

Cabinet Supplemental Agenda

Date: **Thursday 18 November 2021**

Agenda - Part I

KEY 17. Household Support Fund (Pages 3 - 50)

Report of the Corporate Director, Resources.

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Report for: Cabinet

Date of Meeting:	18 November 2021
Subject:	Household Support Fund
Key Decision:	Yes as it effects the whole Borough
Responsible Officer:	Charlie Stewart - Corporate Director, Resources
Portfolio Holder:	Cllr Natasha Proctor – Deputy Leader and Portfolio Holder for Finance & Resources
Exempt:	No
Decision subject to Call-in:	No - (waiver requested as allocation of funding is urgent to support vulnerable people as winter approaches, and only limited time is available to ensure all the fund is spent)
Wards affected:	All
Enclosures:	Appendix 1 - Household Support Fund Policy; Equality Impact Assessment

Section 1 – Summary and Recommendations

The Government announced in early October that a new Household Support Fund (HSF) grant would be made available to Councils to support those most in need this winter.

At least 50% of the total funding must be spent on families with children. In terms of type of support, the expectation is that the Household Support Fund should primarily be used to support households in the most need with food, energy and water bills. It can also be used to support households with essential costs related to those items and with wider essential costs. Administration costs may be charged against the grant.

Harrow Council will receive a total grant of £1,476,707.18 which must be spent by 31 March 2022.

Authorities were asked to have arrangements in place as quickly as possible to support vulnerable households throughout the grant period and our outline plan was submitted to the Department of Work and Pensions (DWP) on the 29th October as they requested. As winter would soon be upon us and costs of living are rising swiftly, quickly getting arrangements in place is important for Harrow's most vulnerable. Therefore this paper has been tabled urgently for the November Cabinet and a call-in waiver is requested.

The paper proposes how Harrow Council would spend the indicative Household Support Fund before 31 March 2022. Although it is expected that the grant allocation from DWP and plan would not change, if it does then it is proposed that changes to the scheme are agreed by the Corporate Director – Resources in consultation with the Cabinet Member for Finance & Resources. Additionally, if one part of the framework underspends, it is proposed that the funding be used to extend the support offered in another part of the framework and that delegation is made to the Corporate Director – Resources in consultation with the Cabinet Member for Finance & Resources to make these amendments.

Recommendations:

Cabinet is requested to:

1. Approve the allocation of the Household Support Fund as set out in this report and specifically the Council Tax Support (CTS) and Emergency Accommodation (EA) options as follows:
 - a. For CTS, the Working Age households option at £40 to be paid in one installment .
 - b. For EA, the Household with Children option at £36 per month for the time of the grant.
2. Approve the Household Support Fund Policy (set out at Appendix 1);
3. Delegate to the Corporate Director – Resources in consultation with the Cabinet Member for Finance & Resources the authority to make

minor changes to the scheme and to manage the small reserve of £32,399.78;

4. Approve the purchase of vouchers for elements identified in this report relating to Council Tax Support, Emergency Accommodation and the Emergency Support Scheme, through a compliant procurement route; and
5. Delegate to the Corporate Director Resources in consultation with the Cabinet Member for Finance & Resources to firstly, finalise and make decisions on any issues pertaining to the HSF and secondly, delegate the authority to make the award of contract for the purchase of the vouchers that the Council will directly administer.

Reason: (for recommendations)

The recommendations in this report meet the criteria for the grant as set out by DWP. Those criteria provide broad discretion with a focus for 50% of the scheme on families with children. The Council have considered from the limited data available where best to focus the funding. The proposals provides a balance of a spectrum of support together with focus so that the funding is not spread too thinly. The proposal eligibility criteria cover the following:

- Free school meals and Council tax support which have historically been found to provide effective support to vulnerable families;
- Harrow's Community Hub support. This is a joint venture with the community and voluntary sector, which has shown to be effective in providing essential food support quickly to vulnerable residents;
- Emergency accommodation and general support is considered essential to help stop vulnerable people spiraling into acute difficulties following a critical one-off event; and
- Administration support which includes enlisting the aid of Citizens Advice Harrow (CAH) to act as the main referral route into the emergency support scheme. CAH know the history of the household and can screen clients for eligibility before referring on to the Council.

Section 2 – Report

Introductory paragraph

Harrow has been allocated a grant of £1,476,707.18 from the Department of Work and Pensions (DWP) to deliver a Household Support Fund, and the Council was required to provide a plan to DWP by the 29th October. The expectation is that the grant level and the plan as submitted will not change. However, if it does this would either be reported at the Cabinet meeting or it is proposed that delegation to make changes to the proposed scheme is granted to the Corporate Director – Resources in consultation with the Cabinet Member for Finance and Resources.

The grant has to be spent by 31st March 2022 and time is short to ensure it is distributed as quickly as possible. As winter would soon be upon us and costs of living are rising swiftly, quickly getting arrangements in place is important for Harrow's most vulnerable. Therefore this paper has been produced urgently for the November Cabinet.

DWP have provided the following guidance which sets the framework within which the fund must be delivered. The Council has discretion on the local Household Support Fund scheme with some fixed elements set by DWP:

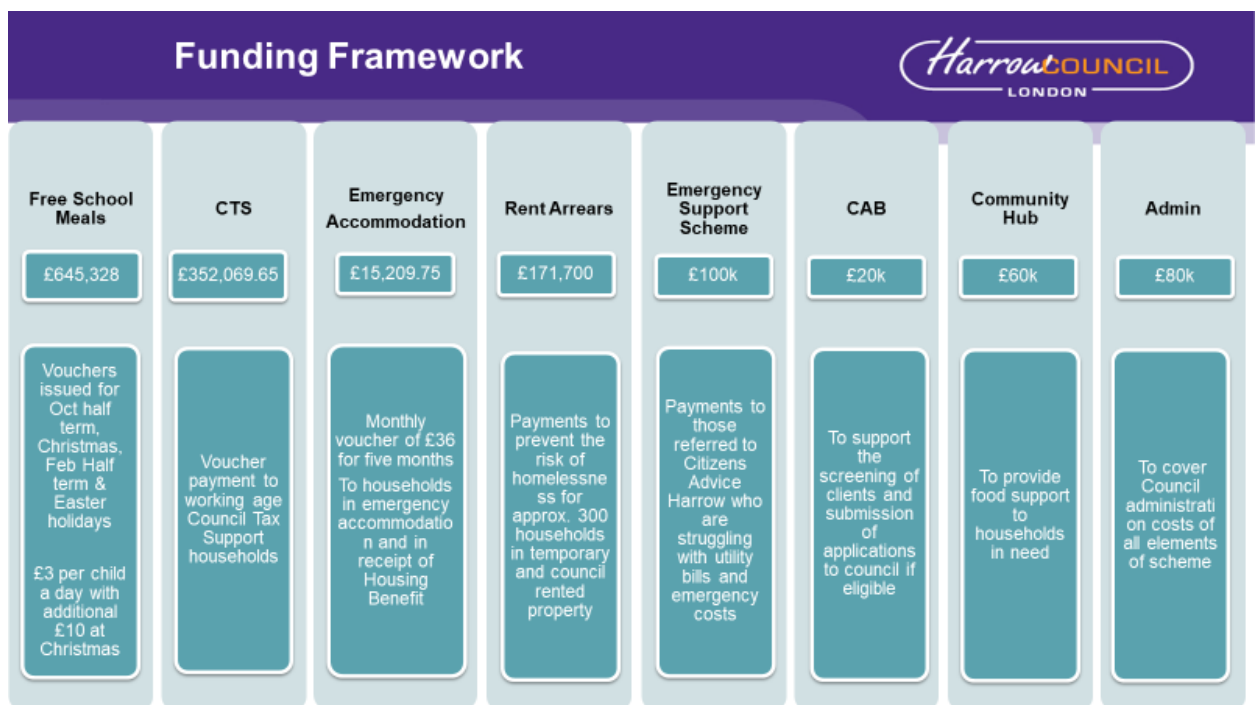
- It should primarily be used for vulnerable households most in need with food, energy fuel and water bills.
- It may also be used for other essential costs and in exceptional circumstances, it can be used to support housing costs or for financial advice
- DWP have urged Councils to include a claim based element to their scheme to act as a safety net for anyone with an immediate need who is not captured by other elements of the scheme
- It must not duplicate existing provision
- 50% of the funding must be allocated to households with children
- The Council must have spent all of the funding by 31 March 2022
- Any unspent funding must be returned to DWP
- Funding is ring-fenced for the purpose of the Household Support Fund
- Reasonable admin costs can be taken from the funding pot
- Funding cannot be used for mortgage costs or for advice services such as debt advice.

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 scheme provides a balance of these approaches. 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.

The Council's options were also limited by the available data, for example information for Universal Credit recipients is not available to permit a bulk mailshot.

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 31 March 2022 with the allocations spread largely as below.



More detail about each of these elements is set out below. If these allocations are agreed, then there is a reserve of £32,399.78 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 delegate to the Corporate Director – Resources in consultation with the Cabinet Member for Finance & Resources .

Households may qualify for multiple payments under different elements of the scheme. There is no restriction on the number of awards a household could receive, but consideration would be given to the level of assistance already received and whether any further award(s) would make a material difference to the household.

Free School Meals

Under the Covid Local Support Grant the Council has provided free school meals (FSM) to households during the holidays from October 2020 through to Summer 2021. This has been found to be effective as schools already have voucher systems set up for those parents with children on free school meals so the Council funding schools to make this offer to parents is a very efficient and effective way of giving financial support for families who's children qualify for free school meals. While the Household Support Fund is a new initiative, the Council is seeking to continue to deliver this support from October half-term through to the Easter holidays.

An award of £3/day per child is proposed to be issued via schools, with an additional £10 at Christmas. Any surplus funds not committed to be spent by 31 March 2022 across the whole scheme would then be used to top up the Easter holiday free school meal award to ensure the grant is fully spent. If the

funding for the Easter holidays is paid before 31 March 2022, recipients of vouchers can have a period of time to spend the money in April 2022, which is consistent with the grant conditions for the Council to have spent the funds by the 31st March 2022.

Council Tax Support

It is proposed to support households who are in receipt of Council Tax Support. Due to the Covid-19 pandemic the number of households on Council Tax Support increased by 19% since April 2020, or 36% for working age. Receipt of Council Tax Support is an indicator of low income and these households are therefore likely to be experiencing financial hardship as the cost of living increases, particularly for those who may have higher outgoings as they were employed prior to Covid. These households are also known to have the pressure of paying Council Tax in addition to other household expenses. The options set out in the table below were considered. The table shows the range of values that could be awarded depending on how many households are in the cohort.

Cohort	Number of CTS households	Value of monthly allocation per household based on circa £500k allocation
All CTS households	13,398	£7.50
Of which Working age	8,661	£8.00
Of which Household with children	5,030	£20.00

Pensioners were not considered for an award as a separate cohort as they already receive the Winter Fuel Payment. A disproportionately high number of working age are also new Council Tax Support claimants due to Covid and therefore are more likely to have greater financial pressures as their outgoings have previously been dependent upon them being in employment and not needing to rely on Benefits.

The working age option is recommended as it is a balance between giving a higher value award to fewer households or a lower value award to more households. It also balances with the proposal below to provide Emergency Accommodation support to households with children which is more focused.

Last year's Christmas' FSM allowance included a £10 Christmas addition. It is proposed to repeat this approach in this framework to ensure that the focus of the funding is on low income households with children. To cater for this cost within the funding allocation, the Council Tax Support element will be a one off payment of £40 (equivalent of £8 per month). However, such a one-off payment would benefit households as it provides an immediate larger sum than the alternative of a monthly payment.

A one off payment, rather than five monthly instalments which was originally considered, also reduces the postage costs which means more of the total funding can be given to residents, and is anticipated to be of greater impact to the recipients than if the payment was made in instalments.

Vouchers would be posted to recipients and could be redeemed in supermarkets. This would assist households with their food shopping if they are struggling to afford food or would free up money that would otherwise have been spent on food for use on other essentials such as energy fuel (gas/electric) or water.

Emergency Accommodation

Households with children in emergency accommodation and in receipt of Housing Benefit are proposed to be given an award of £36 a month. As per the table below, the option to give a lower value award to all households in Emergency Accommodation and on Housing Benefit was considered, but it is recommended to give a higher rate to households with children to make a material difference to these households.

The awards will be issued as a voucher once a month for five months, November 2021 to March 2022. As with the Council Tax Support allocation, the voucher can be redeemed at supermarkets and will assist with food and potentially free up money for the household to use for other essential items.

Cohort	Number of Emergency Accommodation households in receipt of Housing Benefit	Value of monthly allocation per household
All EA households	149	£20.00
Household with children	83	£36.00

The number of households is based on the Housing Benefit caseload as of October 2021. This would fluctuate at the point each monthly award is issued. While the intention is to keep the award at £36 a month, the final payment in March may differ depending on the level of remaining funding available.

Rent Arrears

As per DWP guidance, in exceptional circumstances the Household Support Fund can be used for household costs including rent arrears. 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.

It is proposed that the following funding would be allocated to a total of 281 households to assist with rent arrears:

- 77 households currently at risk of homelessness from temporary accommodation
 - Average cost of £1,700 per household.
 - Total £130,900
- 204 households at risk of homelessness from council rented accommodation
 - Average cost of £200 per household.
 - Total of £40,800

This would therefore be a total of £171,700 for this part of the scheme.

Emergency Support Scheme

DWP require Household Support Fund schemes to have an element that residents can access via an application process. The intention is to be a safety net for vulnerable households in need who either haven't received assistance through other elements of the scheme or who still can't afford essential items after receiving assistance.

Food, gas, electricity and water would be prioritised by the proposed Emergency Support Scheme, particularly where there is good reason why the household is unable to receive assistance with food from the Community Hub. The scheme would also consider applications for items associated with these essential items such as boiler repair. To maximise the impact of the fund for as many residents as possible, awards would only be made where there is no alternative provision available for the required item. Applications for items such as clothing, school uniform and furniture or white goods would also be considered.

The type of things a successful applicant would need to demonstrate are:

- why the item they are applying for is deemed to be essential;
- how an award would make a material difference to the household, for example there is no gain in arrears of a gas bill being cleared if they would immediately start to accumulate again; and
- what their financial situation is to show why they are unable to afford to purchase it themselves

As funds are limited, a decision to make an award would also take into account how else the funding could be used, for example a payment of £500 to one household for new furniture or five £100 payments to five households for gas credit on key meter.

A procedure will be developed to set out the criteria for the Emergency Relief Scheme to ensure consistency in approach. It is proposed that Citizens Advice Harrow (CAH) triage potential applicants and support them in submitting an application. Applications will then be reviewed by the Benefits service prior to a decision on whether or not the application is successful. Successful applications will also be approved by a Senior Officer before an award is issued. Both the Benefits Service and CAH propose to use a small pool of staff to process the applications which will also ensure a higher level of consistency.

Across all elements of the Household Support Fund, residents would be advised on what advice is available in the borough to assist them to be financially stable, for example referrals to SHINE to assist with energy efficiency.

Awards would be made through the most appropriate of the following channels:

- Instant Issue Payment card – with ATM service if appropriate;
- BACS;
- Provision of item such as furniture/white goods; or
- Direct payment to third party such as to gas provider for arrears payment.

Citizens Advice Harrow

It is proposed that Citizens Advice Harrow (CAH) triage applicants to the Emergency Support Scheme and where appropriate assist residents in completing applications for referral to the Council's Benefits Service. CAH are well placed to receive referrals and to know who from their own client base could potentially qualify for a payment.

CAH are also delivering a debt advice service which can take referrals from the scheme to give longer term assistance to residents applying to the scheme. Furthermore, they hold a wealth of information about other funding available to residents which would ensure that not only can residents access as much assistance as they may be entitled to, but also that the Emergency

Support Scheme funding would have greater impact as it would only be used where no other provision is available.

The Council's Benefits service would make the final decision on all applications and issue awards. CAH and the Benefits service already have a good working relationship, which would assist in the quick set up of this new process.

Community Hub

It is proposed that as the Community Hub are already in receipt of additional monies from the Council, having been extended until the 30th September 2022, that £60,000 of the Household Support Fund is used to free up that sum of the the originally agreed funding from other Council budgets, which will help the Council manage other pressures. This provision has been found to be very effective in providing food and other support to a wide range of vulnerable residents.

As well as being a priority item in the DWP Household Support Fund guidance, it is known that food is frequently what households present as not being able to afford as they have used money on other essential items. It is also proposed that where a household may have a different need, provision of food may free up money to be used by the household on other items.

Administration

DWP have allowed Councils to use a reasonable amount of the Household Support Fund to pay for administration of the scheme. It is proposed that the Council retain £80k of the funding for the following admin roles and £20k be paid to Citizens Advice Harrow for their administration:

- Team Leader in Benefits Service
- Senior Assessment Officer
- Housing Support for rent arrears
- Business Support to administer vouchers

Ward Councillors' comments

Not Applicable

Performance Issues

Each of the strands of support will be monitored and pulled together into a report that will be considered monthly by the Council's Covid Silver Group, which is chaired by the Corporate Director – Resources.

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 into account when agreeing the recommendations in this report:

Risk Description	Mitigations	RAG Status
Risk of more applicants being in the system resulting in overspend	<ul style="list-style-type: none">▪ FSM – £80k had previously been committed to FSM from the public health reserve. This pot will be retained to cover any FSM overspend due to an increase in the number of children receiving FSM over the course of the HSF scheme▪ Emergency Accommodation – this is a relatively low number of households so low financial impact if number rises▪ Council Tax Support – is a one off payment so no risk in respect of a rising caseload▪ Other elements of the scheme – funding is limited to the amount allocated so any increase in demand will not be met	Amber

Risk Description	Mitigations	RAG Status
	<ul style="list-style-type: none"> ▪ The proposal includes a reserve of £32,399.78 which will be used to top up any elements where demand is higher than forecast 	
Risk of funding not being spent	<ul style="list-style-type: none"> ▪ 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 ▪ Publicity will be undertaken to raise awareness, in particular with partners who are well placed to signpost residents to access the scheme ▪ Any unspent funds will be used to increase the FSM allocation for the Easter holidays 	Green
<p>Full funding not received as a result of DWP determining that spend was not eligible</p> <p>(DWP funding will be made in arrears in two instalments following MI returns from the LA. The first is an interim payment in Feb/Mar 2022 and the second a final payment in May/June 2022. The second will be dependent on DWP being satisfied that the LA's MI submission evidences eligible spend within the scheme)</p>	<ul style="list-style-type: none"> ▪ Harrow's approach takes full account of DWP guidance on spend to ensure its scheme is within the framework ▪ 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 Jan 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 ▪ There is flexibility within the scheme to adapt it should it be necessary to make changes to the allocation of funding across the different 	Amber

Risk Description	Mitigations	RAG Status
	elements once DWP feedback	
The focus of funding is inappropriate and options limited as it is based on limited data.	<ul style="list-style-type: none"> ▪ Regular review of allocations and spend to ensure update is appropriate. ▪ Level of funding allocated to different strands of the scheme can be adjusted to ensure scheme remains within funding allocation 	Green
Funds duplicate existing provision	<ul style="list-style-type: none"> ▪ Regular review of allocations against outcomes predicted from other grants to ensure there is no or limited overlap. 	Green
50% of the funding is not allocated to households with children	<ul style="list-style-type: none"> ▪ The value of spend on households with children who qualify for FSM, are working age in receipt of Council Tax Support and Emergency Accommodation households on Housing Benefit is expected to be at least £865,000. 50% of the grant is £738,353.59. The risk of not meeting the 50% target for spend on households with children is therefore low. However, this will be monitored through the running of the scheme and spending of funds on rent arrears and from the Emergency Support Scheme will be directed to children if the target is at risk of not being met 	Green
Inconsistent decisions being made on support provided via <u>Emergency Support Scheme</u>	<ul style="list-style-type: none"> ▪ Criteria set out in procedure will give a framework to CAH and LBH Benefits Service to increase consistency in decision making 	Amber

Risk Description	Mitigations	RAG Status
	<ul style="list-style-type: none"> ▪ Small pool of decision-makers both in CAH and LBH Benefits Service will provide greater consistency ▪ Applications to be approved by a Senior Officer to the original decision maker which will further ensure that decisions are within the criteria 	
The scheme will have an adverse impact of people of a pensionable age	<ul style="list-style-type: none"> ▪ Mitigations are detailed in the attached EIA 	Amber

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 £60,000 of the Household Support Grant to substitute already agreed expenditure, there are no further procurement implications for this spend.

For Citizens Advice, as our commissioned generalist information and advice provider they are the natural partner to support the screening of those individuals and families who would qualify for our emergency support scheme or who have rent arrears. Therefore, as Citizens Advice are the only organisation that could holistically offer this service to Harrow residents the £20,000 spend to support their contribution to the Household Support Fund can be delivered through a variation of the existing contract to incorporate the new scope.

The Council will purchase vouchers for elements identified in this report relating to Council Tax Support, Emergency Accommodation and the Emergency Support Scheme, using a compliant procurement route.

Legal Implications

The DWP has provided funding to local authorities under s.31 of the Local Government Act 2003. The DWP has issued guidance on the administration of the scheme, which has been considered in formulating the Council's policy. There are also requirements in relation to information sharing and submitting monitoring returns on use of the funds. The policy contains provisions in relation to combatting fraud to ensure that monies can be recovered and action taken if any applications are submitted on a fraudulent basis.

The guidance explains that: *“the funding is intended to benefit households most in need of support with food, energy bills, related essentials,*

wider essentials and (exceptionally) housing costs as the economy recovers this winter. The funds should not be used for any economic undertaking. Whichever way you use the funding, including where you work in partnership with others, you should consider all Subsidy rules (previously state aid) issues. Check whether the 'de minimis' regulation exception applies. You should also follow government procurement procedures where relevant."

Financial Implications

The eligibility criteria and associated framework outlined in this paper is in line with the grant determination letter and guidance from DWP.

The grant allocation is considered that it is unlikely to change. If it does then the scheme will need to be altered to fit within the final allocation. Recommendations on how this will be done are indicated in the paper.

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. The equalities impact will be revisited on each of the proposals as they are developed. Consideration of the duties should precede the decision. 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:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- 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:
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - 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;

- 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:
 - Tackle prejudice, and
 - 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 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 residents of working age who have a disability and are in receipt of Council Tax Support;
- There is likely to be a positive impact on pregnancy and maternity
- There will be a positive impact on those residents of working age who are of a Black and Multi Ethnic heritage; and
- There will be a positive impact on women.

The appended Equality Impact Assessment highlights the following adverse implication:

- There will be an adverse impact on those people of pensionable age

Mitigations are set out in the Equality Impact Assessment.

Council Priorities

The decision has a direct bearing on the Council's commitment to tackling poverty and inequality and addressing health and social care inequality as it supports the most vulnerable in the Borough with critical funding to support them over the winter months. Through these financial payments their health will be supported through helping ensure they continue to have a place to live and have support towards other costs such as food and heating.

Section 3 - Statutory Officer Clearance

Statutory Officer: Dawn Calvert

Signed by the Chief Financial Officer

Date: 10/11/2021

Statutory Officer: Jessica Farmer

Signed on behalf of the Monitoring Officer

Date: 10/11/2021

Chief Officer: Charlie Stewart

Signed by the Corporate Director

Date: 10/11/2021

Head of Procurement: Nimesh Mehta

Signed by the Head of Procurement

Date: 10/11/2021

Head of Internal Audit: Susan Dixon

Signed by the Head of Internal Audit

Date: 10/11/2021

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: Alex Dewsnap – Director of Strategy and Partnerships,
alex.dewsnap@harrow.gov.uk

Background Papers: None

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

YES

Household Support Fund Policy

Introduction

On 30 September 2021, the Department for Work and Pensions (“DWP”) announced £500m of new funding for authorities across England, Scotland, Wales and Northern Ireland to distribute to vulnerable households over winter. This is known as the Household Support Fund (“the Grant”).

The paper presented to Cabinet in November 2021 provide 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 is £1,476,707.18.

Eligibility Criteria

The Grant is limited to awards and applications covering the funding period from 6 October 2021 to 31 March 2022. Funds must have been spent or committed before 31 March 2022 and cannot be used for future commitments.

Applications must be made by a household 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
Households with Children	At least 50% of the total funding must be spent on families with children. These households do not have be in receipt of DWP welfare benefits	<p>This means a household with:</p> <ol style="list-style-type: none"> 1) a person who will be under the age of 19 as at 31st March 2022, <u>or</u> 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.
Essential Living Costs	The HSF should primarily be used to support households in most need with eligible spend for essential living costs	<p>These costs should include:</p> <ol style="list-style-type: none"> 3) Food. 4) Energy for domestic heating, cooking or lighting, including oil or portable gas cylinders. 5) Water bills for drinking, washing, cooking, and sanitary purposes and sewerage. 6) Essentials 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: <ol style="list-style-type: none"> i. Sanitary products ii. Warm clothing iii. Soap, iv. Blankets v. Boiler service/repair, vi. Purchase of equipment including fridges, freezers, ovens, etc.
Associated Living Costs	The HSF can also be used to support households with certain other essential costs	<ol style="list-style-type: none"> 7) Wider essential costs not linked to energy and water. These may include, but are not limited to: <ol style="list-style-type: none"> i. Support with other bills including broadband or phone bills, ii. Other clothing iii. Other furniture such as mattress iv. Essential transport-related costs such as repairing a car, buying a bicycle or paying for fuel. v. Council Tax arrears

Other	The HSF can be used for other means of support not covered by the above	<p>8) Housing costs, 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 mortgage payments.</p> <p>9) Support to individuals with No Recourse to Public Funds (NRPF), 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"> i. there are community care needs ii. they have serious health problems iii. there is a risk to a child's wellbeing
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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	Estimated No of Children		Provisional Allocation of Funding (£)
Families with Children in receipt of Free School Meals (FSM):	Estimated No of Children		
October 2021 Half-Term (5 days)	6088	£3 per day per child	£91,320
Christmas 2021(11 days)	6088	£3 per day per child plus additional £10 for Christmas	£261,784
February 2022 Half-Term (5 days)	6088	£3 per day per child	£91,320
End of March 2022 (11 days)	6088	£3 per day per child	£200,904
	Estimated No of Households	Proposed Funding per Household	Provisional Allocation of Funding (£)
Working age families with Children in receipt of Council Tax Support – one off payment	5030	£40 + postage	£204,469.50
Households with Children in Emergency Accommodation and in receipt of Housing Benefit – five monthly payments from Nov 2021 to Mar 2022	83	£180 + postage	£15,209.75
Total			£ 865,007.25

It is forecast that the above approach will exceed the 50% funding reserved for households with children. In addition, households in the borough both with and without children can apply for support funded by £352,100 either from the Community Hub or the Emergency Support Scheme.

Funding for households without children

Category	Estimated No of Households	Proposed Funding per Household	Provisional Allocation of Funding (£)
Working Age households without children in receipt of Council Tax Support – one off payment	3631	£40 + postage	£147,600.15

Awards to households with or without children either in lieu of free school meals during school holidays, to Council Tax Support households and to households with children in emergency accommodation in receipt of Housing Benefits will be made in the form of a voucher. Vouchers can be redeemed at supermarkets, assisting the household with the cost of food. It is anticipated that this approach will either help ease the financial pressure of purchasing food directly, or free up funds within the household that would otherwise have been spent on food to use on other essential items such as gas, electric or water costs.

Funding for households with and without children

Community Hub

£60k of funding will be allocated to the Community Hub to support provision of food parcels to Harrow residents. Households 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 the Community Hub. The number of awards are 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.

Emergency Support Scheme

Funding of £271,700 will be allocated to an Emergency Support Scheme which residents can apply to. Potential applicants will be triaged by Citizens Advice Harrow, and where appropriate an application form submitted with support from Citizens Advice for assessment by the Council.

The scheme will potentially assist with any essential item set out in Table 1. Provision will be in kind, voucher, payment card with or without ATM use, BACS payment or direct payment to third party e.g. landlord for rent arrears or energy fuel provider.

Awards will normally be limited to £100 per household for smaller items such as food, energy fuel and clothing, and £500 for furniture and white goods.

Eligibility will be assessed by the household's ability to fund the essential item based on their available income and capital. Consideration will be given to whether the award will make a material difference to the household, e.g. if gas arrears are cleared can the household afford to sustain payments in future.

£171,700 of the Emergency Support Scheme funding is allocated to rent arrears. Support with rent arrears is only eligible where no other provision is available including Housing Benefit, Universal Credit or Discretionary Housing Payments. Rent arrears may be through application from the household via Citizens Advice, or through proactive action by the Council's Housing Department.

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

The funding allocations will be reviewed on a monthly basis and adjusted to prioritise awards for free school meals, to households with children in emergency accommodation on Housing Benefit and Council Tax Support households.

Reserve

£32,399.78 will be held in reserve to top up any of the funding pots should demand be higher than forecast. Any potential underspend will be allocated to free school meals for the Easter payment in advance of the 31 March 2022 grant deadline.

Non-eligible spend

Eligible spend does not include the following:

- Advice services such as debt advice
- Mortgage costs.

Backdating

Applications will be accepted for funding that has already been occurred, subject to the application being made with 28 days of the commitment (56 days where the funding relates to a commitment from 6 to 31 October 2021). The funding period must fall within the period 6 October 2021 to 31 March 2022. All applications must be received by 18 March 2022 to ensure awards are made prior to 31 March 2022.

Multiple Claims

Households may receive awards from multiple elements of the Household Support Fund. Repeat applications to the Emergency Support Scheme will consider how any previous awards have been used by the household.

Third-party applications

Applicants can apply on behalf of someone else, however the funding must be provided to a bank account in the name of the person for whom the application is being made. In exceptional circumstances awards will be made to third parties if the award is made toward arrears of rent, energy fuel or water. Funding can be provided to third party organisations to distribute on the basis the organisation administers the Grant in accordance with this policy and contracts to provide monitoring information to the Council.

Third party organisations are limited to the following:

- Registered charities and voluntary organisations
- Schools
- Food banks
- General Practitioners
- Care organisations

Application Process

Applications for Emergency Support will be made through CAB.

Determination of applications

Applications to the Emergency Support Scheme will be administered by the Benefits Service upon receipt from Citizens Advice Harrow.. The Housing Department will administer applications for assistance with rent arrears. Awards will be approved and made by a Senior Assessor at G7 grade or above who has not been involved in the decision making process.

Appeals

The applicant may request a review of a decision by writing to Harrow Council setting out the reason they think the decision is incorrect. The decision will be reviewed by an officer more senior than the original decision maker. The decision will be communicated to the application within one month or as soon as is reasonably practicable. This decision is final.

Complaints

Any complaints made in reference to the Household Support Fund will be considered under the Council's Corporate Complaints Policy.

Policy review

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

Combatting fraud

In order to ensure that applications for funding are not subject to abuse, all submitted applications will require a statutory declaration of truth, a statement regarding data processing and a recovery of funds statement. This declaration allows for the Council, through its corporate anti-fraud team, to carry out post payment checks in order to give greater assurance that the funds were claimed correctly. The declaration will carry a warning that allows the Council to consider taking criminal action against persons who have been found to have deliberately made false applications for the funding. It also allows for the recovery of funds which have been paid based on false or inaccurate information.

All awards will be made within existing compliance procedures and policies that apply to the Council's financial systems.

Verification

Verification of the household's circumstances will be required to verify the application. This will include proof of identity and national insurance number for any awards made using a Payment Card. A bank statement showing name, address, account number and sort code will be required for awards via BACS.

The award

It is intended that all applications will be processed within five working days of receipt of all required evidence. Payments will be made in-kind, by voucher, by payment card with or without ATM use, via BACS or as a direct payment to landlord or energy fuel/water provider. Successful applicants should expect to receive the funds within seven working days of the fully completed application. Where a payment card is awarded the applicant will be required to sign a Cardholder Agreement to confirm they understand the undertaking of using the card.

As funding is limited, any award will be on a first come first served basis. The Council cannot commit to further funding applications once all available funding has been allocated.

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Appendix 2

Equality Impact Assessment (EqIA) November 2021



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	Household Support Fund	Date EqIA created November 2021
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 04/11/21

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?

The Government have made available a Household Support Fund to Local authorities to support households (individuals and families) between now and the end of March. This is broadly to help individuals and families (at least 50% of which must have children) with household costs such as heating, food and other utilities. Given the need to move quickly with support ahead of winter the Council has developed its proposals rapidly to offer a set of financial support across a range of families, including those on free school meals, in receipt of Council Tax Support and those in need of Food support. Specifically, the proposal is as follows:

Funding Framework							
							
Free School Meals	CTS	Emergency Accommodation	Rent Arrears	Emergency Support Scheme	CAB	Community Hub	Admin
£645,328	£352,069.65	£15,209.75	£171,700	£100k	£20k	£60k	£80k
Vouchers issued for Oct half term, Christmas, Feb Half term & Easter holidays £3 per child a day with additional £10 at Christmas	Voucher payment to working age Council Tax Support households	Monthly voucher of £36 for five months To households in emergency accommodation and in receipt of Housing Benefit	Payments to prevent the risk of homelessness for approx. 300 households in temporary and council rented property	Payments to those referred to Citizens Advice Harrow who are struggling with utility bills and emergency costs	To support the screening of clients and submission of applications to council if eligible	To provide food support to households in need	To cover Council administration costs of all elements of scheme

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

Based on the data available we do not anticipate that the delivery of the 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. The support has been directed at some groups and not others on the basis that for example elderly residents have other support available to them such as a winter fuel allowance see section 3 below.

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

- 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 March 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 March 2022.

2. Assessing impact		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			
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , 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 each 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.		Positive impact	Negative impact		No impact
Protected characteristic	For each 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.		Minor	Major	
Age	<p>Harrow has a resident population of 251,160¹. 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 families².</p> <ul style="list-style-type: none"> 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 2030³. Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work⁴. 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%⁵. 	<input checked="" type="checkbox"/> Under pensionable age	<input checked="" type="checkbox"/> Over pensionable age	<input type="checkbox"/>	<input type="checkbox"/>

¹ Nomis 2019

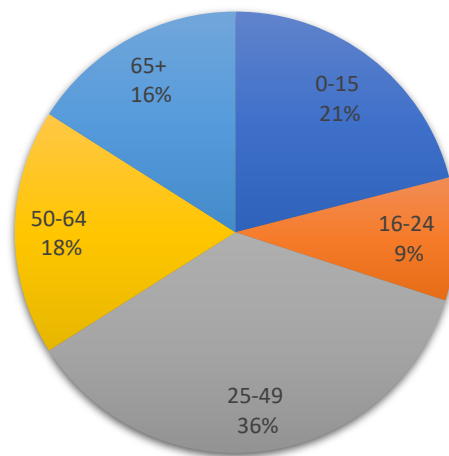
² ONS -2018 mid-year estimates

³ Poppi and Pansi projections to 2030

⁴ DWP Job claimant data April 2021

⁵ 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

	<p><u>Impact</u></p> <p>The Free school Meals 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).</p>				
<p>Disability</p>	<ul style="list-style-type: none"> • 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. <p>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.</p> <p>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.</p> <p>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</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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
Total	3695	9.9%	37261	4331	11.4%	37925	5728	15.0%	38186

Source: Spring School Census 2019, 2020 and 2021

Impact

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.

Gender reassignment

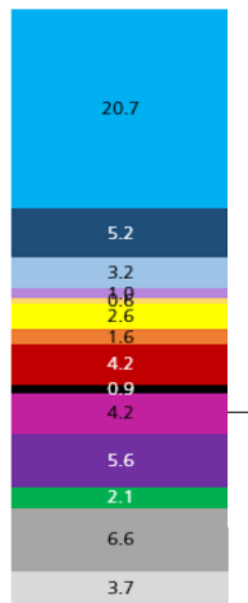
- There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.
- The charity GIREs estimated in their Home Office funded study in 2009 the number of transgender people in 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



	<p>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><u>Impact</u></p> <p>At this stage there is no way of concluding whether the Household Support Fund would have either a positive or negative impact on this group.</p>				
Marriage and Civil Partnership	<ul style="list-style-type: none"> 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. <p><u>Impact</u></p> <p>The Household Support Fund implementation will aim to support residents regardless of their partnership status.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy and Maternity	<ul style="list-style-type: none"> ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England & Wales average of 10.8 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><u>Impact</u></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 Household Support Fund implementation will aim to support residents regardless of their status. Given both the age range of adults and the number of families with children that will be positively impacted by the scheme, there is a higher likelihood that there is a positive impact on pregnancy and maternity, as some of the adults in families with children will either be pregnant or recently had children.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

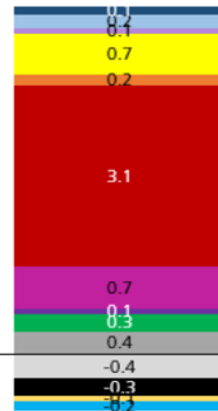
Race/
Ethnicity

% 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 growing⁶. 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.



⁶ 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).
- 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
Total	3695	9.9%	37261	4331	11.4%	37925	5728	15.0%	38186

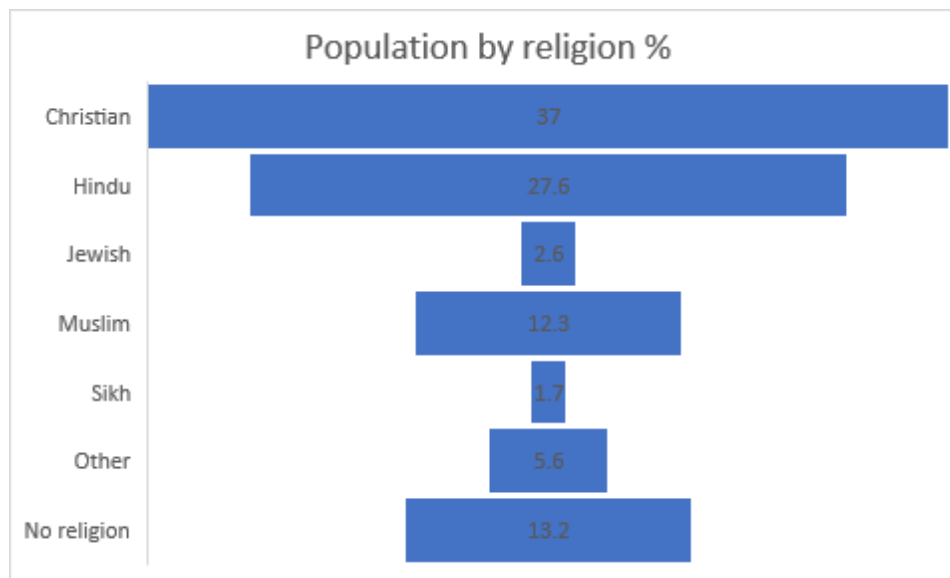
Source: Spring School Census 2019, 2020 and 2021

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%)
Total	204	77	281

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>				
Religion or belief	<ul style="list-style-type: none"> 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'. 	<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 change⁷.
- 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 borough⁸.

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.

⁷ Harrow Economic Assessment: 2019-2020:population

⁸ Annual Population Survey 2018.

Sex	<ul style="list-style-type: none">• 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.• Economic activity among Harrow’s male population is higher than the London average at 86%, compared with 83%⁹. 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 £760¹⁰ 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 £688¹¹.• 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:				

⁹ NOMIS: Labour supply (at December 2020)

¹⁰ NOMIS: earnings by place of work 2020

¹¹ NOMIS: earnings by place of work: 2020

	Total	204	77	281					
	<u>Impact</u> <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>								
Sexual Orientation	<ul style="list-style-type: none"> The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region¹². There is no official data on sexual orientation for Harrow in relation to employment. LGBT people are also likely to be underrepresented among business owners within Harrow. <u>Impact</u> <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 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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? <input checked="" type="checkbox"/> Yes, <input type="checkbox"/> 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 <ul style="list-style-type: none"> There will be a positive impact on those working age benefits recipients, and within those families with children. 									

¹² Trust for London: London's Poverty profile 2016.

- There will be a positive impact on those residents of working age who have a disability and are in receipt of CTS
- There is likely to be a positive impact on pregnancy and maternity
- There will be a positive impact on those residents of working age who are of a BAME heritage
- There will be a positive impact on women

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 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).

47

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 each 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	<ul style="list-style-type: none"> • Monitoring data will be developed as the scheme is rolled out and reported on a monthly basis 	<ul style="list-style-type: none"> • The Monthly data will be reported to the Council's Covid Silver Group and if necessary further demographic data will be sought to 	March 2022	Rachel Gapp

various elements of the scheme		support the overall understanding of the impact of the scheme.		
Those of pensionable age will not receive anything from the Scheme	<ul style="list-style-type: none"> The mitigations for this are that pensionable income is above benefit level income (Universal Credit) and that households in this age bracket also have access to other support such as the Winter Fuel Allowance (with fuel being one of the criteria for the support offered from the Household Support Fund). It is accepted however, that both of these, ie pensionable income and winter fuel allowance, are not Council delivered support. 	<ul style="list-style-type: none"> 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. 	March 2022	Rachel Gapp

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 EqlA 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 EqlA 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.

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