ensure the scheme meets the criteria set by the Government and the Council and remains within the indicative grant level; and
5. To grant delegation to make technical changes to the proposed scheme to the Corporate Director – Resources in consultation with the Cabinet Member for Performance, Communications and Customer Experience, should the grant level or the delivery plan submitted change.

### Reason: (for recommendations)

The recommendations in this report meet the essential criteria for the grant as set out by DWP. The Council have considered where best to focus the funding and the proposals provide a balance of support together with focus so that the funding is not spread too thinly. The proposal for the eligible spend covers the following:

- Free school meals, which have previously been found to provide effective support to vulnerable households with children.

- Vouchers for households with children in receipt of housing benefit which can be redeemed against an energy or utility bill and/or costs associated with food or other related essential costs
- Help Harrow. This is a joint venture with the voluntary and community sector, which has shown to be effective in providing essential food support quickly and effectively to any vulnerable household.
- Support with rent arrears to help stop vulnerable households spiralling into acute difficulties, avoid court action and secure their tenancy.
- Pensioners on Council Tax Support and Pension Credit will be offered a voucher which can be redeemed against an energy or utility bill and/or costs associated with food and other related essential costs.

## **Section 2 – Report**

### **Introductory paragraph**

Harrow Council has been allocated an indicative grant of £1,476,707 to deliver the extension Household Support Fund which has subsequently been approved and sets the maximum the Council can spend on the fund. Although the grant is indicative, and the Council was required to provide a delivery plan to DWP by 29 April, the expectation is that the grant level and the delivery plan as submitted would not change.

The allocated grant must be spent by 30 September 2022 and local authorities have been asked to start making immediate preparations to administer the grant. As the cost of living is currently increasing getting support to Harrow's most vulnerable residents as quickly as possible is of paramount importance.

The DWP have provided the guidance which sets the framework within which the fund must be delivered – Household Support Fund (1 April 2022 to 30 September 2022): final guidance for county councils and unitary authorities in England - Updated 29 April 2022. This requires the following:

- At least one third of the total funding to be ring-fenced to support households with children,
- at least one third to be ring-fenced to support pensioners, and
- up to one third of the total funding to other vulnerable households.
- Eligible spend includes energy and water and food, which the fund should be primarily used for. The latter can be supported in kind or through vouchers or cash. Funding can also be used for essentials linked to energy and water and wider essentials. Housing costs should only be supported in exceptional cases of genuine emergency.
- Reasonable administrative costs can also be covered.
- The fund cannot be used for advice services including debt advice or mortgage costs.
- Eligibility should not be conditional on being in employment or self-employment.

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. In doing so they should particularly consider households who cannot increase their income through work. Authorities can request applications for support or can proactively identify households who may benefit or can take a mixture of the two approaches. Where Authorities are proactively identifying households, they should consider how they can ensure that they are focusing on those in the most need to prevent escalation of problems.

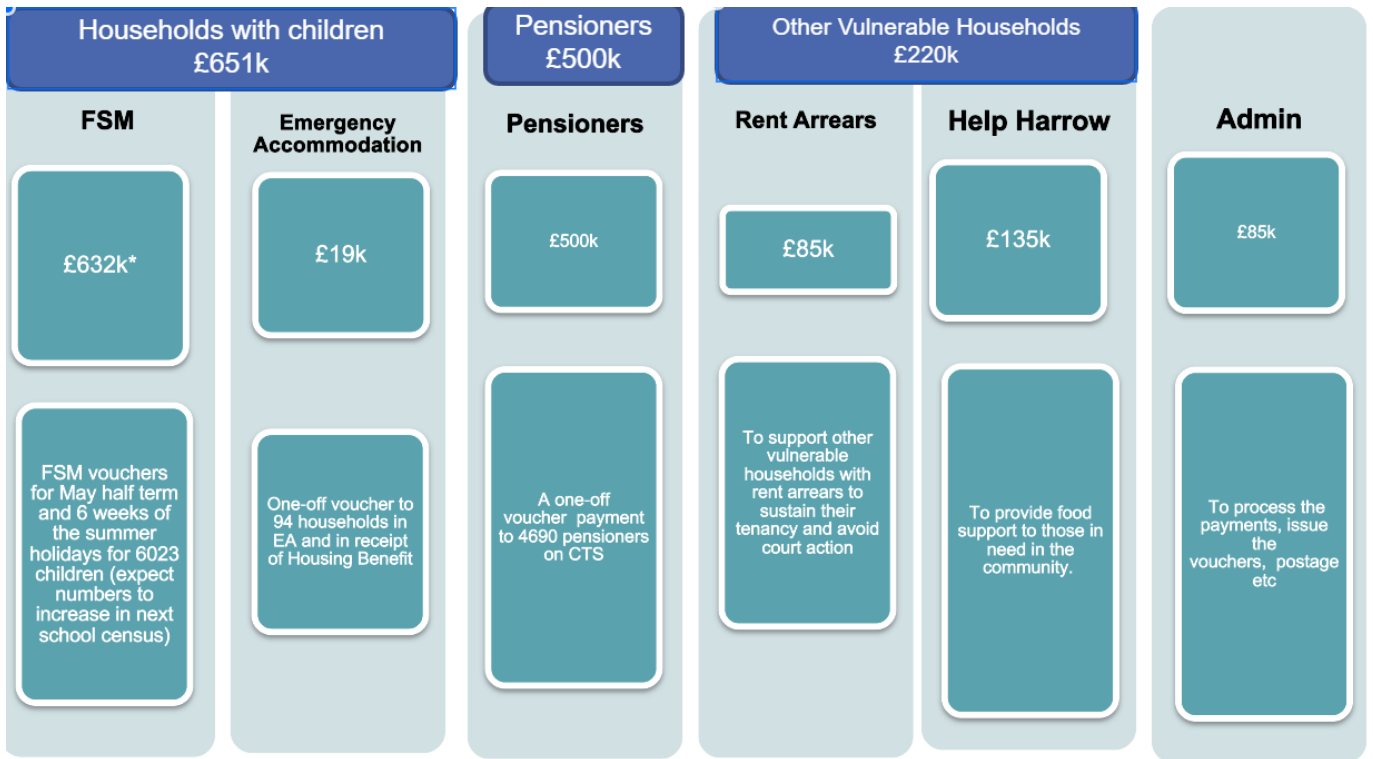
Local authorities have been asked to make preparations to administer the grant and to put arrangements in place as quickly as possible to support vulnerable households throughout the grant period. Harrow's draft delivery plan was submitted to the Department of Work and Pensions (DWP) on the 29 April, as requested, and has been subsequently approved by the DWP.

### **Options considered**

The recommendations seek to maximise the impact of this funding for households most in need in the Borough. Different options of either spreading the funds more thinly to a greater number of households or giving a higher value award to less households were considered. The recommended options provide a balance of these approaches, limited by the available data, for example limited availability of email addresses. It also seeks to use proven methods of delivering focused funding to vulnerable families and residents such as Free School Meals and Council Tax Support.

Set out below is the recommended split of funding across different streams. The value of spending for each may alter depending on caseloads at the point data is extracted through the period the scheme is running. The intention is to ensure all funding is spent by 30 September 2022 with the allocations as illustrated below.





Total £1,456m £20k underspend to be held in reserve to offset any increase in FSM numbers at next school census

More detail about each of these elements is set out below. If these allocations are agreed, then there is a reserve of £20,707, which would be held to see how spend progresses and then allocated within the framework as appropriate. It is proposed that authority to allocate it within the framework is delegated to the Corporate Director – Resources in consultation with the Cabinet Member for Performance, Communications and Customer Experience.

### **Households with Children**

#### **Free School Meals**

The provision of free school meals (FSM) to vulnerable households during the holidays from October 2020 through to Easter 2022 has been found to be incredibly effective in identifying those families in most need, and there is no other viable alternative currently. Schools already have voucher systems set up for those parents with children on free school meals, making the Council's schools funding a very efficient and effective way of giving financial support to families whose children qualify for free school meals.

The first HSF a total of £622k was spent on FSM for 6 weeks (including a £10 Christmas top up). The number of eligible children increased by 330 in that time. By providing FSM vouchers it frees up other household income to cover other costs to support them more broadly dealing with the 'cost of living' pressures.

FSM provision was recently extended into the May half term, and under this proposal would continue into the summer holidays.

According to the January school census there are 6,023 pupils who will be eligible for FSM. They will each be awarded £3 per day per child for the 6 weeks summer holidays, in addition to the recent May half term provision. Total cost:  $6,023 \times 3 \times 35 = \text{£}632,415$ .

### Emergency Accommodation

Households with children in emergency accommodation and in receipt of Housing Benefit are proposed to be given an award of £40 a month for 5 months as a one-off payment of £200.

Cohort	Number of Emergency Accommodation households	Value of monthly allocation per household x5 months	One-off payment
Households with children	94	£40	£200 (£18,800)

The vouchers will be administered via the Post Office Pay-out Scheme to meet energy cost needs.

### Pensioners

As per the DWP guidance at least 1/3rd or £492,000 of the grant must be spent on pensioners. It is proposed to award a one-off voucher payment to 4695 pensioners on Council Tax Support.

Options for flat rate or banded rate have been considered and the option with the greatest impact is to give a flat rate of £105 to all Pensioners on active Council Tax Support. This would cost circa £493k so is within the expectations of a third of the monies being used to support residents of pensionable age.

The approach of issuing vouchers carries a risk that not all vouchers issued will be redeemed, making the required spend on this cohort fall short of the 1/3rd split requirement. We will mitigate this by monitoring redemption rates on a weekly basis and issuing reminder letters, which have proven effective in the previous round in increasing redemption rates and ensuring there is capacity in the Council's contact centre to answer any enquiries. We would expect a minimum redemption rate of 80%. The value of any unredeemed vouchers by 28 September 2022 would be reprofiled into rent arrears for pensioner households on hardship fund to ensure compliance with the 1/3<sup>rd</sup> spend criteria. Any decision would be taken in consultation with the Cabinet Member for Performance, Communications and Customer Experience.

### Other Vulnerable Households

#### Rent Arrears

As per DWP guidance, in exceptional cases of genuine emergency, the funding can additionally be used to support housing costs where existing housing

support schemes do not meet this exceptional need. All other options for support must have been exhausted before an award from the Household Support Fund can be considered, for example Benefits or Discretionary Housing Payments. Awards must not be made for housing support on an ongoing basis or to support unsustainable tenancies. Cases would therefore be considered on an individual basis to understand the long-term impact of clearing all or some of the arrears.

In the previous scheme money was awarded to prevent households from facing court action and put support in place to engage with them to prevent further debts arising. However, the DWP have been clear in their guidance for this tranche of HSF that funding of advice services is not permitted.

Therefore, it is proposed that the previous arrangement to support households at risk of homelessness from private rented, temporary and council rented accommodation is continued and the following funding is allocated as follows:

£55,000 to council tenants and targeted at single people and those with disabilities;

£30,000 to emergency & temporary accommodation households and targeted at those who are vulnerable.

### Help Harrow

It is proposed that as the Community Hub is already in receipt of additional monies from the Council, having been extended until the 30 September 2022, an additional £133k is awarded from HSF that would fund the Hub for another 6 months to offer support to those in need in the community. The Hub, through the Help Harrow project, has been found to be very effective in providing food and other support to a wide range of vulnerable residents. The current funding being used to support this year's activity from April to September is flexible, so we can use the HSF to cover the period April to September (so it is spent with the grant window), and reprofile the existing funding to cover the period October to March 2023.

Food provision is one of the priorities in the DWP guidance and food is frequently what households present as not being able to afford as they have used money on other essential items. For households with a different need, provision of food may free up money to be used on other items.

### Administrative Costs

DWP have allowed Councils to use a reasonable amount of the Household Support Fund to pay for administration of the scheme. The Council will need the following additional resource to manage the grants, issue vouchers and make payments:

- Housing Support for rent arrears awards - £10k
- Contact Centre additional capacity – up to £40k

- Additional business support to administer the vouchers and payments - £10k
- Voucher admin set up costs (including extracting of data from Council Tax records for pensioner cohort), additional postage and printing of reminder letters - 25k

## Ward Councillors' comments

Not applicable.

## Performance Issues

Performance will be tracked through:

- the contract with the Post Office on redemption of vouchers so that we can assure ourselves that the take up from this cohort is maximised;
- Free school meal voucher usage through schools; and
- Help Harrow monitoring information.

## Environmental Implications

There are none.

## Data Protection Implications

A data protection impact assessment has been completed and as agreement to share any personal data is already sort from residents by CAH and our systems are already data compliant, then there are not considered to be any key data protection risks.

## Risk Management Implications

Risks included on corporate or directorate risk register? **No**

Separate risk register in place? **No**

The relevant risks contained in the register are attached/summarised below.

**N/A**

The following key risks should be taken onto account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Risk of more applicants being in the system resulting in overspend	▪ FSM – £80k had previously been committed to FSM from the public health reserve. This pot will be	Amber

	<p>retained to cover any FSM overspend due to an increase in the number of children receiving FSM over the course of the HSF scheme.</p> <ul style="list-style-type: none"> <li>▪ Emergency Accommodation – this is a relatively low number of households so low financial impact if number rises.</li> <li>▪ Other elements of the scheme – funding is limited to the amount allocated so any increase in demand will not be met.</li> <li>▪ The proposal includes a reserve of £20,707, which will be used to top up any elements where demand is higher than forecast.</li> </ul>	
Risk of funding not being committed by the September 2022 deadline	<ul style="list-style-type: none"> <li>▪ Most elements of the scheme are proactive issue of awards so do not need to be claimed by residents which reduces the risk of underspend.</li> <li>▪ Publicity will be undertaken to raise awareness, in particular with partners who are well placed to signpost pensioners to take up the vouchers.</li> <li>▪ Any unspent funds are currently being planned to be used to increase the rent arrears allocation to eligible pensioner and vulnerable households.</li> </ul>	Green
Full funding not received as a result of DWP determining that spend was not eligible	<ul style="list-style-type: none"> <li>▪ Payment of the grant from DWP will be made in arrears after the interim MI return in July 2022 and the final MI return at the end of grant period in October 2022 after the DWP have verified the MI.</li> <li>▪ The second will be dependent on DWP being satisfied that the LA's MI</li> </ul>	Amber

	<p>submission evidence eligible spend within the scheme</p> <ul style="list-style-type: none"> <li>▪ Harrow’s approach takes full account of DWP guidance on spend to ensure its scheme is within the framework.</li> <li>▪ The scheme proposal has been submitted to DWP in advance of the scheme launching. Further MI will be submitted to DWP regarding actual spend in October 2022. Any feedback from DWP in response to either of these submissions will be considered and implemented as appropriate to ensure the scheme remains compliant.</li> <li>▪ There is flexibility within the scheme to adapt it should it be necessary to make changes to the allocation of funding across the different elements once DWP feedback.</li> </ul>	
<p>The focus of funding is inappropriate/does not fulfil the fund’s objective and options limited as it is based on limited data.</p>	<ul style="list-style-type: none"> <li>▪ Regular review of allocations and spend to ensure update is appropriate.</li> <li>▪ Level of funding allocated to different strands of the scheme can be adjusted to ensure scheme remains within funding allocation.</li> <li>▪ Harrow’s draft delivery plan was submitted to the Department of Work and Pensions (DWP) on the 29 April, as requested, and has been subsequently approved by the DWP</li> </ul>	<p>Green</p>
<p>Funds duplicate existing provision</p>	<ul style="list-style-type: none"> <li>▪ Regular review of allocations against outcomes predicted from other grants to ensure there is no or limited overlap.</li> </ul>	<p>Green</p>

<p>The approach of issuing vouchers carries a risk that not all vouchers issued will be redeemed, making the required spend on this cohort fall short of the 1/3rd split requirement.</p>	<ul style="list-style-type: none"> <li>▪ We will monitor redemption rates on a weekly basis.</li> <li>▪ Issue a reminder letter,</li> <li>▪ ensure there is capacity in the Council's contact centre to answer any enquiries.</li> <li>▪ We would expect a minimum redemption rate of 80%.</li> <li>▪ The value of any unredeemed vouchers by 28 September 2022 would be reprofiled into rent arrears for pensioner households on hardship fund to ensure compliance with the 1/3<sup>rd</sup> spend criteria.</li> </ul>	<p>Amber</p>
<p>Risk of Fraud</p>	<ul style="list-style-type: none"> <li>▪ Proven methods of delivering focused funding to vulnerable families and residents such as Free School Meals and Council Tax Support.</li> <li>▪ Recipients identified by the Council</li> </ul>	<p>Green</p>

## Procurement Implications

The Council has already entered into arrangements to support the Community Hub which has had procurement sign off, so as the arrangement here is to utilise a further £135,000, which would be done by contract extension.

The Council will purchase vouchers for elements identified in this report relating to Pensioners on Council Tax Support and those in Emergency Accommodation, using Regulation 32 (2) (C) of the Public Contract Regulation 2015. This is a compliant procurement route to contract with the Post Office Pay-out Scheme for the sum of £511,250.

## Legal Implications

The DWP has issued £421million to councils to support those most in need. The funding period covers 1 April 2022 to 30 September 2022 inclusive. The DWP has issued guidance on use of the fund, which sets out eligibility criteria. The funding is being provided under section 31 of the Local Government Act

2003 and local authorities are responsible for setting criteria and administering the fund.

The Council is expected to use a range of data and sources of information to identify and provide support to a broad cross section of vulnerable households. The Council must have a clear rationale or documented policy/framework outlining its approach including defining eligibility and how the scheme is accessed. Receipt or eligibility for other support should be taken into account to avoid duplicating provision where possible.

The Council is permitted to provide a basic safety net to support individuals regardless of their immigration status if there is a genuine care need that does not arise solely from destitution. To evidence this, there should be an assessment of community care needs, serious health problems or a risk to a child's wellbeing. Individuals with no resource to public funds can be supported in accordance with specific legal powers connected to the aforementioned assessments.

The Council must have effective systems in place to combat fraud. If administration is via a third party, suitable due diligence checks must be carried out to ensure they are viable and able to deliver the scheme. There should be appropriate checks in place to verify the identity of those who are eligible. Any suspected financial irregularity must be reported to the DWP, explaining what steps are being taken to investigate the alleged fraud or other impropriety.

Reasonable administration costs can be recouped from the grant. Such administration costs will be published in the Gov.uk website alongside details of all spend.

## **Financial Implications**

The indicative grant allocation is £1,476,707. The cost of the support fund will be provided within this grant level. The grant allocation is considered unlikely to change.

## **Equalities implications / Public Sector Equality Duty**

An equality impact assessment (EQIA) has been undertaken for this proposal the EQIA concludes that:

- There will be a positive impact on those working age benefits recipients, and within those families with children;
- There will be a positive impact on those people of pensionable age
- There is likely to be a positive impact on pregnancy and maternity



- There will be a positive impact on women.

Mitigations are set out in the Equality Impact Assessment.

An updated announcement of the extension of the Household Support Fund will be published on Harrow's website, which meets the general accessibility criteria.

The Council is also developing a communications and engagement plan, which will be principally aimed at maximising take up by the pensioner group. Activity will include:

- An article in the July edition of Harrow People, which goes to every household in the Borough, indicating that if you are of pensionable age and in receipt of Council Tax support you will have received a letter with a Post Office voucher;
- Engagement with places of worship to build awareness and take up of the Post Office voucher scheme letter, which will be distributed to the pensioner cohort and the households in emergency accommodation; and
- Discussions with the Adult Services Provider Forum and the Carers Network so that those people who work with and support some of our pensioner population can encourage them to use the voucher.

## **Council Priorities**

The Council's priorities are being reviewed following the local election, but in prioritising the spend profile of the Household Support Fund, the Council is Putting Residents First by maximising the amount of the HSF going into support families directly.

## **Section 3 - Statutory Officer Clearance**

### **Statutory Officer: Dawn Calvert**

Signed by the Chief Financial Officer

**Date: 14 June 2022**

### **Statutory Officer: Sarah Wilson**

Signed on behalf of the Monitoring Officer

**Date: 7 June 2022**

### **Chief Officer: Charlie Stewart**

Signed by the Corporate Director

**Date: 10 June 2022**

### **Head of Procurement: Nimesh Mehta**

Signed by the Head of Procurement

**Date: 14 June 2022**

**Head of Internal Audit: Susan Dixson**

Signed by the Head of Internal Audit

**Date: 14 June 2022**

## **Mandatory Checks**

**Ward Councillors notified:** NO, as it impacts on all Wards

**EqIA carried out:** YES

**EqIA cleared by:** Head of Equality, Diversity and Inclusion (EDI)

## **Section 4 - Contact Details and Background Papers**

**Contact:** Angelica Stoichkov, Policy Officer,  
[Angelica.Stoichkov@harrow.gov.uk](mailto:Angelica.Stoichkov@harrow.gov.uk).

**Background Papers:** None

**Call-in waived by the Chair of Overview and Scrutiny Committee**  
NO

# Household Support Fund Policy

## Introduction

In March 2022, the Department for Work and Pensions (“DWP”) announced that an extension to the previous Household Support Fund (HSF) (“the Grant”) would be made available to Councils in England to support those most in need to help with the rising cost of living.

The paper presented to Cabinet in June 2022 provides the background, options and information on the proposed framework. This policy extracts and expands on the key criteria for the framework.

Harrow’s Household Support Fund grant allocation for the period April – September 2022 is £1,476,707.18.

## Eligibility Criteria

The Grant is limited to awards covering the funding period from 1 April 2022 to 30 September 2022. Funds must have been spent or committed before 31 September 2022 and cannot be used for future commitments.

Recipients must be households currently living within the Borough of Harrow.

Table 1 sets out additional eligibility criteria.

## Table 1: Housing Support Fund Principles and Conditions

Condition / Principle	Guidance	Criteria
<b>Households with Children</b>	At least a third of the total funding or £492,236 must be spent on families with children. These households do not have be in receipt of DWP welfare benefits	This means a household with: <ul style="list-style-type: none"> <li>1) a person who will be under the age of 19 as at 31st March 2022, <u>or</u></li> <li>2) a person aged 19 or over in respect of whom a child-related benefit is paid or free school meals are provided during the period 06 October 2021 and 31 March 2022.</li> </ul>
<b>Pensioner Households</b>	At least a third of the total funding or £492,236 must be spent on pensioners	This means a household : <ul style="list-style-type: none"> <li>- On Council Tax Support</li> </ul> Passported Pension Credit A pensioner on CTS is defined as someone who has reached the qualifying age for state pension credit. <p>However, if they have a working age partner who is in receipt of income support, income-based jobseeker's allowance, income-related employment support allowance or universal credit, then they will not be classified as a pensioner for the purpose of CTS</p>
<b>Essential Living Costs</b>	The HSF should primarily be used to support households in most need with eligible spend for essential living costs	These costs should include: <ul style="list-style-type: none"> <li>3) <b>Food</b>.</li> <li>4) <b>Energy</b> for domestic heating, cooking or lighting, including oil or portable gas cylinders.</li> <li>5) <b>Water bills</b> for drinking, washing, cooking, and sanitary purposes and sewerage.</li> <li>6) <b>Essentials</b> linked to the above, in recognition that costs may arise which directly affect a household's ability to afford or access food, energy and water. e.g.: <ul style="list-style-type: none"> <li>i. Sanitary products</li> <li>ii. Warm clothing</li> <li>iii. Soap,</li> <li>iv. Blankets</li> <li>v. Boiler service/repair,</li> <li>vi. Purchase of equipment including fridges, freezers, ovens, etc.</li> </ul> </li> </ul>
<b>Associated Living Costs</b>	The HSF can also be used to support households with certain other essential costs	7) <b>Wider essential costs</b> not linked to energy and water. These may include, but are not limited to: <ul style="list-style-type: none"> <li>i. Support with other bills including broadband or phone bills,</li> <li>ii. Other clothing</li> <li>iii. Other furniture such as mattress</li> <li>iv. Essential transport-related costs such as repairing a car, buying a bicycle or paying for fuel.</li> <li>v. Council Tax arrears</li> </ul>

Other	The HSF can be used for other means of support not covered by the above	<p><b>8) Housing costs</b>, in exceptional cases of genuine emergency where existing welfare and support i.e. the housing cost element of Universal Credit (UC), Housing Benefit (HB) or Discretionary Housing Payments (DHP) do not meet this exceptional need, the HSF can be used to support housing costs but not <b>mortgage payments</b>.</p> <p><b>9) Support to individuals with No Recourse to Public Funds (NRPF)</b>, funding can be provided, regardless of immigration status, if there is a genuine care need that does not arise solely from destitution, for example if:</p> <ul style="list-style-type: none"> <li>i. there are community care needs</li> <li>ii. they have serious health problems</li> <li>iii. there is a risk to a child's wellbeing</li> </ul> <p>Furthermore, people with no recourse to public funds can access the scheme under s.138 of the Local Government Act as long as the Covid pandemic continues to be treated as an emergency/disaster.</p>
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## Non-eligible spend

Eligible spend does not include the following:

- Advice services such as debt advice
- Mortgage costs.

## Funding for households with children

Table 2 provides the proposed funding levels for households with children

Table 2: Proposed Funding for Households with Children

Category			
<b>Families with Children in receipt of Free School Meals (FSM):</b>	<b>Estimated No of Children</b>		<b>Provisional Allocation of Funding (£)</b>
May 2022 Half-Term (5 days)	6023	£3 per day per child	£90,345
Summer Holidays (30 days)	6023	£3 per day per child plus additional £10 for Christmas	£ 542,070
	<b>Estimated No of Households</b>		<b>Provisional Allocation of Funding (£)</b>
<b>Households with Children in Emergency Accommodation and in receipt of Housing Benefit – one off payment</b>	94	£200 + postage	£18,800
<b>Total</b>			<b>£ 651,215</b>

It is forecast that the above approach will exceed the one third funding reserved for households with children. In addition, households in the borough both with and without children can apply for support funded by £135,000 for Help Harrow

### **Funding for Pensioners**

Pensioners on Council Tax Support and Pension Credit will be offered a voucher which can be redeemed at any local Post Office against an energy or water bill and/or costs associated with food and other essential or associated living costs as per the definitions above in Table 1. Beneficiaries will need to take their covering letter with their bill to the Post Office and the money will be paid directly against the bill.

Table 3 provides the proposed funding levels for pensioners

**Table 3: Proposed Funding for pensioners**

Category	Estimated No of Households	Proposed Funding per Household	Provisional Allocation of Funding (£)
Pensioners in receipt of Council Tax Support – one off payment	4690	£105 + postage	£492,450

It is anticipated that this approach will help ease the financial pressure related to energy or utility bills or the purchasing food directly.

### **Backdating**

Bills will be accepted for funding that have already been issued, as long as the bill falls within the period 4 April 2022 to 30 September 2022. All vouchers will have a 2-month expiry date to ensure awards are made prior to the 30 September 2022 deadline.

The above approach would meet the target of one third funding reserved for pensioners. In addition, households in the Borough, both with and without children, can apply for support funded by £135,000 through the Help Harrow initiative.

### **Verification**

Verification of the household's identity will be carried out by the Post Office staff to ensure its compliance. This will include proof of an admissible form of ID (Valid passport, Photo driving licence, Proof of age card such as the PASS card from the national Proof of Age Standards Scheme) and national insurance number for any awards made using a Payment Card.

A nominated third party can redeem the voucher code at a Post Office branch on behalf of the eligible recipients. A verification process will be undertaken by the Post Office to ensure compliance. The responsible adult needs to bring a copy of the letter, with their ID and a form of ID that matches the name on their letter.

## **Funding for other vulnerable households**

### Help Harrow

£135,000k of funding will be allocated to Help Harrow to support provision of food parcels to Harrow residents. Any household can self-refer by registering with the service to access support. Residents who have received assistance through other elements of the scheme are not restricted from receiving support from Help Harrow. The number of awards is not limited so the service can provide assistance over a longer period of time where required, and therefore not only assisting with urgent needs for food but also freeing up household funds to cover essentials other than food.

### Rent Arrears

£85,000 is allocated to rent arrears. Eligible households will be identified through proactive action by the Council's Housing Department according to the following criteria:

- Support with rent arrears is only eligible where no other provision is available including Housing Benefit, Universal Credit or Discretionary Housing Payments.
- The award would prevent households from facing court action, eviction and secure their tenancy
- The household engages with the Council to prevent further debts arising
- Council tenants who are single people or those with disabilities (£55k)
- Households in emergency & temporary accommodation households and targeted at those who are vulnerable. (£30k) Awards would be distributed directly to resident's rent account / landlord

Once funds have been exhausted no further awards will be made.

The funding allocations will be reviewed on a monthly basis and adjusted to ensure the one third spend on households with children and pensioners is met.

### Reserve

£20,000 will be held in reserve to top up any of the funding pots should demand be higher than forecasting advance of the 30 September 2022 grant deadline.

## **Multiple Claims**

Households may receive awards from multiple elements of the Household Support Fund.

## **Appeals**

There will be no right of appeal against a decision not to award a payment. If an applicant does not supply the necessary supporting documentation, they will be

given a single opportunity to provide this information, before the application is refused.

### **Policy review**

The policy will be subject to periodic review by the Corporate Director of Resources or his authorised officer.

### **Combatting fraud**

- Checks will be in place to verify the identity of those eligible for awards. To reduce the risk of fraud vouchers will be issued rather than cash.
- Harrow Council is required by law to protect the public funds it administers. Information provided maybe shared with other bodies responsible for auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud. Recipients are required to inform the Council immediately of changes in circumstances effecting eligibility. If fraud is detected, the authority will pursue the matter robustly including criminal prosecution and full recovery of all monies obtained.
- All awards will be made within existing compliance procedures and policies that apply to the Council's financial systems.



## Appendix 2

### Equality Impact Assessment (EqIA) June 2022



#### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Extension Household Support Fund	Date EqIA created: June 2022
Name and job title of completing/lead Officer	Alex Dewsnap, Director of Strategy and Partnerships	
Directorate/ Service responsible		
Organisational approval		
EqIA approved by Head of EDI	Name : Shumailla Dar	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA  Date of approval 13/06/22

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

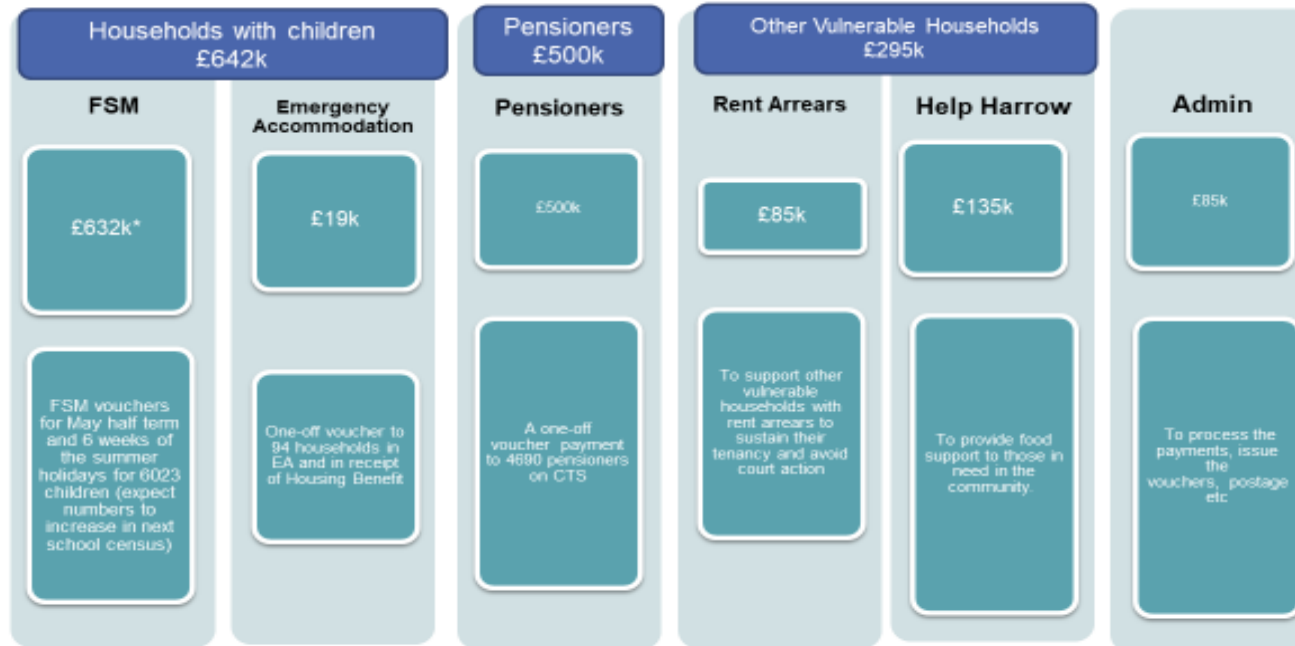
(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

Harrow's Household Support Fund grant allocation for the period April – September 2022 is £1,476,707.18. The requirements to allocate the grant are as follows:

- At least one third of the total funding to be ring-fenced to support households with children,
- at least one third to be ring-fenced to support pensioners, and
- up to one third of the total funding to other vulnerable households

# Funding Model



Total £1,456m £20k underspend to be held in reserve to offset any increase in FSM numbers at next school census

**Note:** For the purposes of this document, when referring to Black, Asian and Multi-ethnic communities, the term has been shortened and the acronym BAME is being used throughout.

**b) Summarise the impact of your proposal on groups with protected characteristics**

1. Based on the data available we do not anticipate that the delivery of the extension Household Support Fund will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics. If anything, we would expect that there would be a positive impact as the key driver is around reducing hardship and the evidence in Harrow is that some groups are more disadvantaged from an income inequality perspective than others, and would as a result of the Council's proposed allocation be positively impacted.

**c) Summarise any potential negative impact(s) identified and mitigating actions**

- While the EQIA process has not identified any negative impacts on groups with protected characteristics, the following issues should be taken into consideration:
- Population and borough profile data for Harrow referenced in this EQIA is based on 2011 Census data, which is out of date. Therefore, the population profile of the borough may have changed significantly since then. This makes it difficult to identify disproportionality and inequality faced by certain groups in Harrow. Although we will monitor the implementation of the scheme on a monthly basis, the fact that it is to be completed by the end of September 2022 makes further and more substantial changes more difficult.
- It is also recommended that equality monitoring is robust and incorporated as part of the performance monitoring process for the scheme to enable any changes to be made before September 2022.

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
<b>Age</b>	<p>Harrow has a resident population of 251,160<sup>1</sup>. It has an above average working age population aged 16-64 of just under 63% (158,000) and a growing younger population aged 0-15, which is higher than the London average, suggesting that the borough is a popular destination for families<sup>2</sup>.</p> <ul style="list-style-type: none"> <li>As with most areas in the country, the borough has an ageing population. It is expected that the number of residents aged 65 plus will increase by 38% and those aged 85 plus could increase by 60% by 2030<sup>3</sup>.</li> <li>Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>4</sup>.</li> <li>Harrow has one of the lowest proportion of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>5</sup>.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>1</sup> Nomis 2019

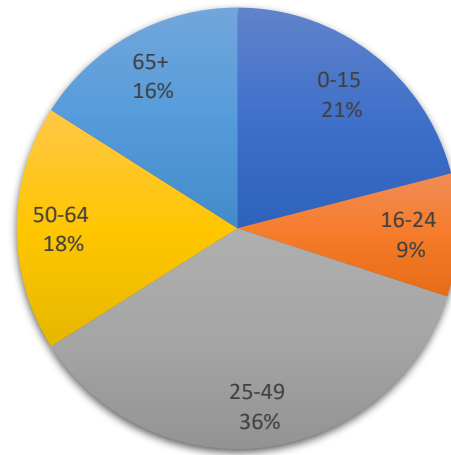
<sup>2</sup> ONS -2018 mid-year estimates

<sup>3</sup> Poppi and Pansi projections to 2030

<sup>4</sup> DWP Job claimant data April 2021

<sup>5</sup> NEETS data at December 2020.

### Population % by age band



Through the support being offered for those on Council Tax Support, the Council will be awarding to working age people only which equates to 8661 out of 13,398 CTS households. Of the 8661, 4,969 households have children and there are a total of 11,260 children in these households

The age of the claimant is shown below. Where the age is over pensionable age, this is because they are a mixed age couple and therefore classified as working age.

Under 30	668
30-39	1901
40-49	2538
50-59	2257
60+	1280

Not known	17
	8661

For those in Emergency Accommodation from the Councils Housing Benefit data the cohort who will receive an award are all households with children. The age of claimants is as follows:

Under 30	16
30-39	28
40-49	27
50-59	9
60+	3
	83

It should be noted that the number of pupils eligible for Free School Meals has increased from 3,695 in 2019 to 5,728 in 2021 (which in percentage terms is a move from 10% of the pupil population in Harrow in 2019 to 15% in 2021). Therefore the targeting of the Scheme on Free School Meals has a positive impact on those children eligible for Free School Meals.

For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against age as follows:

	Council tenants	Temporary accommodation tenants	Total
21 – 24	5 (2%)	1 (1%)	6 (2%)
25 – 34	16 (8%)	8 (10%)	24 (8%)
35 – 44	47 (23%)	26 (34%)	73 (26%)
45 – 54	59 (29%)	22 (29%)	81 (29%)
55 – 64	49 (24%)	7 (9%)	56 (20%)
65+	21 (10%)	1 (1%)	22 (8%)
Data not available	7 (3%)	12 (16%)	19 (7%)
Total	204	77	281



**Impact**

The Free school meals (FSM) element of the scheme will naturally support those families with children which although the data doesn't breakdown to assess exactly where parental age will be, it is more than likely that the majority of parents would be in the 30-60 age bracket (given as a proxy for this over 75% of those people on CTS are within this age bracket). The growth in eligibility of Free School Meals from 10-15% from 2019-2021 also has a positive impact on age for children. On this basis although the FSM, CTS and rent arrears schemes would have a positive impact on those families with children and of working age who qualify for CTS, it does not support those of retirement age and above (although the rent arrears would support some of pensionable age).

**Population over 65**

ONS Mid-Year Population Estimates for Harrow. Table 3 (Page 6) gives the breakdown by age and male/female.

Summary of 65+ year olds

Age	Male	Female	All
65-69	5,606	5,899	11,505
70-74	4,694	5,366	10,060
75-79	3,245	3,969	7,214
80-84	2,682	3,058	5,740
85-89	1,592	2,199	3,791
90+	908	1,416	2,324
<b>Total 65+</b>	<b>18,727</b>	<b>21,907</b>	<b>40,634</b>

## Disability

- ONS data for 2016-2018 shows that 19,208, (12.2%) of Harrow's working age population have a disability.
- There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity and therefore experiencing potential financial hardship.

With regards the CTS element of support, the Council's Benefits Team does not capture whether or not the claimant would classify themselves as having a disability, only whether or not the household is classified as disabled under the definition of the Harrow CTS scheme. 2,293 of the 8661 are classified as disabled, which is 26% of households. The scheme would therefore have a positive impact on those people and families who are disabled and in receipt of CTS, when compared to the population overall.

The Housing Benefits Team do not capture whether or not a Housing Benefit claimant in Emergency Accommodation would classify themselves as having a disability, only what disability benefits they receive. This is also only recorded if the services know that the benefit is received and, in most instances, only if it affects the level of entitlement. For instance, there are 6 claims where at least one member of the household in receipt of a Personal Independent Payment, and in 2 of these a member of the household is also in receipt of Employment Support Allowance.

With regards Free School Meals, across all Harrow schools, the percentage of pupils with an Education and Healthcare Plan who are eligible for FSM increased from 19.6% (223 pupils) in 2019 to 26.9% (345 pupils) in 2021. In parallel, the percentage of pupils on SEN Support Plan who are eligible for FSM increased from 17.2% (633 pupils) in 2019 to 24.1% (867 pupils) in 2021. Pupils with No SEN who are eligible for FSM increased too, from 8.8% (2,839 pupils) in 2019 to 13.6% (4,516 pupils) in 2021.



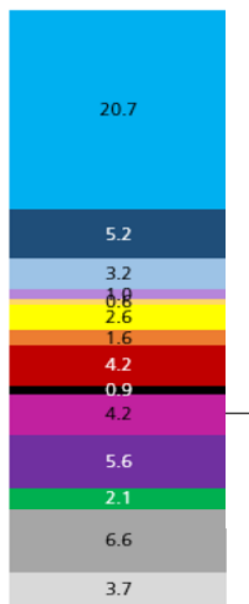
Number and percentage of Pupils eligible for Free School Meals in Harrow Primary, Secondary, Special, Nursery and PRU schools by SEN Provision (Enrolments: Current and Dual-Main)									
SEN Provision	2019			2020			2021		
	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils
Education and Health Care Plan (EHCP)	223	19.6%	1136	266	22.1%	1202	345	26.9%	1281

	SEN Support	633	17.2%	3685	718	19.8%	3627	867	24.1%	3593				
	No SEN	2839	8.8%	32440	3347	10.1%	33096	4516	13.6%	33312				
	<b>Total</b>	<b>3695</b>	<b>9.9%</b>	<b>37261</b>	<b>4331</b>	<b>11.4%</b>	<b>37925</b>	<b>5728</b>	<b>15.0%</b>	<b>38186</b>				
<p><i>Source: Spring School Census 2019, 2020 and 2021</i></p> <p><b>Impact</b></p> <p>The Council does not collect data on disability on the other aspects of support that are being offered, and as part of the monitoring information the Council would look to gather this data, which would include non-physical disabilities such as mental health. However, from the data the Council has on CTS recipients and those children eligible for Free School Meals, it can be concluded that these aspects of the scheme would have a positive impact on those people and families who are disabled and in receipt of CTS or FSM.</p>														
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.</li> <li>The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</li> </ul> <p><b>Impact</b></p> <p>At this stage there is no way of concluding whether the Household Support Fund 2 would have either a positive or negative impact on this group.</p>										<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London. At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul>										<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p><b><u>Impact</u></b></p> <p>The extension Household Support Fund implementation will aim to support residents regardless of their partnership status.</p>				
<p><b>Pregnancy and Maternity</b></p>	<ul style="list-style-type: none"> <li>• ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>• The borough has the worst infant mortality rate in London, at a rate of 5.1 deaths per 1000 live births, which is a strong indicator of poverty and inequality in the borough.</li> </ul> <p><b><u>Impact</u></b></p> <p>Although there isn't any data the Council holds for CTS or Free School Meals on whether recipients (or their parents) are either pregnant or on maternity leave the extension Household Support Fund implementation will aim to support residents regardless of their status.</p>	□	□	□	☒

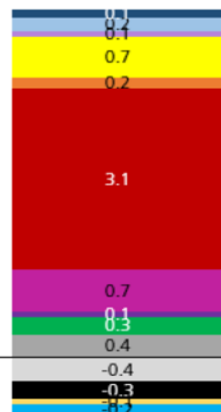
Race/  
Ethnicity

% breakdown of non-WB populations, 2019



Harrow (62.9% non-WB)

% breakdown of change in non-WB populations



- Hindu Indian
- Sri Lankan
- Other South Asian
- Iranian
- Greek/ Greek Cypriot
- Other East European
- Polish
- Romanian
- Jewish
- Other Muslim
- Pakistani
- Black African/ Caribbean
- West European and Hispanic
- Other

- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>6</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.
- The majority of 16–18-year-olds that are classed as NEET are from BAME backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.



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<sup>6</sup> Harrow Economic assessment 2019-2020:population

- At ward level Marlborough and Wealdstone have the highest number of households in need of re-housing. These respectively have a BAME population of 77% and 75%.
- The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a BAME population of 74% (2011 census).
- Some BAME residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills and therefore more likely to be in receipt of financial support through such things as Universal Credit, Council Tax support and (if there are children in the household) Free School Meals.

With regards Free School Meals, in 2021, the highest proportion of pupils who are eligible for FSM are of Traveller of Irish Heritage Background (89.6% - 60 pupils). This percentage has increase from 2019 (67.6% - 46 pupils), however the population numbers of this ethnic group are significantly low. The second highest group are of White and Black Caribbean ethnic origin (34.6% - 187 pupils), having increased from 24% (131 pupils) in 2019. The third highest group are of Black Caribbean ethnic origin (32.8% - 314 pupils). This percentage has increased from 23.4% (235 pupils) in 2019. The table below gives the full breakdown of pupils on FSM compared to the overall pupil population in Harrow for 2019-2021.

Number and percentage of Pupils eligible for Free School Meals in Harrow Primary, Secondary, Special, Nursery and PRU schools by Ethnicity (Enrolments: Current and Dual-Main)									
Ethnicity	2019			2020			2021		
	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils
Traveller of Irish Heritage	46	67.6%	68	65	73.9%	88	60	89.6%	67
White and Black Caribbean	131	24.0%	546	156	28.2%	553	187	34.6%	541
Black Caribbean	235	23.4%	1003	267	27.0%	990	314	32.8%	957
Black - African	483	21.0%	2305	526	23.2%	2272	638	29.7%	2148
Any Other Ethnic Group	348	18.7%	1857	442	22.5%	1966	592	29.7%	1994
White and Black African	68	21.3%	319	80	23.3%	343	99	28.2%	351
Any Other Black Background	80	20.0%	400	92	22.8%	403	110	27.5%	400
Gypsy / Roma	6	17.6%	34	8	16.3%	49	11	26.2%	42
Refused	44	11.9%	369	69	16.5%	418	102	21.0%	485

Any Other Mixed Background	203	15.6%	1303	231	18.0%	1280	266	20.0%	1327
Bangladeshi	38	12.4%	307	46	14.5%	318	61	18.8%	325
Any Other Asian Background	756	10.7%	7077	911	12.8%	7135	1297	18.3%	7093
White - British	448	12.4%	3623	481	13.9%	3460	565	17.1%	3296
Information Not Yet Obtained	12	12.9%	93	16	15.4%	104	20	16.4%	122
Pakistani	225	11.8%	1902	228	12.3%	1861	289	15.7%	1844
White and Asian	88	9.2%	953	122	12.1%	1007	152	14.5%	1046
White - Irish	27	7.7%	350	25	8.0%	311	27	9.6%	280
Any Other White Background	255	4.2%	6105	326	5.2%	6250	594	9.4%	6340
Chinese	6	3.3%	180	10	5.1%	197	12	5.9%	203
Indian	196	2.3%	8467	230	2.6%	8920	332	3.6%	9325
<b>Total</b>	<b>3695</b>	<b>9.9%</b>	<b>37261</b>	<b>4331</b>	<b>11.4%</b>	<b>37925</b>	<b>5728</b>	<b>15.0%</b>	<b>38186</b>

Source: Spring School Census 2019, 2020 and 2021

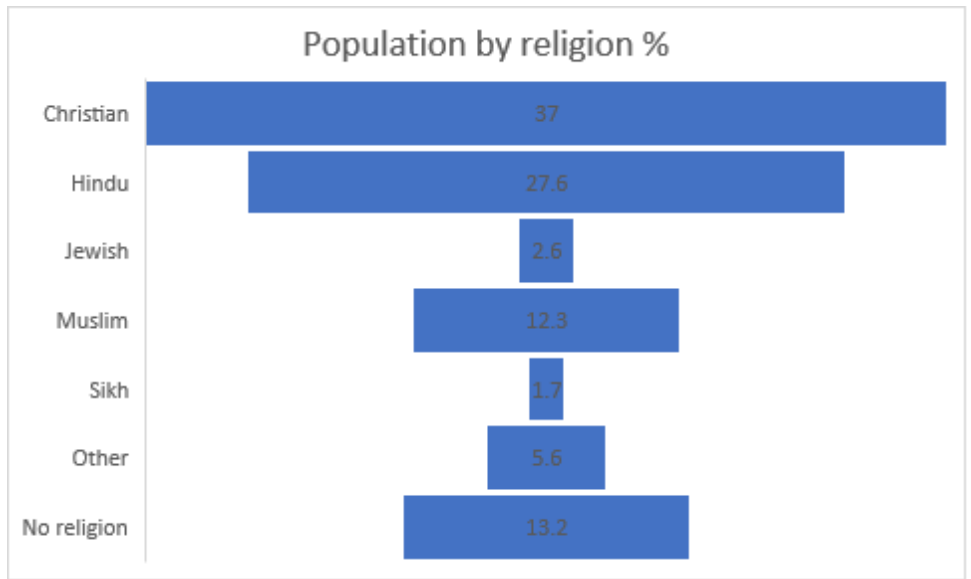
For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against ethnicity as follows:

	Council tenants	Temporary accommodation tenants	Total
Asian / Asian British	25 (12%)	13 (17%)	38 (14%)
Black / African / Caribbean / Black British	66 (32%)	16 (20%)	82 (29%)
Mixed / multiple ethnic groups	13 (6%)	2 (3%)	15 (5%)
White	50 (25%)	13 (17%)	63 (22%)
Other ethnic group	5 (2%)	2 (3%)	7 (3%)
Prefer not to say	45 (22%)	31 (40%)	76 (27%)
<b>Total</b>	<b>204</b>	<b>77</b>	<b>281</b>

### **Impact**



	<p>Although there isn't any data the Council holds for CTS on the ethnicity of recipients (or their parents), the proxy indicator of BAME residents being more likely to experience barriers to work (last bullet above), would suggest that all the elements of the Household Support Scheme will have a positive impact on those with a BAME heritage, by virtue of the relationship between barriers to employment, hardship and a higher likelihood of therefore being in receipt of financial assistance. Black heritage, Bangladeshi and Pakistani pupils are also disproportionately represented on the cohort of children in receipt of Free School Meals when compared to the broader population, so again the targeting of the Scheme will have a positive impact on race/ethnicity. Similarly, looking at rent arrears data black heritage households are also disproportionately represented in this cohort, so would benefit from the scheme.</p>				
<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country. Harrow had the highest number (and proportion) of Hindu followers in the country (25.3%), the highest number of Jains (2.2%) and the second highest number of Zoroastrians. Harrow 's Jewish community was the sixth largest nationally. 37.3% of residents were Christians (the 5th lowest proportion in the country) and 12.5% were Muslims. Harrow had the 2nd lowest ranking for 'no religion'.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



- As the population’s ethnic composition changes, rates of participation in various religions are also likely to change<sup>7</sup>.
- There is limited data on employment/unemployment rates for Harrow by religion.
- Data for London suggests that educational attainment and employment among the capital's Muslim community is lower than those from other faith groups located in the borough<sup>8</sup>.

**Impact**

The Scheme will aim to support all residents regardless of their religion or belief, and where possible monitoring information will be gained to understand the impact on this characteristic.

**Sex**

- The Government’s population estimates as of mid-2019 show that the total population of Harrow is now 251,200, made up of 125,800 men and 125,400 women. Overall, the number of males and females living in Harrow is very similar.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>7</sup> Harrow Economic Assessment: 2019-2020:population

<sup>8</sup> Annual Population Survey 2018.

- Economic activity among Harrow's male population is higher than the London average at 86%, compared with 83%<sup>9</sup>. However, economic activity among females in the borough is lower than the London average at 72%.
- Harrow is a low wage borough, with both men and women that are employed in the borough earning less than the London average of £760<sup>10</sup> earning less compared to men. Women earn less than men in the borough. Average gross weekly earnings among women working in Harrow is £500, nearly 38% lower than the London average of £688<sup>11</sup>.
- While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.

With regards Free School Meals, across all Harrow schools, the percentage of Female pupils who are eligible for FSM increased from 10% (1,858 pupils) in 2019 to 14.8% (2,836 pupils) in 2021. In parallel, the percentage of Male pupils who are eligible for FSM increased from 9.8% (1,837 pupils) in 2019 to 15.2% (2,892 pupils) in 2021. In 2021, the proportion of male pupils who are eligible for FSM is marginally higher than the proportion of female pupils. This is in contrast to the previous years (2019 and 2020) where the proportion of female pupils eligible for FSM was higher than the proportion of male pupils. However, the difference does not suggest there is any disproportionate impact with regards gender for pupils in receipt of Free School Meals.

For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against female and male headed households as follows:

	Council tenants	Temporary accommodation tenants	Total
Female headed household	136 (67%)	55 (71%)	191 (68%)
Male headed household	61 (30%)	19 (25%)	80 (28%)
Data not available	7 (3%)	3 (4%)	10 (4%)
Total	204	77	281

<sup>9</sup> NOMIS: Labour supply ( at December 2020)

<sup>10</sup> NOMIS: earnings by place of work 2020

<sup>11</sup> NOMIS: earnings by place of work: 2020

	<p><b>Impact</b></p> <p>On the basis that economic activity is lower in women than in men, and earnings are less in women than men, and that the Household Support Scheme is ultimately targeted at those working age groups in greatest financial hardship, there is a higher likelihood that the scheme will have a more positive impact on women than men. More households headed by women will also receive rent support as part of the scheme as well, which is another positive impact.</p>				
<p><b>Sexual Orientation</b></p>	<ul style="list-style-type: none"> <li>• The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region<sup>12</sup>. There is no official data on sexual orientation for Harrow in relation to employment.</li> <li>• LGBT people are also likely to be underrepresented among business owners within Harrow.</li> </ul> <p><b>Impact</b></p> <p>Although there isn't any data the Council holds for CTS or Free School Meals on the sexual orientation of recipients (or their parents) the fact that there is a higher likelihood that families with children will be heterosexual couples, the Household Support Fund 2 is more likely to have a positive impact on those whose sexual orientation is heterosexual. However, the implementation of the scheme will aim to support residents regardless of their sexual orientation.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b></p> <p><input checked="" type="checkbox"/> Yes,                      No    <input type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p> <ul style="list-style-type: none"> <li>• There will be a positive impact on those working age benefits recipients, and within those families with children.</li> <li>• There will be a positive impact on those residents of working age who have a disability and are in receipt of CTS</li> <li>• There will be a positive impact on those residents of working age who are of a BAME heritage</li> </ul>					

<sup>12</sup> Trust for London: London's Poverty profile 2016.

- There will be a positive impact on women, pensioners and elderly residents, children in receipt of Free School Meals, households with children, disabled residents and residents in emergency accommodation.

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposals have an impact on individuals/service users, or other groups?**

Yes,                      No

If you clicked the Yes box, Include details in the space below

- The Household Support Fund 2 is principally to support those families in hardship, so all groups who receive funding will be from a group impacted by hardship.
- It should be noted that the number of pupils eligible for Free School Meals has increased from 3,695 in 2019 to 5,728 in 2021 (which in percentage terms is a move from 10% of the pupil population in Harrow in 2019 to 15% in 2021).

**3. Actions to mitigate/remove negative impact**

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
Limited data is available on the demographic and ethnic profile of those who will be beneficiaries of the various elements of the scheme	<ul style="list-style-type: none"> <li>• Monitoring data will be developed as the scheme is rolled out and reported on a monthly basis</li> </ul>	<ul style="list-style-type: none"> <li>• The Monthly data will be reported to the Council's Covid Silver Group and if necessary further demographic data will be sought to support the overall understanding of the impact of the scheme.</li> </ul>	Sep 2022	Angelica Stoichkov

205

<p><u>Post Office Voucher Scheme</u> Ensuring any communication disseminated to recipients is accessible and understood by those with language barrier or learning disability.</p>	<ul style="list-style-type: none"> <li>• An updated announcement of the extension of the Household Support Fund will be published on Harrow's website, which meets the general accessibility criteria.</li> <li>• The Council is also developing a communications and engagement plan, which will be principally aimed at maximising take up by the pensioner group. Activity will include: <ul style="list-style-type: none"> <li>- An article in the July edition of Harrow People, which goes to every household in the Borough, indicating that if you are of pensionable age and in receipt of Council Tax support you will have received a letter with a Post Office voucher;</li> <li>- Engagement with places of worship to build awareness and take up; of the Post Office voucher scheme letter, which will be distributed to the pensioner cohort and the households in emergency accommodation;</li> <li>- Discussions with the Adult Services Provider Forum and the Carers Network so that those people who work with and support some of our pensioner population can encourage them to use the vouchers.</li> </ul> </li> <li>• The Post Office also has the capacity to implement specific requirements such as having a different language,</li> </ul>	<ul style="list-style-type: none"> <li>• The Monthly data will be reported to the Council's Covid Silver Group and if necessary further demographic data will be sought to support the overall understanding of the impact of the scheme.</li> </ul>	<p>Sep 2022</p>	<p>Angelica Stoichkov</p>
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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### Include details in the space below

1. The Scheme may result in direct or indirect discrimination of those of pensionable age.
2. The Scheme will help to advance the equality of opportunity for groups who share relevant protected characteristics and those who do not by addressing inequalities around access to financial support for many groups in financial hardship.
3. The Scheme will help foster good relations between communities through the creation of financial support for those most in need.

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

Outcome 2

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here

See mitigations section as this refers to those on pensionable age.