

DERBYSHIRE COUNTY COUNCIL

CABINET

14 January 2021

Report of the Executive Director of Children's Services

**URGENT DECISION TAKEN BY THE EXECUTIVE DIRECTOR
Children Services
Covid Winter Grant Scheme**

1 Purpose of Report

Cabinet is requested to note the urgent decision taken by the Executive Director of Children's Services on 2 December 2020 to approve spending plans for the Derbyshire County Council allocation of the COVID Winter Grant Scheme. The scheme was announced on 8th November 2020 but clarifying guidance was not received until 23rd November 2020 from the Department of Work and Pensions with a go live date from December 2020 and therefore time for the normal decision-making protocols have not been possible.

This is a dynamic initiative and since the Executive Director's Urgent Decision the children and adult cohorts have been further refined and more detail is provided within this Cabinet Report. Furthermore, the rationale for exclusion of eligibility is also provided with the report. Work has been ongoing to provide more information about the rationale of cohorts, in and out of scope, without changing the fundamental make-up of the cohort.

2 Information and Analysis

On 8th November 2020, the Government announced a package of extra targeted financial support for those in need over the winter period; further guidance was issued on 24th November 2020. The grant scheme will begin in December 2020 and complete by 31 March 2021. Derbyshire County Council's allocation is £2,181,024.15.

The Local Authority can determine eligibility in their area and target their support within the scope of the conditions set out below:

- at least 80% of the total funding will be ring-fenced to support families with children, with up to 20% of the total funding to other types of households, including individuals.

- at least 80% of the total funding will be ring-fenced to provide support with food, energy and water bills (including sewerage), with up to 20% on other items.

The option selected for children is below and shows the whole grant value, this will be paid over two periods: Christmas 2020 and Spring (February/March 2021).

Cohort	Eligibility	Numbers	Total Grant (families)
Families with Children	Free School Meal (FSM) (excluding universal), Early Years Pupil Premium with qualifying benefits Early Years 2-Year Old with qualifying benefits Care Leavers 16-18	25,896	1.66m

Qualifying Criteria

- For Free School Meals the child must attend an educational setting; and must be in receipt of one or more of the following qualifying benefits (in some cases this excludes Universal Free School Meals):
- For Early Years Pupil Premium, the child must be aged between 3-4 and the family must also be in receipt of free childcare and one or more of the following qualifying benefits:
- For Early Years 2-year old funding, the child must be aged 2 and be in receipt of free childcare and one or more of the qualifying benefits:
- For care leavers, they should have been in care for at least 13 weeks after they reach the age of 14 or have been in care for at least one day after reaching the age of 16. The additional qualifying benefits do not apply.
 - Income Support.
 - Income-based Job seekers Allowance.
 - Income related Employment and Support Allowance.
 - Support under Part 6 of the Immigration and Asylum Act 1999.
 - The Guaranteed element of State Pension Credit.
 - Child Tax Credit (provided you are not also entitled to Working Tax Credit) and have an annual gross income of no more than £16,190.
 - Working Tax Credit run-on, which is paid for 4 weeks after you stop qualifying for Working Tax Credit.
 - Universal Credit - your household income must be less than set threshold after tax not including any benefits you get.

The grant scheme is targeted to aid those vulnerable families with children and other vulnerable households throughout the winter period especially those experiencing additional economic hardship due to the pandemic. Not all Children in Need, on a Child Protection Plan or in receipt of Early Help meet the qualifying criteria. Those from disadvantaged backgrounds should be captured in the qualifying criteria above with the exception of those under 2-years old, those who are educated at home and those who's circumstances have changed very recently. Additionally, not all children on Universal Free School Meals (Key Stage 1) meet the qualifying criteria listed above. Should a family circumstances change they may be eligible under the next voucher provision. Families who are excluded from the scheme may benefit from other schemes and information is displayed on the Council's website for other sources of assistance during the winter period.

The remaining grant, in accordance with the scheme's intent and the Executive Director's Urgent Decision, is to be spent on vulnerable adults via a voucher issue for care-leavers or via a combination of other means of support. These will include an increase in Local Welfare Assistance utilising the Derbyshire Discretionary Fund and an uplift to the Derbyshire Healthy Homes Programme which will address, via referral, domestic infrastructure issues including boiler repair and heating system maintenance. Furthermore, grants will be provided to Third Party Organisations to target those less likely to access local welfare support. Specifically: an older adult hardship fund targeting over sixty five year olds via a grant through Age UK; and a grant to Derbyshire Carers Association ensuring that funding reaches a wide range of vulnerable adults and families who are dealing with the additional pressures of caring for those with long term health conditions, chronic illness, disabilities and learning difficulties.

3. Additional information

It has been established that other surrounding local authorities are supporting eligible children schooled in their area regardless of their home address; this is the same for Derbyshire County Council. Therefore, children who go to school in Derbyshire but live outside the County are included in this calculation in keeping with other Local Authority plans.

The Derbyshire scheme will be supporting individual children (eg.one voucher per child) within the family group as opposed to awarding the same grant to each family regardless of size.

4. Financial Considerations

Approximately £1.66m would be spent of the provision to families meeting local criteria of vulnerabilities and those families where children are in receipt

of free school meals due to low income of the household across the Christmas and February half-term breaks.

Approximately £0.42m would be spent on vulnerable adults partially through voucher scheme for care-leavers and via the other methods outlined in this report.

It is estimated that administrative costs for the distribution of the overall scheme will be in the region of £60-80k and provision is made within the terms of the grant for essential administrative costs. However, it is the intention of Derbyshire County Council to ensure that all of the grant directly reaches vulnerable members of the community, consequently the council will not take administrative costs from the grant unless there is remaining unused grant at the close of the scheme to prevent unused funds having to be returned or become unclaimed.

5. Legal Considerations

The Council's Constitution provides that "notwithstanding any other provision of the Constitution Strategic Directors shall have the power, after discussion, if practicable, with the Leader of the Council or the relevant Cabinet Member or Chair, to take such actions deemed to be necessary and expedient in matters requiring urgent consideration and which, because of the timescale involved, or the need to safeguard the interests of the County Council, cannot be dealt with by submission to the next following meeting of the Council, Cabinet, Cabinet Member or Committee."

6. Other Considerations

In preparing this report the relevance of the following factors has been considered:- human rights, equality of opportunity, health, environmental, transport, property, crime and disorder and social value considerations.

7. Background Papers

See attached Executive Director of Children's Services Urgent Decision.

8. Key Decision


Yes

9. Officer's Recommendation

That Cabinet notes the Urgent Decision taken by the Executive Director and the additional detail provided for the adult scheme within this report.

**Jane Parfremment
Executive Director
Children Services**

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CHILDREN'S SERVICES
EXECUTIVE DIRECTOR URGENT DECISION
COVID Winter Grant Scheme

Head of Service Submitting request	Isobel Fleming (Service Director – Commissioning and Transformation, Childrens Services)
Date of Submission	2 nd December 2020
Date submitted to Executive Director	Final version – 2 nd December 2020
Executive Director Decision	Approved
Executive Director Approval	Signed:  JANE PARFREMENT
Date of Executive Director Decision	2 nd December 2020

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DERBYSHIRE COUNTY COUNCIL

2nd December 2020

Report to the Strategic Director for Children's Services

The COVID Winter Grant Scheme

Purpose of the Report

1. The purpose of this report is to ask the Executive Director for an urgent decision to approve spending plans for the Derbyshire County Council allocation of the COVID Winter Grant Scheme. The scheme was announced in early November 2020 but clarifying guidance was not received until 23 November 2020 from Department of Work and Pensions with a go live date from 1st December 2020 and therefore time for the normal decision making protocols have not been possible.

Information

2. On 8th November 2020, the government announced a package of extra targeted financial support for those in need over the winter period; further guidance was issued on 23rd November 2020. The £170 million COVID Winter Grant Scheme, available from December 2020, will see new funding issued to County Councils and Unitary Authorities to support those most in need across England with the cost of food, energy and water bills and other associated costs. Derbyshire County Council's allocation is £2,181,024.15.

3. The Department for Work and Pensions (DWP) will provide funding to County Councils and Unitary Authorities, under section 31 of the Local Government Act 2003, who will administer the scheme and provide direct assistance to vulnerable households and families with children particularly affected by the pandemic. This will include some families who normally have access to Free School Meals during term time. County Councils and Unitary Authorities in England will have the ability to deliver the scheme through vouchers or grants. The Scheme will operate until the end of March 2021.

4. The Local Authority can determine eligibility in their area and target their support within the scope of the conditions set out below:

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

5. In Derbyshire it is proposed that:

- approximately £1.66m would be spent of the provision to families meeting local criteria of vulnerabilities and those families where children are in receipt of free school meals due to low income of the household across the Christmas and February half-term breaks.
- approximately £0.42m would be spent on vulnerable adults partially through voucher scheme for care-leavers and via Derbyshire Discretionary Fund to cover the Christmas and February half-term breaks but also on application throughout the term of the grant scheme.
- Approximately £0.1m would be set aside for administrative costs but would be reallocated as the scheme matured should this figure prove to be excessive.

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6. The precise figures for funding for families with children will be confirmed dependent on which option is deemed most appropriate. The values provided are the whole grant value; further consideration must be given over how many periods this will be paid over; the recommendation would be to meet Christmas 2020 and Half Term (February) 2021.

Options for grant distribution	Cohort	Eligibility	Numbers	Total Grant - families	Approximate Grant Value
1	Families with Children	FSM (excluding Universal) Identified family with vulnerability (CIN, CP, targeted support) Early years funding NB this list is not exhaustive	16,759	1.66m	£99 per household
2	Children		27,565	1.66m	£60 per child
3	Option 2 + Option 3	992 Children who attend school in Derbyshire but live outside Derbyshire	27,565 + 992 = 28,557	1.66m	£58 per child

7. Where eligible children go to school in Derbyshire but live outside the County, where eligibility may differ, there is a potential that children in need may not qualify for the grant due to their area of residence. It is proposed that these children are given consideration within the Derbyshire grant allocation at Option 3.

8. It is recommended that supporting the number of children within the family group (including those who school in Derbyshire but live outside) and awarding a proportional grant as opposed to awarding the same grant to each family regardless of size would meet with the schemes intent and provide the anticipated level impact and where it is needed most.

9. Detailed records of Grant allocation would be produced to ensure that the money is fairly and consistently targeted, to reduce the risks of any fraud and to account for the expenditure in line with the set criteria. Detailed records will be held on individual household allocations. It is proposed that £100,000 will initially be set aside for administration, although this can be refined and/or reallocated as appropriated.

Other Options Considered

10. Numerous other options were considered but it was felt they did not meet the requirements of the Grant's intent, lacked flexibility and were not dynamic enough to respond to emerging needs.

Reason for Recommendations

11. The recommendations support the conditions and purpose of the grant as set by government whilst meeting local priorities.

Statutory and Policy Implications

12. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance, finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Financial Implications

13. The Children & Families revenue budget will be adjusted to reflect this new ring-fenced

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grant and it will be monitored through the usual financial monitoring process and in line with the grant conditions. A summary of the grant allocation is in the table below:

	Food & Utilities	Other	Total
	£m	£m	£m
Vulnerable families with children (including FSM)	1.3	0.33	1.66
Vulnerable Adults	0.37	0.08	0.42
Administration			0.10
Total	80%	20%	2.18

Legal Considerations

14. The Council's Constitution provides that "notwithstanding any other provision of the Constitution Strategic Directors shall have the power, after discussion, if practicable, with the Leader of the Council or the relevant Cabinet Member or Chair, to take such actions deemed to be necessary and expedient in matters requiring urgent consideration and which, because of the timescale involved, or the need to safeguard the interests of the County Council, cannot be dealt with by submission to the next following meeting of the Council, Cabinet, Cabinet Member or Committee."

Background Papers and Published Documents

15. Covid Winter Grant Scheme at the Enclosure.

Key Decision

16. Yes.

Officer's Recommendation(s)

17. That the Executive Director:

- Approves the overarching Covid Winter Grant Scheme expenditure plan for Derbyshire County Council.
- Approves up to £0.100m administration costs from the Grant (any unused funds will go back to providing assistance to those cohorts most in need).
- Approves that number of children is the determining criterion for grant award not family.
- Approves that children not resident in Derbyshire but schooled in Derbyshire are assessed on a case-by-case basis to ensure their needs are met.
- Approves that Vulnerable Adults will be treated on a case by case basis.
- Approves that the grant for children will be paid in two instalments covering Christmas 2020 and Half Term 2021.

Dr Isobel Fleming
Service Director - Commissioning and Transformation
Childrens Services

Enclosures:

1. COVID Winter Grant Scheme: – Guidance for County Councils and Unitary Authorities.

COVID Winter Grant Scheme: – Guidance for County Councils and Unitary Authorities

Introduction

1. The £170 million COVID Winter Grant Scheme will be made available in early December 2020 to support those most in need across England with the cost of food, energy (heating, cooking, lighting), water bills (including sewerage) and other essentials.
2. The Department for Work and Pensions (DWP) will provide funding to County Councils and Unitary Authorities (including Metropolitan Councils and London Boroughs), under section 31 of the Local Government Act 2003, who will administer the scheme and provide assistance to vulnerable families with children and other vulnerable households, particularly affected by the pandemic. County Councils and Unitary Authorities in England have a statutory duty for childcare and have the ability to deliver the scheme through a variety of routes including issuing grants to third parties, providing vouchers to households or making direct provision of food, for example. County Councils are encouraged to work together with District Councils to provide support and ensure the funding meets its objectives. **Note: County Councils and Unitary Authorities will be referred to as ‘Authorities’ throughout the remainder of this guidance.**
3. This guidance sets out the required collaboration between DWP, Authorities, including their delivery partners, such as District Councils and charitable organisations, etc., to successfully meet the policy intentions within the agreed framework. It also provides any constraints that we need to work within and the distribution of funding and reporting arrangements.
4. The aim is to give vulnerable households peace of mind in the run up to Christmas and over the Winter months during the pandemic by helping those who need it to have food on the table and other essentials, so every child will be warm and well-fed this winter.
5. Authorities have the local ties and knowledge, making them best placed to identify and help those children, families and individuals most in need. It is important to stress that this covers a wide range of vulnerable households including children of pre-school age too. Targeting this money effectively will ease the burden faced by a wide range of vulnerable households across the country worrying about paying the next utility bill or the next food shop due to the pandemic.
6. Rather than focus on one specific vulnerable group Authorities should try and use the wide range of data and sources of information at their disposal to identify and provide support to a broad cross section of vulnerable households in their area. Authorities have access to a variety of different benefit information through DWP’s Searchlight portal which provides information on individual citizen’s entitlement to (and confirms receipt of) DWP welfare benefits. However, support is not restricted to vulnerable households in receipt of benefits. Therefore, Authorities should try, where possible, to use other sources of information to identify vulnerable households, such as, social workers, troubled families’ advisors and utility companies.
7. This guidance applies to Authorities in England only and should be read in conjunction with the COVID Winter Grant Scheme Determination issued with this guidance.

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8. The total amount of funding being allocated to this scheme is £170 million and is in addition to the wider Support Package for disadvantaged families and children, which includes:

- expansion of the Department for Education's Holiday Activities and Food programme;
- increasing the value of the Department for Health and Social Care's Healthy Start vouchers from £3.10 to £4.25 from April 2021; and
- £16m to fund local charities through well-established networks and provide immediate support to front-line food aid charities.

Objective and key principles

9. The objective of the COVID Winter Grant Scheme is to provide support to vulnerable households and families with children particularly affected by the pandemic throughout the winter period where alternative sources of assistance may be unavailable.

10. When administering this scheme, you are encouraged to adopt the following principles:

- use discretion on how to identify and support those most in need
- use the funding from December 2020 up to the end of March 2021 to meet immediate needs and help those who are struggling to afford food and utility bills (heating, cooking, lighting) and water for household purposes (including drinking, washing, cooking, central heating, sewerage and sanitary purposes), or other related essentials. This includes payments made, or committed to, by the Authority or any person acting on behalf of the Authority, from 1 December 2020 to 31 March 2021. For example, this would allow food vouchers issued before the end of the funding period to be redeemed in April 2021
- work together with District Councils including, where necessary and appropriate, other local services, such as social and care workers to help identify and support households within the scope of the scheme.

11. When deciding how to help people, you should consider:

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

Access to data

12. The COVID Winter Grant Scheme is being classified as Local Welfare Provision (LWP) and local authorities (LAs) who have signed and returned the relevant section (Annex C) of the DWP/LA Memorandum of Understanding (MoU) have legal permission to access DWP's Searchlight portal. This portal provides information on individual citizen's entitlement to (and confirms receipt of) DWP welfare benefits. Therefore, this data can be used to help Authorities identify those families and individuals to whom to target this support.

13. Staff accessing Searchlight will need to be registered with the Employee Authentication System (EAS). Further information on Searchlight can be found in the local authority Searchlight Training Pack available in the Searchlight folder on Glasscubes (the LA/DWP online collaboration tool). If your Authority needs to discuss access to

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Glasscubes, contact DWP at lawelfare.lasupport@dwp.gov.uk and we will arrange for this to be provided.

14. Authorities do not have permission for the purposes of this scheme to access the 'Income' data provided on Searchlight for the Test and Trace Support Payment Scheme.
15. Searchlight can only be used to verify a specific individual's DWP benefit information. Therefore, if an Authority identified a group of potential customers who may be eligible for the scheme from their own records, they can access Searchlight to verify each claimant's DWP benefit entitlement (although benefit entitlement is not a condition of support).
16. Authorities cannot use the DWP Universal Credit (UC) Local Council Tax Reduction data share for LWP. We are not able to facilitate any bespoke UC data share to support Authorities with this scheme.
17. Authorities also have access to their own non-DWP data to help identify vulnerable households who may be eligible for support under this scheme.

Working with other organisations

18. Authorities should develop a 'local eligibility framework and approach' to enable them to distribute grant funding that best supports vulnerable families and individuals. The focus is on the provision of food, energy, water and/or associated financial support to vulnerable households with children (see the definition of a child under paragraph 25) over the winter period. A proportion of funding (up to 20%) is also available for vulnerable households without children (including individuals) so that no vulnerable household is excluded.
19. Authorities have flexibility to develop a local delivery approach that best fits the scheme's objective. Where Authorities choose to work with multiple organisations to provide a local delivery network or where Authorities choose to engage with District Councils to deliver this grant on their behalf, detailed arrangements and funding should be available to those organisations no later than the end of November 2020 so that support for vulnerable children and families can be in place in the run up to Christmas and the winter months.
20. County Councils are encouraged to work collaboratively with District Councils and other organisations in their area who may come into contact with those households who are eligible and would benefit from this grant. Authorities that do not have the mechanisms in place to administer this grant are encouraged to consider whether District Councils are better placed to do so on their behalf. If Authorities decide to engage with District Councils in this way they are encouraged to do so as quickly as possible to ensure roles, responsibilities and effective arrangements are put in place to deliver the scheme promptly and efficiently. Where Authorities are working with Third Party Organisations (TPOs), this should be done on an objectively fair, transparent and non-discriminatory basis, having regard to the time available to deliver the scheme.
21. DWP Jobcentre Plus staff are being made aware of the scheme and will aim to connect with their local partners to raise awareness and support Authorities with the delivery of the scheme to ensure it is making a real difference at a local level.

Establishing eligibility

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

Funding overlap

24. Authorities should consider the household circumstances when making a decision to spend this grant. Households may be receiving other forms of support and this should be taken into account to avoid duplicating provision where possible. However, families receiving other forms of assistance are not excluded from receiving support through this grant. For example, a household may:
- have additional wider needs in terms of food
 - need support with provision for cooking, lighting, heating and/or water (including sewerage)

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- require other essential supplies

Definitions

25. For the purpose of this grant (and without prejudice to other schemes):

- The definition of a child is any person:
 - who will be under the age of 19 as at 31 March 2021; or
 - a person aged 19 or over in respect of whom a child-related benefit (for example, Child Benefit) is paid or free school meals are provided; or

26. Where an eligible child lives on his or her own, they are a household that includes a child covered in the 80% allocation for households with children.

27. Vulnerable households which include a person aged 19 to 25 with special educational needs and disability (SEND) and/or care leavers may still be eligible for grant support however that support falls within the 20% allocation to households without children.

28. The definition of energy includes any form of fuel that is used for the purpose of domestic heating, cooking and lighting, including oil and portable gas cylinders. There is no prescriptive definition of other essentials although these should be related to food, heating, lighting, cooking, water and sewerage needs. Authorities have discretion to assess what is reasonable to assist those experiencing or at risk of poverty during the Covid-19 pandemic. Illustrative examples include: a warm blanket or duvet, winter coat, heater, essential toiletries such as sanitary products. It is not intended to cover debt advice and general financial hardship support not linked to food, warmth and/or hygiene. Housing costs are expressly excluded.

29. Third party organisations may include but are not limited to:

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

Reporting requirements

30. Authorities are required to make two Statement of Grant Usage and management information (MI) returns – **see the Grant Determination**. There is an interim statement and return that covers the months of December 2020 and January 2021 and a final statement and return that covers the full period of the scheme from December 2020 to 31 March 2021. The deadlines for completing these returns are shown in the table below. Completed MI returns should be sent to lawelfare.pdt@dwp.gov.uk

31. Authorities should use the standard MI reporting template provided, which incorporates the Statement of Grant Usage. For the purpose of this section:

- **Grant allocation** – refers to the amount of grant allocated to a TPO to distribute to vulnerable households.

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- **Grant award or spent refers** to the amount provided or paid to vulnerable households under the remit of this grant.
- Please asterisk or highlight in the tables where estimates have been used instead of actuals.

Reporting period		Deadline for return
01/12/2020	31/01/2021	14/02/2021
01/12/2020	31/03/2021	21/04/2021

32. It is the responsibility of Authorities to provide the MI returns to DWP.
33. The reporting requirements for Authorities (including District Councils that may be asked to support the distribution of the grant in Shire County Councils) are different to the reporting requirements for TPOs for example, charitable or voluntary organisations.
34. The main difference between the reporting requirements for Authorities and TPOs relates to the level of detail regarding spend and volumes relating to:
- families with and without children; and
 - food, utility bills and other essentials
35. Where Authorities (including District Councils) issue awards directly to vulnerable households they should either obtain information at source or via information or data they have access to, to complete the split of spend and number of awards across the eligibility criteria, in other words, families with and without children and food, utility bills and other essentials. Where Authorities decide to deliver support to vulnerable households through TPOs they should use whatever information the TPO holds, or other available data, to estimate the level of spend and volume of awards across the eligibility criteria.
36. The different elements of the MI template are shown below together with guidance on how to complete them.

Table 1

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

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

Table 2

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

- **Total Amount provided to vulnerable households** – this is the total amount of the grant fund that has been paid/awarded to vulnerable households. It includes amounts paid by Authorities and by TPOs on behalf of Authorities. It should not include amounts allocated to TPOs that have not been spent during the reporting period.
- **Administration costs** – this includes reasonable costs incurred administering the scheme. These include for example:
 - staff costs
 - advertising and publicity to raise awareness of the scheme
 - web page design
 - printing application forms
 - small IT changes, for example, to facilitate MI production
- **Total Spend** – this is the total of the above. It is the amount that will be used to determine the final funding payment from DWP to cover the full cost of administering the grant in your area.

Table 3

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

39. Table 3 relates to grant spend and the estimated volume of awards made in relation to families with and without children. Rows 1 and 2 relate to grant awards made by Authorities (including District Councils) directly to vulnerable households, and rows 3 and 4 relate to grant awards to vulnerable households made by TPOs.

40. **Authority Spend (£s)** - this is the amount paid/awarded to vulnerable households within the eligibility criteria. Authorities should make every effort to gather information to establish whether a child resides in the household (including being the only member of the household) in order to complete the template as fully as possible. This information is important for DWP to report to Ministers and evaluate how successful the scheme has been in providing support to households with and without children.

41. Authorities should either gather information or check existing records they hold or have access to, to establish whether the household includes a child (as defined above) and complete columns a and b accordingly. Responsibility for MI reporting rests with Authorities. Where Shire Counties pass grant allocations to District Councils, District

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Councils should pass the information relating to columns a and b to the County Council/Unitary Authority to collate the information and send one collated template to DWP.

42. **Authority Volumes** - this is the number of individual/separate payments made to vulnerable households within the eligibility criteria. If multiple awards are made to the same household throughout the period of the scheme each award should be counted separately. For example, where an award is made to a household with multiple children it should be classed as a single award.
43. **TPO Estimated Spend and TPO Estimated Volumes** - we acknowledge that some TPOs, for example, charitable and voluntary organisations such as food banks, have limited or no access to household information and may not be in a position to provide this information to the same level of accuracy as Authorities. We are therefore asking Authorities and TPOs to estimate, to the best of their ability, the level of spend and the volume of awards across the different eligibility criteria in rows 3 and 4.
44. Authorities should list these TPOs in Table 5 together with the amount of grant allocation they have been provided. More guidance relating to Table 5 is included later in this section.

Table 4

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

45. Table 4 relates to grant spend and the estimated volume of awards made in relation to food, utility bills (in other words, household energy and water) and to other essentials. Rows 1 and 2 relate to grant awards made by Authorities (including District Councils) directly to vulnerable households, and rows 3 and 4 relates to grant awards to vulnerable households made by TPOs.
46. Authority Spend (£s) - this is the amount paid/awarded to vulnerable households in respect of food and utility bills or other essentials.
47. Rows 1 and 2 relate to awards/payments made directly to vulnerable households by Authorities including District Councils. It does not include grant funding spent by TPOs e.g. charitable and voluntary organisations. The value and volume of grant spent by TPOs should be captured in rows 3 and 4.
48. Authority Volumes - this is the number of individual/separate payments made to vulnerable households within the eligibility criteria. If multiple awards are made to the same household throughout the period of the scheme each award should be counted separately. There is no requirement to distinguish between awards for food and utility bills these are both included in the same category of spend.
49. **TPO Estimated Spend and TPO Estimated Volumes** - we acknowledge that some TPOs, for example, charitable and voluntary organisations have limited **MI** and may not be in a position to provide this information to the same level of accuracy as Authorities. We are therefore asking Authorities and TPOs to estimate, to the best of their ability, the level of spend and the volume of awards across the different eligibility criteria in rows 3 and 4.
50. **Total** - the total spend in Table 2 row a, Table 3 column c and Table 4 column c should add up to the same amount.
51. When allocating spend and the volume of awards across the eligibility criteria please follow the guidance below.

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52. Table 3 and Table 4 ask for spend and award volumes to be recorded against two sets of criteria. Therefore, the details of each award need to be recorded twice once against one set of criteria and then a second time against the other criteria. Shown below is a worked example of how the MI template should be completed.
53. The eligibility criteria set two separate categories of spend, both with (at least) 80% and 20% splits. This is because the categories of spend cover separate subjects. One relates to household composition and one relates to the type of support being provided, for example, food and utility bills or other essentials.
54. Authorities are asked to report and manage spend in relation to both these areas. For example, if a £100 award is made to a family with children for food, you would allocate £100 to the 'family and children' section in Table 3 and £100 to the 'food and utility bills' section in Table 4. You would also allocate one award in both these sections of Table 3 and Table 4.
55. Each award needs to be allocated twice – one allocation to each of the eligibility category tables so that when you report on the total spent on family composition and the total spent on the type of support, both eligibility criteria categories will total the amount you have paid. The total volume of awards in Table 3 and Table 4 should also be the same.

Additional guidance and examples when working with TPOs

56. Please include, where possible, an estimate of the amount of spend across the following categories:

- families with or without children, and
- food, utility bills, or other essentials.

57. Please estimate this to the best of your ability.

58. For example, if you have allocated:

- grant funding to a food bank to provide food to vulnerable people, establish the amount of that allocation the food bank has spent and enter the full amount spent under food and utility bills as you know that the grant allocation has been spent in respect of food, and estimate the split across families with and without children in accordance with Example 1 below.
- grant funding to a charity that specialises in providing vulnerable children with clothing, establish the amount of that allocation the charity has spent and enter the full amount spent in 'families with children' and the full amount of the grant spent in 'other essentials'. This is because you know that the purpose of the grant is for children and the nature of support is clothing which comes under other essentials. Update Table 5 to provide a more detailed description of 'other essentials' for this TPO in Table 5 column b, something along the lines of 'provision of blankets and warm clothing'.

59. The amount of MI available will vary considerably across each TPO. Please use whatever information is already available or reasonable to collect to be as accurate as possible, although we understand estimates may be provided. Please asterisk or highlight where estimates have been made.

60. Shown below are some examples of how to complete the template.

Example 1

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61. A food bank operates on an open basis where anyone can turn up and pick up food and supplies. This is not an award made directly to vulnerable families by an Authority. The cost is picked up by a TPO, for example, the food bank. The MI template should be completed as per guidance below.
62. The total value of grant spent and the volume of awards made by the charity or voluntary organisation providing the food bank should be entered in Table 3 and Table 4. The Authority or food bank provider will need to estimate the split between families with and without children to the best of their ability.
63. If the food bank provider captures this MI and you can make a more accurate estimate of the split between families with and without children, then you should do so. If not, calculate the split between families with and without children based on published data which estimates that 40% of food parcels issued by food banks are made to families with children.
64. Table 5 should contain the total grant allocated to the TPO.

Example 2

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

Table 5

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

66. Table 5 is a list of TPOs you have allocated grant funding, to distribute to vulnerable households on your behalf. Do note that this excludes District Councils. Please provide the amount of grant allocated to each TPO in Table 5 column a.
67. This section covers grant allocations **not** the amount of grant awards/spend TPOs have provided to vulnerable families.
68. Please name all the organisations you are working with in your area together with the value of the grant allocation for each organisation. Authorities should have a good idea what the grant allocations made to TPOs will be used for. Where the grant allocation is intended to cover support other than food or utility bills, in other words, the other essential category, please provide a more detailed description in Table 5 column b outlining the nature of that support.

DWP engagement

69. LA relationship managers from DWP's LA Partnership, Engagement and Delivery division will contact Authorities to provide support and gather information throughout the scheme. Examples where LA relationship managers will contact Authorities:

- no Single Point of Contact details have been provided
- the MI templates have not been completed and returned

70. They will also contact Authorities where further clarification is needed in respect of the information provided on the MI reporting template, if for example:

- critical data is missing or the data looks odd, or
- the Authority is reporting a high value of awards where they have not been able to establish the household composition. We may need the Authority to explain why that is the case and provide supporting evidence.
- the Authority is reporting a high value of administration costs. We may need the Authority to explain why that is the case and provide supporting evidence
- there is a significant gap between actual and allocated spend. We may need the Authority to explain why spend is so low and any plans they have to redress this.

71. They will look to identify good practice and identify case studies where appropriate.

72. They also plan to engage with a sample of Authorities:

- during late November and December 2020, to get a feel as to how Authorities are implementing the scheme and understand any obstacles Authorities are facing.
- to obtain copies of their Delivery Framework to get a better understanding of how Authorities are delivering the scheme locally and the other types of organisations they are working with.

73. DWP will deliver a series of all LA calls through November and December 2020 to enable LAs to ask questions and seek points of clarification.

74. DWP will also continue to engage with Authorities to respond to questions we receive via the designated inbox as quickly as possible

75. Jobcentre Plus may engage with other local stakeholders to gather intelligence on how funding is being used and assess its impact.

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76. Where Authorities work with District Councils and TPOs it is the responsibility of Authorities to collect and collate MI and complete one collated MI return and submit to DWP.

DWP funding arrangements

77. This COVID Winter Grant Scheme is ring-fenced and any unspent funding will need to be repaid to DWP. To ensure that the objectives of the fund are being met during the course of the grant and reduce administration costs for all concerned, including the need for DWP to recover underspend, we have adopted a three stage payment approach. This will enable DWP to adjust the amount of the final payment based on the MI returns.

78. Payment of the grant from DWP to Authorities will be made in three instalments:

- First payment - 50% of your allocation at the start of the scheme (in early December 2020)
- Second payment - 25% at the end of February 2021
- Final payment - 25% following the end of the scheme in April/May 2021

79. The second of three payments (25% of funding allocation) is dependent on the MI return for December to end of January 2021. Where Authorities have spent less than 20% of their overall allocation during December and January, the second payment will be withheld and the remaining balance paid as the final payment at the end of the scheme in April/May 2021.

80. If an Authority feels that the December and January spend is not representative of the likely February and March spend, the Authority can make a request to DWP to make the second payment by providing the reasons why the Authority believe spend will significantly increase in the latter months of the scheme. This request should be made with the MI return in February 2021.

81. The second payment will only be made on receipt of the completed MI request.

82. Both MI returns must be endorsed by the S151 officer in accordance with their statutory assurance responsibility in order for the interim and final payments to be made by copying your Chief Financial Officer and Section 151 Officer into the email.

83. The guidance for completion is provided on a separate tab within the MI template.

84. The definition of spend includes grant funding that has been provided to vulnerable households, within the scope of the eligibility criteria, and within the period of the scheme 1 December 2020 to 31 March 2021.

85. Spend also includes 'committed spend'. For the purpose of this scheme committed spend relates to grant funding that has been spent and delivered to vulnerable households even though the vulnerable household may not have used their grant funding. An example would be the award of a food voucher on the 31 March 2021 to a vulnerable household. It would be unreasonable to expect the family to be restricted to redeem the voucher on the day of receipt. In this example spend has been committed

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by the Authority, support has been provided to a vulnerable household and, therefore, should be included as eligible grant spend. It would be reasonable to expect the vulnerable household to redeem the food voucher in the first few weeks of April 2021.

86. However, committed spend does not include large volumes of food vouchers, procured quite late in the scheme, which cannot be distributed to vulnerable households within the period of the scheme. Grant funding is intended to cover the run up to Christmas and the winter, we do not expect Authorities to stockpile large quantities of food vouchers for use after the scheme has ended.

87. Authorities that plan to order vouchers in bulk should attempt to be realistic in the volumes ordered to avoid holding large stocks of unused vouchers at the end of the scheme. Alternatively, Authorities may want to consider:

- purchasing vouchers on a sale or return basis, so that they can return any unused vouchers, or
- if the Authority wants to use the vouchers during 2021-22 they should be funding through other means.

88. The definition of committed spend for the purpose of this scheme does not affect its accounting treatment in accordance with normal rules.

89. The timetable for provision of funding and MI returns is as follows:

Funding:

Payment	Amount (%)	Date	Notes
First	50%	December 2020	Payment issued at start of scheme
Second	25%	End Feb/Early March 2021	Based on February 2021 MI return
Final	25%	Late April/Early May 2021	Based on final MI return and actual amounts spent.

Reporting:

Reporting Period		Deadline for return
01/12/2020	31/01/2021	14/02/2021
01/12/2020	31/03/2021	21/04/2021

Managing the risk of fraud

90. Fraudsters have been targeting COVID-19 support funds.
91. As with any welfare payment to vulnerable recipients there is a risk of fraud, as recipients might appear to be eligible when they are not.
92. To help mitigate this risk, Authorities should involve District Councils and other organisations chosen to administer this scheme to help identify vulnerable families, households and individuals. Engagement should start immediately and, ideally, no later than the end of November 2020 to provide them with the necessary and appropriate funding and any specific locally determined eligibility criteria.
93. Authorities wishing to work with TPOs to deliver the scheme **must** carry out suitable due diligence checks to ensure they are viable and able to deliver the support. So, for example, ensuring all charities are registered and taking extra caution if they are new organisations.
94. Authorities are also encouraged to ensure checks are in place to verify the identity of those eligible.
95. Authorities are encouraged to ask neighbouring authorities to work together to help prevent double provision – especially where allocation of provision is by school in one area and by residential address in another.
96. It is for Authorities to decide how payments are made to recipients. However, when making decisions, Authorities should consider the risks involved. Although they still carry fraud risks, vouchers should be used instead of cash where possible as this helps to mitigate the risk of the money being spent by the recipient on things outside of the policy intent.
97. Authorities should ensure that they consider and put in place suitable controls when making use of vouchers as part of this scheme. Authorities may wish to consider restricting access to these vouchers; and also consider restricting usage to ensure that they cannot be spent outside the intended scope of this Scheme.
98. Where possible, any payments made into a bank account should be in the same name of the person that is eligible for that payment. Authorities have access to a range of data sources, and checks can be carried out against this data to verify the identity of the recipient. Authorities are also encouraged to use existing tools at their disposal to verify personal bank accounts.
99. If the Authority has any grounds for suspecting financial irregularity in the use of any grant paid under this Determination, it must notify the department immediately, explain what steps are being taken to investigate the suspicion and keep the Department informed about the progress of the investigation. For these purposes 'financial irregularity' includes fraud or other impropriety, mismanagement, and the use of grant for purposes other than those for which it was provided.
100. If you suspect fraud, you should notify DWP at hdd.businessplanningteam@dwp.gov.uk of the:
 - number of instances
 - total amount lost
101. This will help DWP identify any emerging threats and share them with other Authorities, so they can take steps to prevent and detect any fraud in their schemes.

Individuals with No Recourse to Public Funds

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

Complying with State Aid rules

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

Administration costs

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

Public Sector Equality Duty

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

Questions and answers

- 113. Questions and answers can be found at Annex A

Contact

- 114. If you have any queries about the content of this guidance or use of the funding you can email hdd.businessplanningteam@dwp.gov.uk

Questions and answers

Q1. Why is DWP asking County Councils and Unitary Authorities to administer this instead of District Councils?

A1. County Councils and Unitary Authorities have a statutory duty regarding children. This is not to suggest that District Councils are not capable of delivering support. It reflects the focus of this grant and that support could take many, broad, forms and, therefore, the funding sits better with County Council and Unitary Authorities.

We would encourage County Council and Unitary Authorities to work with their district partners, as well as other organisations, as appropriate, to ensure the most effective support is delivered to as many families as possible.

Q2. What happens at the end of the funding year?

A2. The COVID Winter Grant Scheme runs from 1 December 2020 to 31 March 2021.

Authorities have discretion over how they use the funding within the grant conditions and within this time period. This includes payments made, or committed spend, by the Authority or any person acting on behalf of the Authority, during the stipulated period, under the scheme. Please refer to the guidance for more information regarding the definition of committed spend.

The extended Holiday Activities and Food Programme begins in Easter 2021 and it will provide enriching activities and healthy food to disadvantaged children.

Q3. Is it acceptable to use the grant funding for Free School Meals?

A3. The COVID Winter Grant Scheme is not intended to replicate or replace Free School Meals and Authorities should avoid duplicating provision where possible.

However, Authorities have discretion over how they use the funding within the grant framework and within the stipulated time period.

Therefore, Authorities may choose to offer COVID Winter Grant Scheme support to those families in receipt of Free School Meals, if they consider this to be appropriate in their area.

Q4. Can the Scheme be used flexibly for more strategic activity such as advice provision around financial hardship?

A4. The COVID Winter Grant Scheme funding must only be used to provide support as defined within the eligibility criteria in this guidance document.

However, Authorities may choose to deliver the COVID Winter Grant Scheme support in parallel with other activity that they are already undertaking to address wider financial hardship.

Should Authorities choose to adopt this approach, they must fund the additional activity to address wider financial hardship through means other than the COVID Winter Grant Scheme.

Q5. Can we make multiple awards to the same people or families?

A5. A family or individual can be supported on multiple occasions throughout the life-time of the scheme, should an Authority deem it to be necessary. All awards should be reported separately.

Q6. Can Searchlight information be used by Authorities to help identify suitable recipients for the COVID Winter Grant Scheme funding?

A6. Searchlight can only be used to verify a specific individual's DWP benefit information. Universal Credit award information is available on Searchlight. Therefore, if an Authority identified a group of potential claimants who may be eligible for the scheme from their own records, they can access Searchlight to verify those claimants' DWP benefit details.

Q7. Does there need to be a complaints and appeals process?

A7. The appeals process falls within each Authority's normal complaints and appeals process. Authorities will be responsible for making determinations on eligibility and as such will need to decide how they administer any complaints or appeals.

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