Summary of Responses to the 2007/08 Programme Grant Conditions Consultation

Top Up Fees	**Kent** – Content with the issues raised regarding top up fees. **Nottinghamshire** - Whilst not a common practice, this is a difficult issue for SP administering authorities to address, albeit that we have sought to do so through our contracts. A clear indication from CLG that this practice is not condoned is helpful particularly as the practice potentially puts the AA in breach of Grant Conditions as the service may not be provided free of charge to an individual who has a right to a free service. This development is welcomed. **Dorset** - supports the inclusion of the new condition 8(1) in grant conditions for non-excellent authorities. Dorset's new block subsidy contract does in fact already contain a clause covering this point: "The Service Provider shall not request or accept any payment for the support services provided under this Contract from any Service User that is greater than the Agreed Weekly Charge as set out in Appendix Two or, if the Service User is eligible for SP Subsidy, that is greater than any assessed contributions that have been determined by the Service Purchaser". However this has been questioned as unreasonable by some providers and its inclusion in grant conditions can only be helpful. **Southwark** - agree that steps should be taken to dissuade the practice of service users being expected to make payments above and agreed support cost. We therefore support the proposal to include a new condition covering this issue for non excellent authorities. **West Berkshire** - do not support the charging of top up fees and have been fortunate not to have experienced this with any of the services funded through the programme. We will work with our legal team to see how we can incorporate this into our contracts. However, a wider point needs to be made about why providers feel they need to make these charges. This is driven by uncertainty around the funding of the programme and ongoing reductions. **Hanover Housing Association** - It concerns the proposal to dissuade providers from levying top up charges. Hanover has levied such charges in the past, and wishes to continue to do so in the future, where the real cost of providing the service differs from the grant that the SP authority is prepared to pay. We would like to make the following points: Our charges for support services are overwhelming in the bottom quartile of charges, measured both nationally and in individual local authority areas. However, many administering authorities impose a unilateral solution when they are faced with budgetary challenges. Rather than concentrate cost reductions on the most expensive sheltered housing services, or the least efficient, they impose restrictions across the board. It would be

	fair, we believe, to set a maximum level for sheltered housing support charges within a local area and to expect the higher cost providers to gradually reduce their costs to match the more efficient providers. It is not fair, we believe, to expect those of us with very low charges to absorb the same reduction as our more expensive competitors. Our support charges are mainly derived from a proportion of our scheme manager costs. Schemes of up to 39 units of accommodation are managed by part time staff. Schemes of 40 units are over will have one full time staff member. Reducing the hours of that one (full or part time) staff member to exactly match the grant payable by the SP authority is not a practical proposition. Our support charges are a condition of tenancy. We set them annually, based on the true costs of the proportion of the scheme manager costs and alarm service costs that are charged to support. We do this in December and January, ready to issue rent and service charge review letters in February, given the statutory one month's notice of the new charges taking effect on 1 April. Very often, administering authorities have not decided on their new grant rates until very much later in the financial year. It is administratively almost impossible to harmonise tenancy condition charges with the timescales worked to by administering authorities. Around a third of our tenants do not receive Supporting People grant as they are not financially eligible. Restricting the service these tenants can receive, to match the administering authority grant rates, is not fair to them, as they pay for the charges from their own resources, in line with their tenancy agreement. **Cambridgeshire** - Cambridgeshire SP is opposed to additional levies being placed on service users. We support in principle the CLG draft condition to dissuade the practice of additional levies being charged to users but have concerns about how this may be enforced. When tenants sign a Tenancy Agreement with housing providers they enter into a legal agreement with that organisation. It may be difficult for a third party such as SP to influence that legal agreement due to SP being outside of the agreement and due to the number of tenancies and support provider organisations. **Nottingham** - Welcome CLG's intention to address the issue of top-up fees, the implementation of which we believe has caused hardship and concern for many people, particularly older people living in sheltered accommodation. We would however wish to see a stronger approach, with service providers prevented from requiring service users to make additional payment for housing related support services. We appreciate that services that are not housing related support services, are a matter for agreement between provider and user. We feel strongly however that no additional fee should be charged for housing related support, that has been commissioned by the SP Administering Authority and nor should any additional charge be levied for a service where a price has been agreed with Supporting People. We are also concerned that if a firmer approach is not implemented, there is a danger that the charging of top-up fees for housing related support could become the norm. In the case of adult residential services, the market has been significantly influenced by the charging of top-up fees, with a consequent impact on total costs to the public sector. We would wish to see a parallel situation in

	the case of housing related support avoided. **Leicester** - agree with the sentiments behind the introduction of the new paragraph trying to dissuade top-up fees. Whilst we are not opposed to the addition of this paragraph, we have always believed that the charging provision in previous years [section 8(3)(b) in the 2007/08 draft grant conditions] has always prohibited such top-up fees for support services. In addition, as worded, the new paragraph 8(1) is about consideration of changes to contracts. It would appear, as worded, that this would be better suited to statutory guidance rather than the grant conditions. **Devon** - We are opposed to top up fees becoming imposed upon service users as a result of inflationary uplifts to the programme lagging behind that which providers may see as necessary. We would always attempt to dissuade the continuation of this practice where it is occurring. However, we would urge that CLG ensure that the conditions could not be interpreted to suggest the Administering Authority has obligations to provide inflationary uplifts to contracts at levels that have not been made available to us within our programme grant allocation. **Suffolk** - Would welcome this clause as it would give authorities greater leverage in negotiations with providers, although the incidence in Suffolk is very small. **Torbay** - While to the best of our knowledge no providers are levying a top-up charge in relation to support charges and we have made it clear that this is unacceptable; we welcome the new draft condition at 8.1. A more concerning issue for us in Torbay, where there is of necessity a heavy reliance on private sector accommodation provision, is the fact that private sector rents for supported accommodation are capped by Housing Benefit at fair reference rent levels. This provides a disincentive to the private sector because we require properties to be of a high standard for which they can normally command far higher market rent levels. Would it be possible for CLG to influence this at a policy level? If SP accommodation based provision was exempt from these rules, in the same way that social provision is we could monitor and agree rent levels for this specific and limited provision through regional housing bodies or SP RIGs perhaps? **Stockton - on – Tees** - The Commissioning Body considered the draft Directions and Conditions and are happy to support the proposed changes including those for "Top Up Fees". **East Riding** - It is agreed that Providers should be dissuaded from increasing support cost beyond the Supporting People contract price and the inclusion of the new condition 8 (1) for non-excellent authorities will assist teams with the application in their contracts. **Solihull** – Would agree with the proposal to dissuade the use of service user payments over and above the

	agreed price for a housing related support service although it is appreciated that cost pressures and reducing payments may have led to such additional charges being introduced in some other authorities. **Bury** – is not able to support the proposal to introduce a clause in relation to top up fees. Bury has faced a reducing SP grant, and there has been no inflationary increase awarded on the level of the grant given. The result of this is that inflationary uplifts have not been given to providers. We feel that the result of this situation is that some providers have chosen to charge top up fees. In the absence of a year on year inflationary increase, this situation is inevitable. We do not feel that this clause could be implemented by small SP teams facing reduced grant. We would also contend that there is no evidence of consistency in policy terms across national Government. In particular Housing Benefit is often paid at a level beneath the market rent, with the service user having to pay a top up. We feel that this situation needs to be addressed and there should be consistency in policy terms across all sectors. **National Housing Federation** - This is an issue that the Federation has raised with the CLG in the past and we continue to be concerned that local authorities are still picking up instances of service users being charged above the contract (and therefore subsidy) price for a service. We have contacted all the providers who appear on the list of offending providers in more than one authority. Nearly every organisation said that it appeared on this list by mistake. We would like to question the extent to which over charging is occurring. Some authorities may have recorded instances where a provider has reserved the right to charge as part of a contract negotiation or as a landlord with a legal obligation to provide support as set out in a tenancy agreement and with an obligation to set rents and service charges within a strict timescale governed by statute. It is our experience that issues around a landlord's legal obligations are still poorly understood by some local Supporting People teams. We feel that the inclusion of this clause within the Grant Conditions will further tip the balance of power in favour of service commissioners who hold a local monopoly on buying housing related support. If starting from a blank piece of paper no one would construct a system where support and housing management were legally entangled in a tenancy agreement while being funded separately. However we did not have a blank piece of paper and therefore we ask the CLG to recognise that Supporting People funded services are still entwined in landlord/ tenant relationships. We believe that the proposed clause in the grant conditions will prove a 'blunt instrument' in tackling the problem it is set up to address. Government has deliberately keep the eligibility for Supporting People funding open and flexible without trying to closely define what is housing related support or set eligibility criteria. The Federation has

	always supported this position. We are now seeing local authorities setting their own eligibility criteria or determining the level of service offered by the contract price. A consequence of this process is that a service might be funded in one area that will not be funded in the next door authority. If a group of tenants lobby their landlord to provide a new service or continue an old one, and they agree to pay for it out of their own pockets, might the local authority step in to try and stop this because it feared breaching Grant Conditions? It is this level of inflexibility and unproductive scrutiny that we feel the proposed change in the Grant Conditions promotes. **Sheffield** - We agree with your point to dissuade subsidy-based services to impose top-up fees. We already do this when it becomes an issue and many providers, to their credit, impose this discipline on themselves. However, grant conditions will not solve this difficulty while the provider has the contractual right to levy additional fees; while Supporting People Grant continues to lag behind inflation and while the sheltered service sector copes with very limited funding that generally only covers the warden costs. In Sheffield we have been pleased to be one of the few authorities to afford targeted inflationary increases to providers, based on a value for money assessment. However, as overall funding to the sector has reduced and efficiency gains have been captured, the need for proper allowance for inflationary uplift becomes more urgent. Providers need to be able to adjust their charges to reflect real changes in the cost of service provision, or the risks to service users and providers will become unacceptable. Including this issue within the grant conditions is no substitute for adequate funding for the programme. **Bolton** - The Commissioning Body have a fairly strong stance on top up fees and generally dissuade providers from introducing additional charges which allow them to keep their service funding up to pace with inflation. To avoid this situation, the Commissioning Body have agreed to 2.5% inflation increases for 2006/7 and 2007/8 and there is agreement that services are not sustainable without an annual uplift to meet increasing costs. Therefore we support this move but believe that without additional Supporting People programme grant in the future that there this may need to be left open as a future option. **Oxfordshire** - Has always interpreted the Directions and the requirements of Fairer Charging as meaning a service user on a low income should not contribute out of their own pocket to the cost of housing-related support commissioned via Supporting People Grant. Our new contract prohibits the service provider charging the service user more than the amount agreed with the administering authority. Oxfordshire therefore has no objection to the proposed changes to Grant Conditions.

	CLG's response - Following careful consideration of all the responses on the subject of top up fees we have decided, given the Supporting People programme context of safeguarding vulnerable groups, to retain the proposed requirement - paragraph 8(1) in the 2007/08 grant conditions. This is to prevent service users being charged for services, particularly short term services which must be free to all at the point of access, above the service price agreed between the Administering Authority and the provider. Supporting People is a local programme, designed, delivered and monitored by Administering Authorities who have responsibility for setting local eligibility criteria, as well as contracting for the programme locally through a range of contractual arrangements and negotiations. Many authorities have reported that they have found the procurement guide launched by our minister last year very useful. We will be rolling out, later this year, the Value Improvement Projects nationally to further help Administering Authorities with the delivery of the programme.
Rent Deposits	**Kent** – As an authority we do not feel we should be responsible for the paying of rent deposits. **Hull** – The rent deposit proposal has been discussed with and has the support of the Core Strategic development Group, the Commissioning Body and some provider organisations who participated within the consultation. Hull City Council operated for a short period, a Bond Deposit scheme. Alongside a floating support service provided by a local provider, and these comments are based on experience and learning from the operation of this scheme. The comment in Annex A of the consultation document relating to what arrangements should be made should a deposit not be repaid due to damage: implies the proposal refers to a Deposit / Bond scheme rather than to rent in advance. This needs early clarification. If proposals are based on a scheme which includes rent in advance, then we believe that the client should be receiving a SP service to qualify and use the deposit scheme. The CB should not need to approve each individual rent deposit request, although as with any new scheme, the CB would need to give approval to the establishment of a new service or a new scheme. If such a scheme were to be set up, we believe the best way of implementing it would be to have a low level floating support service with a bond scheme attached. This scheme could then be responsible for the repayment of deposits; the recovery of deposits where damage has occurred in the property; and coordinating references, credit checks and insurances. There would, however, be significant resource implications. We feel that the deposit should be repaid after a set time-scale of the tenancy running successfully. If the scheme were to be administered within the SP team, concerned about the volume of work that would be created in setting up and recovering deposits. The agency undertaking this service would need to ensure that properties within the Rent Deposit scheme are fit for purpose and comply with various health and safety and

landlords regulation. Specifically, the schemes need to tie in with the new Tenancy Deposit scheme due to be implemented in April 2007. Due to the volume of work envisaged by this scheme, we feel a low level floating support service with a bond scheme attached would be more suitable than providing the service from within the SP team. If the Rent Deposit were to be paid in cash, the preferred option which may be cheaper and more cost effective will be to issue payments under set criteria, rather than issue a rent deposit as the potential cost of administration and recovery would outweigh the benefits of the scheme. It may be helpful to pilot a number of different options within a few AAs prior to making changes to the grant conditions to ascertain effective criteria and working processes.

Nottinghamshire - We are surprised that, when there are a range of different sources for rent deposit schemes, some authorities want to use the Supporting People funding. Nottinghamshire already has a number of rent deposit schemes and the Supporting People team has never been approached to fund any new schemes or to extend those that exist. They don't need significant levels of funding and smaller pots of money can therefore be used. Any decision to fund such schemes should be made by the Commissioning Body – it is a major shift in strategy.

There are real dangers if, year on year, non-housing related support services are added to the definition of services eligible for SP funding and we risk losing sight of the programme's focus.

Dorset - supports the proposed grant condition enabling authorities to pay rent deposits to landlords on behalf of service recipients. The questions in Annex A were discussed and the following points were made: Commissioning Body should agree the criteria for deposits, set the budget to be applied and monitor the working of the scheme - rather than having to agree each individual deposit. Dorset sees the chief value of SP funding of rent deposits as a tool for achieving move-on. Rent deposits at other points, such as to prevent homelessness, can be funded by existing schemes run by housing authorities. However grant conditions should allow flexibility for authorities to pay rent deposits in any way that enhances the provision of a support service. Use to achieve move-on might indeed mean that it is the last service to be provided under a support package, although it is more likely that support would continue during the moving-in period. Issues of repayment will in deed prove challenging. Dorset believes that the grant conditions should allow the issue of bonds rather than cash deposits, to lessen the need to claim back money in every case and to put the onus on the landlord to claim if and when damage occurs. Authorities have built up experience of deposit and bond schemes, and grant conditions should not be too prescriptive - the principle of being able to fund deposits (or bonds) and the requirement that appropriate procedures are in place to ensure that moneys paid out are recovered (either from the landlord, or, in cases of damage, from the tenant) is sufficient.

Southwark - strongly support provisions to make this possible given the acute move on issues Southwark and

	many boroughs face, which is coupled with limited scope to fund such schemes from other resources. We also wish to make the following comments in relation to the specific questions asked within the consultation document. **Commissioning Body Consent** – we believe that consent should only be required as part of agreeing wider contract terms with providers where sum of grant are included for the payment of rent deposits. We would not support an approach that required consent for each and every individual case. Adopting a more strategic approach would allow the relevant services and contracts to have provisions built in around move on support and rent deposits which can then be robustly monitored through contract performance monitoring processes. **Links with support packages** – we would agree an approach that primarily links rent deposits with a planned package of resettlement and move on, and we consider that this package should be able to be ongoing and do not consider it appropriate to regard the payment of a rent deposit as the last service that could be provided under a package of support. **Repayment of rent deposits** – we believe it is important to highlight the need to strike a balance between the cost of not requesting repayment of rent deposits with the cost of pursuing the recovery of a rent deposit, which may be difficult in some circumstances. We would also highlight the difficulties that exist in engaging with private landlords to create wider move on options for vulnerable groups. We would strongly oppose any requirement placed on authorities to pursue landlords to return deposits, especially in circumstances where damage has been caused, as this would only serve to limit the scope of boroughs like Southwark to develop move on initiatives. Equally we would see it as inappropriate to pursue individual service users. Where damage has been caused by the user this may be a consideration to be made in relation to future suitability or eligibility for a rent deposit scheme. **Other issues** – With reference to the recovery of deposits we believe that some of the financial risks of non recovery may be built into the contracts with providers. Targets for move on can be interlinked with the offer of rent deposit funding within the SP contract, which when linked to ongoing packages of support can enable providers to recover and recycle deposits. **Plymouth** - The City recognises that vulnerable people may be prevented from accessing private sector accommodation partly due to a lack of money to fund rent deposits required by landlords. In light of the need to support people to access a variety of accommodation options, and the Government's Tenancy Deposit Scheme, Plymouth City Council is currently developing a one-stop Deposit Guarantee Scheme in partnership with stakeholders including the Probation Service and the voluntary sector. The scheme will be open to all applicants, whether they are assessed as statutory or non-statutory homeless, and meet the needs of vulnerable people including those moving on from supported housing. A voluntary sector partner will manage the scheme. The agency will hold the deposit rather than the landlord and in essence no money would change hands at the start of the tenancy, being claimed by the landlord only if the client damages the property during the course of the tenancy. **Commissioning Body's consent** - In light of the reductions in funding and the additional pressures placed on available grant by the inclusion of handypersons services and the respect agenda, the Plymouth Supporting People Partnership is cautious about the further extending the eligible services that can be funded. However, the

	Partnership is aware of the difficulties that some people face in accessing private rented accommodation, partly as a consequence of a lack of money to fund rent deposits. The Partnership is also aware of the difficulties in relation to the availability of suitable move-on accommodation and need to facilitate access to a variety of accommodation options for people moving on from and using supporting people services. The Partnership is therefore open to giving further consideration to using a small proportion of Supporting People Grant for rent deposit guarantees. In order to take into account local pressures on the grant and service developments, Plymouth considers that should rent deposits become eligible for SP funding consent will need to be sought from the Commissioning Body to ensure a co-ordinated approach. Also Commissioning Bodies may wish to retain control over how funding is utilised in the provision of this service; e.g. whether used for rent deposit or deposit guarantee schemes. **Link to support package** - The development of the Supporting People 5 year Strategy, ongoing work with service providers and the Plymouth Move On Project (MOPP), have highlighted significant issues in relation to move-on. These have primarily focussed on the availability of appropriate move-on accommodation and reluctance on the part of some agencies to support service users to access the private rented sector. The Partnership therefore considers that should SP grant be utilised for rent deposits, funding should be targeted to facilitate move-on from SP funded services. Any such shift should be made parallel to changes within SP contracts that encourage service providers to support clients to access a range of accommodation options. Should the focus for an SP funded rent deposit scheme be move-on, then consideration would need to be given to the provision of floating / resettlement support to maximise the individual's chance of success with a private sector landlord. Should rent deposits become eligible for SP grant, the primary focus should be a positive outcome for the client; i.e. that they are able to successfully access and sustain accommodation. For some, therefore, ongoing support may be necessary and should be assessed on a case-by-case basis. **Repayment of rent deposits** - The Deposit Guarantee Scheme being developed in Plymouth provides a guarantee to landlords rather than a cash payment. This method of operation negates the need for repayment and other administrative functions. Although Plymouth's current scheme does not address the issue of rent in advance, this matter is currently being given further consideration in conjunction with the credit unions. To date schemes that have operated in the City have not experienced a high claim rate, although further work is being undertaken to determine whether processes should be established to reclaim monies in the future. **Other issues** - Should rent deposits become eligible for SP grant, clear criteria and processes will need to be established to ensure that the use of grant in this way does not fund statutory duties. In addition, the Plymouth Supporting People Partnership would be interested to learn what measures CLG will seek to introduce to monitor the use of grant in this way. **West Berkshire** - We regard the flexibility to offer rent deposits as a positive step to promoting move-on from short term services. On the particular points raised:

We believe the Commissioning Body should agree a proportion of the budget to be used in this way, but that the individual decision should remain at an operational level. In terms of who should be funded we do feel it should be directed at people in receipt of short term services. We feel that some people will always need a level of support and we would not want to inhibit their chances of move-on by excluding them from receiving a rent deposit funded through the programme. In terms of how this would be administered, we have agreed with our colleagues in Housing Operations this would be through them, the rent deposit would be repaid upon them leaving the accommodation. They currently deal with rent deposit by offering a letter of guarantee to a private landlord. Once the tenant serves notice the landlord makes an assessment as to whether the deposit should be returned in full, if they feel that there should be a deduction then they would evidence this and agree it through Housing Operations. We would adopt the policies currently in place through Housing Operations. We do not see the need for a specific accounting process outside what is already in place. It would be administered through a Service Level Agreement.

Cambridgeshire – **Commissioning Body's consent**: Yes as it would require the allocation of new investment but consent would need to be kept at a high level i.e. £40k allocated for a scheme for one year. Given the pressure on budgets and the gaps which have been identified by reviews its unlikely that this would be a top priority for the Commissioning Body in Cambridgeshire. **Links with support packages** - If SP money was used we would favour a more flexible approach i.e. targeting rent deposit for a wide range of people and feel this would be in line with developing more personalised services. That said SP funding should not be used for individuals who have no housing related support needs unless they have recently completed a package of support. In all cases some assessment of the recipient's suitability to a deposit bond scheme should be made. In some areas a deposit guarantee method is adopted whereby the cost of the deposit is underwritten by an authority but only paid if required when the tenant leaves. We would recommend this approach to save on the unnecessary costs and complexities of claiming money back from users. **Repayment of rent deposits** - If it is necessary to recover deposits this should be undertaken as per current corporate arrangements for recovering debt where a judgement is made on the cost and difficulty of recovery relative to the size of the debt. **Other issues** - The biggest issue the proposal raises is that it represents an additional pressure on an already diminishing SP budget. Many housing authorities already provide deposit bond schemes and there is a danger that they would want to use SP to fund these in favour of their existing funding sources. Another issue is that if there are no controls on who accesses SP deposit bond schemes SP funding would be used to fund people who have no housing related support needs. There may also be IT issues to resolve if local computer systems are not set up to report on deposit bond transactions. Finally checks would need to be in place to prevent the system being abused. It would be necessary to prevent an individual using the scheme repeatedly where they have previously caused damage to a property or left intentionally only to request another deposit at a later date. In Cambridgeshire we are already aware of

	individuals who have left tenancies causing damage to property and owing money. It would be important to consider the situation carefully before offering such individuals a fresh deposit. It may be the case the Tenancy Deposit Legislation which comes into effect in April 2007 brings effective measures in place to address some of the issues above. It would also seem appropriate to use the legislation to launch the National Rent Deposit Scheme, which has been discussed in the past. **Kensington and Chelsea – CB's consent:** We have a number of concerns about the payment of SP grant for rent deposit schemes when local authorities are struggling to maintain existing funding to much needed services or are unable to identify funding for new priorities. Whilst authorities have a responsibility to ensure that the SP grant is managed efficiently, we would prefer to see SP funding targeted at traditional SP services rather than be used to alleviate overall problems in addressing the supply of affordable housing which is a much wider housing issue. **Links with support packages**: In the event that rent deposits are fundable under the programme we believe that at least initially this should be connected to services that are provided to help a vulnerable person move on. People should be formally assessed as having no other housing options and should be assessed as being 'ready to move on.' This needs to be determined by an individual's needs and linked to outcome based objectives of a service users support plan. **Repayment of rent deposits**: It would be preferable if people were only allowed to access rent deposit schemes that are overseen/provided through authorities; this would include regulation of standards and ensuring that vulnerable people are linked into floating support services. Payment of the rent deposit is a transaction between the authority/contracted provider and the landlord. The full rent deposit would then be returned directly when the tenancy ends. This should be part of the contractual arrangements between the authority and the landlord – forming part of the management and regulation of those landlords participating in the schemes. There should be an approved list. **Nottingham** - In respect of social housing we feel that the charging of rent deposits is unacceptable and no policy should be adopted that would encourage or legitimise this. Whilst we would support looking to open up the private rented housing sector, we are not in favour of the use of Supporting People grant to provide rent deposits. We are concerned that making cash payments available to secure accommodation in the private sector would create a culture within that sector which could ultimately act against people on low incomes. Landlords who do not currently require a rent deposit or ask for only a limited sum, may be tempted to require payment as a result of it being available. As personal funds would not be available for all people on low incomes requiring accommodation, those who are not in need of housing related support for example, this could create a negative impact. We also believe that the potential administrative burden of a rent deposit scheme that requires repayment could be huge and complex and limit the numbers of service users who might benefit. As an alternative we propose that CLG considers the use of Supporting People grant to support 'rent guarantee' or 'bond schemes', thereby

indemnifying landlords against a specific level of financial loss, rather than providing rent in advance. Many such schemes are currently operating successfully, including one in here in Nottingham. Bond schemes result in the same effect of opening up the private sector to clients without a lump sum in advance, but without the same level of money changing hands and the consequent administration costs. The upper level of guarantee could for example be the equivalent of 4 weeks rent. Service users who have received housing related support in temporary accommodation or who are currently in receipt of a floating support service should as a result of that support, be able to manage their tenancy and ensure rent payments are made, thus reducing the risk of the underwritten funding being required. The underwriting would, however, offer the landlord the comfort of knowing that any delays in benefits or other funds would not disadvantage the landlord. Should CLG agree to amend grant condition to allowing rent deposits, we would welcome the flexibility for the conditions to permit the use of Supporting People grant for either rent deposits or for bonds, according to the preferred local approach.

Leicester - While Leicester understands the benefits of rent deposit schemes, it does not believe the Supporting People programme is the appropriate vehicle for their administration, nor necessarily the best strategic lead for them. Rent deposits, by nature of it being rent, should continue to be the responsibility of those that have a lead / link to rent payments. The nature of the payment is fundamentally different to anything else the Supporting People Programme administers and is not felt to be 'housing-related support', in the sense that it is an advance payment of rent itself (as opposed to support) to help secure accommodation.

If however rent deposit schemes are considered appropriate for Supporting People funding, then how these are administered needs to be considered carefully. The proposals seem to place the emphasis on the Administering Authority administering the rent deposit scheme themselves, whereas it would seem more appropriate for the SP Programme to commission this service from a specialist agency. This service could be provided by a support service provider alongside housing related support, or could be provided by a specialist agency and "bought-in" by support providers. The chosen provider would need to establish what percentage of deposits is likely to be lost and build this into the cost of their service.

All that would be required is the addition of costs of operating or buying into a rent deposit scheme be classified as an eligible task for Supporting People purposes. Treating rent deposit schemes in this matter would appear to mitigate any financial and accounting issues. It would also limit SP expenditure and eligibility to those already receiving a package of support. Finally, we would agree that the Supporting People Commissioning Body should always agree local eligibility.

North Somerset - it would be helpful if the SP funding could be designated as a small block for existing schemes and for SP clients only, but only where need driven. Unused funds should attract interest by the scheme which could either be used for additional deposits or be repaid to SP.

Deposits should be open to all potential SP clients, although with move on, short term or floating services it might be difficult to administer as the principle is that in general leakage of funding should be limited. Most SP vulnerable clients would have difficulty with repayment if their support or accommodation withdrawn or if at the end of fixed term they were not in a position to repay. If SP is to pay for deposits is must be accepted by both the CLG and AAs that losses will be made if we are to make any scheme equitable.

Any scheme could not be covered by current SP monitoring and PI arrangements, so any accountability bureaucracy would need to be very limited and precise.

Doncaster - Having considered the implications surrounding the introduction of SP funded rent deposits, Doncaster's Supporting People Commissioning Body have agreed that this is not something they would support if introduced in the revised grant conditions.

Devon - Very much in favour of flexibilities which would enable non-excellent authorities to pay rent deposits to landlords on behalf of service recipients to help them take up accommodation. We feel this would have significant potential to address move on out of short term services, and support greater independence. However, we recognise the risks of doing this outside of a clear outcomes framework, and would suggest that the conditions specify the need for any allocations of this sort to be evidenced in strategic planning and service user support plans. Furthermore, we suggest that this flexibility be dependent upon achievement of an 80% recyclability target, or other means to ensure that funds are not misused or diverted away from their central purpose.

Suffolk - There is much merit in the principle of a Rent Deposit Scheme and it would be a useful addition to facilitate a package of measures linked to a Move-on Strategy. A number of Districts in Suffolk either participate or have past experience of running such schemes and are aware of the administrative difficulties involved.
Commissioning Body consent - The approval of the CB should be sought before a Rent Deposit Scheme is introduced. **Links with support packages** - We would agree that a Rent Deposit should only be payable as part of a package of eligible welfare services and would want to link it specifically to move-on arrangements. We would envisage it being a component of a fully consulted move-on strategy and would have clear guidelines surrounding its eligibility and use, and linked to an outcome of achieving independent living. We think it should be flexible as to how it is used, and the Local Authority should decide the specific criteria. There is merit in using Rent Deposit Schemes at the beginning of a tenancy, viewed as a move-on arrangement, when support is very much required. This would help to access accommodation, and also help the service user to undertake responsibility for budgeting and financial management. A successful use of Rent Deposit Scheme funds could be linked to the criteria for

	service users who are ready to move to full independent living. **Repayment of rent deposits** - We would agree that rent deposits should be repayable. An agreed timeframe for this should be agreed at the beginning of the tenancy. Any damage to the property should be recoverable by the landlord and the responsibility for repayments rests with the service user. Realistically, the Administering Authority would act as guarantor and would have to process bad debts. There are a number of examples of Rent Deposit Schemes and the detailed operation should be left to the local authority to determine what is best to achieve their stated outcomes. We would not expect the Administering Authority to administer this process but would set a detailed policy approved by the Commissioning Body which would then be administered by a provider. The service would probably need to be linked to the provision of a non-accommodation based support services. The Rent deposit policy would cover issues such as: eligibility, approved landlords, property inspection at the start and end of a tenancy, repayment terms, link to a credit union and bad debts provision. The Commissioning Body would need to consider the cost of administration against the level of funds it would make available. **Hackney** - Like many short term accommodation based projects across the country, Hackney services experience high numbers of people not moving on within the two year target due to lack of alternative accommodation. This can result in people staying too long in services when they no longer need the support. This does not represent value for money for the authority and can also be counter productive for service users as they become disillusioned and the progress they have made can be reversed. Hackney provides a relatively large move-on quota but in spite of this demand out-numbers supply. The availability of funding and a service to help service users access the private sector would be tremendously helpful. We do not think AAs should take on the role of payment and repayment of rent deposits but should instead be able to contract Rent Deposit Services with the necessary skills to manage all tasks associated with private lets including deposits, management of relationship with private landlords including exactly what the deposit covers etc. The Commissioning Body would need to agree the commissioning of such a service which would need to be monitored like other SP services. Rent Deposit Services would be required to provide a support package to service users to ensure the rehousing is successful and one eligibility criteria for acceptance by the service would be the acceptance of a support/welfare package for a defined period after the tenancy commenced. We believe that the service should give priority to service users living in short stay accommodation services. We believe that service users should be required to repay deposits. However if a good Rent Deposit Service was contracted there would probably be no need to actually hand over deposits to landlords who could be given a rent guarantee. The risk of loss would therefore be reduced. Where there is loss we believe service users should be pursued for repayment but an assessment would need to be made about the likelihood of recovery. The Rent Deposit Service would need to have a whole range of

	risk and financial procedures in place including eligibility, assessment and referral arrangements, liaison with original support service, arrangements re when a deposit should be paid, number of rents which can be guaranteed at any one time. **Torbay** - We would like to have the flexibility to contribute to the Council's rent deposit scheme as appropriate from the SP grant to help us to maximise throughput by fully utilising the private sector in partnership with other services. **Stockton - on – Tees** - The Commissioning Body considered the draft Directions and Conditions and are happy to support the proposed changes including those for "Rent Deposits". **East Riding** - The Housing Department currently have suitable policies and procedures in place to administer a successful rent deposit scheme and therefore it is felt unnecessary to develop such a scheme through the Supporting People programme. It is also questionable that the grant at the current level could sustain the extra commitment. **Solihull** – Would agree that the use of Supporting People grant for payment of rent deposits should be allowed where the need for such provision can be clearly demonstrated and funding cannot be achieved elsewhere. Such schemes should not, however, be expected as part of Supporting people services. However, it should be clear that where authorities have serious issues regarding securing move-on accommodation for people leaving supported housing this should be a positive enhancement to existing services. It should be noted that any system, if introduced, would add further administrative complexity and this would clearly need to be taken into account in the future allocation of administrative grant. It is felt that the specific details of such schemes should be a matter for individual authorities to determine. Likely considerations not mentioned in the consultation document include the level of payment per service user, possibly determined by property size and type and the need for this, along with the maximum total grant to be paid out at any one time and the maximum 'loss' from non-repayment to be accepted over a period of time. Any system would need to be carefully monitored regarding cost and value for money and re-evaluated on a regular basis. An alternative possibility would be the use of Rent Guarantee schemes administered through SP. Solihull is currently developing a rent guarantee scheme (not SP funded). This has the benefit of security for landlords whilst payments will only be made in appropriate situations as necessary. **Bury** – Does not support the proposal that SP grant could be used for rent deposits. The SP grant is targeted at housing related support; Central Government has issued enough guidance on this matter. We feel that to expand payments to rent deposits would blur this boundary. We also feel that the payment of rent deposits is a matter about access to accommodation and is in essence a housing function not a SP function. We fail to see how Bury

	could pay for rent deposits given the reduced amount of grant, and the proposals also seem to be administratively complex. **National Housing Federation** - The Federation does not support the proposal to extend the use of Supporting People money to rent deposits. We do not dispute the significance of these schemes in helping to house people, including people moving from supported housing. However we feel that this would set an unhelpful precedent in using the programme to fund something that is not housing related support. We have frequently raised the danger of the programme being redirected to concentrate on fulfilling local authority statutory duties. This change appears to be a move in that direction even while the ringfence around the money is retained. At this time it is vital to retain a focus on housing related support services and their purpose. We support the continued to use the definitions set out in the existing Grant Conditions. **Sheffield** - We welcome this extension of the flexibilities enjoyed by excellent authorities. In this case, we can see advantages in assisting move-on from existing services but would still limit rent deposit schemes to clients entering (or exiting) a programme of support – not as a payment for everyone. However, whilst we welcome the flexibility we are not convinced resources would be easily – or quickly – released for this purpose. We do not support this move if the intention is to withdraw other funding streams that assist authorities with rent deposit schemes. Any threat to rent deposits could well destabilise our Temporary Accommodation Strategy and our ability to halve the use of temporary accommodation by 2010. **Cornwall** - The possibility of using SP grant to fund rent deposits we feel is a positive one and would welcome this flexibility within the grant conditions. This would however need to be carefully managed in such a way as to minimise any additional administrative burden. **Commissioning Body consent**: Yes, the consent should be obtained before any funds are allocated to a rent deposit scheme. As the rent deposit scheme should be targeted to meet strategic priorities and should enhance and not wholly replace existing bond schemes. Restrictions should be in place regarding the use of funds and the rent deposit scheme should be used to enable users to move on from accommodation based services into private sector tenancies. Rent deposits should also be used to facilitate move-on from institutional settings into independent accommodation with support. **Links with support package:** whether the rent deposit payment is a 'last service' or part of continuing support should be flexible according to need and circumstances. **Repayment of rent deposits:** should be repaid in full either at a point identified within the service users support plan of building up their own deposits or on exit from the accommodation. However, this would impact significantly on administrative processes including pursuit of outstanding debts. **Other issues**: there should be eligibility criteria in place for rent deposits, the use of SP grant will raise significant administration and financial issues and consideration should be given to contracting out the service to either a service provider or the

	local housing teams, alternatively, allocations could be made to short term services for them to manage their own rent deposit schemes for service users within their schemes. **Bolton** - We welcome the flexibility for all councils to use the Supporting People programme grant as rent deposits. The difficulties posed by the shortage of move on housing for vulnerable homeless people, can make it difficult for temporary services to operate as short term. We would only intend to use this flexibility in limited situations to unblock vital supported housing resources and not necessarily to just widen the access to rent deposits. **Somerset** - Our response is based on a consultation questionnaire, which was circulated to members of the Commissioning Body and all our Service Providers, at the end of December 2006. **Commissioning Body' consent** - A number of responses were made, around the appropriateness of Supporting People administering rent deposit schemes, which some Providers felt should be the responsibility of the local housing authority. Concerns were also raised as to whether this would make the process too lengthy, to benefit individual tenants. **Link to support package** - The majority view was that such a scheme should be available, in conjunction with an identified housing related support need. A point was made that if there were restrictions to receipt of the rent deposit, to those recipients who are in receipt of other welfare services, then this could potentially exclude vulnerable people who survive on a low income and are not in receipt of other welfare assistance. It could be either, depending on the needs of the individual. If the only way a tenancy is going to be sustainable is to continue to provide ongoing support, then this should continue. A general view was that if support is needed, it should be provided, at any stage of the tenancy, to avoid the consequences of a failed tenancy. **Repayment of rent deposits** - The majority view is that it would incur financial hardship, to require repayment before the service recipient leaves the accommodation. A number of solutions were identified within the responses received, regards how best to secure the rent deposit repayment. A valid point raised in response to this question, is that repairs and maintenance are not eligible, as part of a support charge and Supporting People funding cannot cover these costs. Supporting People could however, act as an arbitrator/mediator, where there is a dispute between the landlord and the tenant, regards repayment of the deposit. The favoured option, would be for a repayment agreement to be reached (long term instalments may be necessary), on an individual basis, for any outstanding monies. This could then be monitored through standard debt recovery procedures. **Other issues** - There was agreement from all organisations that responded that eligibility criteria would have to be in place, for such a scheme. There was general agreement, that managing such as scheme would require dedicated administrative resources. The financial loss, if the scheme is not managed effectively, would have an impact on the local authority concerned. **Oxfordshire** - Happy to see the Grant Conditions amended so that authorities which wish to do so may use Supporting People Grant to pay for rent deposits. This may assist them in tackling problems with move on from

	short-term, accommodation-based services. Oxfordshire has no intention of spending its much-reduced Supporting People Grant in this way. Oxfordshire will continue to spend what is left of its Supporting People Grant on support staff. Oxfordshire would be concerned if Supporting People Grant replaced rather than supplemented existing funding for rent deposit schemes and suggests the Department should seek to ensure the latter is the case if it proceeds with this possible change to Grant Conditions. **CLG's response** – We have included in the 2007/08 Grant Conditions a condition which will enable authorities who wish to use their Supporting People funding for rent deposits which will assist 'move-on', to do so. This condition does not place a requirement on Administering Authorities to make rent deposit payments out of their Supporting People grants, but rather offers flexibility to authorities who may wish to exercise this option. Where an authority decides to fund rent deposits through Supporting People, the consent of the Commissioning Body should be sought and the payment must be provided in conjunction with housing related support services. We recognise that some Administering Authorities already have arrangements in place to help service users with securing accommodation - such as Bond or Rent Guarantee Schemes - and we support the continuation of such arrangements. There are a number of good practices which have been mentioned in your responses to the grant conditions on this particular subject, and CLG would encourage authorities to share these with others.
Comprehensive Performance Assessment	**Dorset** - supports the proposal that the labels "excellent" and "non-excellent" should be retained and the proposed application of the "excellent" label to 3 star and 4 star authorities. **Southwark** - welcomes the proposed revisions the directions to take account of changes to the CPA process. In particular we welcome and support the proposal that 3 and 4 star authorities should be subject to the grant conditions for excellent authorities as we believe that this will give greater scope to more authorities to deliver the programme more effectively and with greater flexibility in relation to the key national and local outcomes the programme should be achieving for vulnerable people and the wider community. We also agreed that the labels of 'excellent' and 'non excellent' are well understood and have no objection to these being retained. **Nottingham** - We would like to take this opportunity to address the basic principle for the difference in Supporting People Grant Conditions between excellent and non-excellent authorities. The fact that a local authority has been deemed excellent for Supporting People purposes by virtue of its CPA scoring does not seem entirely logical or fair. It would seem more relevant to the delivery of the SP programme to consider the outcome of the Audit Commission's inspection of Supporting People in determining which grant conditions would apply, if indeed there need to be 2 different sets of conditions. We would point out that Supporting People is a partnership with Probation and Health and not a local authority

	activity and that in Nottingham, the Supporting People partnership was viewed very positively by the Audit Commission, the SP inspection outcome for Nottingham City being better, at 2 stars with promising prospects for improvement, than our overall CPA score. We are thus bound by the non-excellent conditions despite the success of Supporting People. We would therefore ask CLG to note this apparent anomaly and consider the application of excellent grant conditions to high performing SP Administering Authorities, as assessed by the Audit Commission inspection regime. We would also suggest however that CLG considers whether there is really a need for 2 different sets of grant conditions, given that we are now 4 years into the Supporting People Programme and are to be working to a national SP strategy and national outcomes framework. The grant conditions in their current form are restrictive and do not allow flexibility or encourage innovation. **North Somerset** - CPA Assessment – can the definition make clear if it is the CPA rating for the whole authority as it may be seen as unfair given County and District relationships and the various ratings for departmental SP responsibilities which may be at odds with CPA rating. In addition, should not the ‘excellent’ rating be based on the latest CPA assessment and must surely be changed each time the rating changes, otherwise where is the incentive to improve? **Devon** - welcomes the proposal that 3 star as well as 4 star authorities should be subject to the conditions for excellent authorities. Devon's programme would welcome the flexibilities that would become available to the Council because of its Excellent Status, and make good use of them to ensure greater coherence of provisions to service users across the sphere of Care, enabling and housing related support. We also believe this flexibility will assist our efforts to align the programme to the Local Area Agreement. We would however, welcome greater clarity over the flexibilities afforded. CLG guidance over 'welfare services' appears spread over a number of documents, and we would suggest improved guidance is necessary to enable authorities plan with confidence. **Torbay** - It seems reasonable that the star ratings are used to determine excellence during 07/08. **Solihull** – Are in agreement with the changes in determining of ‘excellent’ and ‘non-excellent’ authorities. **Sheffield** - We welcome the extension of “excellent” to encompass both 3 and 4 star CPA rated authorities. We also welcome the similarities between excellent and non-excellent grant conditions and hope this will enable closer working between authorities; a reduction in regulation and further mainstreaming of SP work.

	Bolton - The Commissioning Body understand the new categories of rating and are keen to ensure Supporting People continues to assist Bolton in meeting the improving performance standards. We also agree with the principle that 3 star and 4 star authorities should be subject to the conditions for excellent authorities. However we are concerned that where an Supporting People programme within an 'Excellent Authority' is inspected by the Audit Commission and receives a low rating such as zero or one star then we do not think this revision should apply. **CLG's response** - It is important that Supporting People is viewed in the wider context of the overall business of an Administering Authority rather than as a detached / stand alone programme. Supporting People contributes to a wide range of national Government objectives, and to local and regional objectives; any separation of the programme from the realm of public services can only but have a negative impact on service users who, more often than not, need to access integrated services. CLG will therefore continue the tradition of using the outcome of the Comprehensive Performance Assessment to rate the performance of Administering Authorities.
Outcomes/BVPIs & PAFs	**Cambridgeshire** - The condition states that if Administering Authorities fail to meet either local or national targets for the assessed BVPI's they will need to co-operate in developing an action plan with the Secretary of State to remedy the situation. It is our understanding that the way PAF indicators are set up SP does not feature as a trigger or a service type option. We have previously sought clarification on this issue by CLG but remain concerned that if it is not possible to show performance of SP against PAF then it does not seem logical to penalise SP regarding underperformance on these indicators. We understand that the CLG will be reviewing the BVPI and PAF requirement and would ask that you give this area further consideration as part of the review. In the longer-term we support the idea of developing joint performance measures with health, social care and SP as this will help to strengthen our partnership working. **Kensington and Chelsea** - In the GCs for non –excellent Authorities, there are conditions set out in Annex B (7) regarding Administering Authorities Performance with regard to BVPIs and PAFs, as well as the list set out at Schedule 2 of those PIs. These should also be included in the GCs for excellent Authorities as they also apply. **Nottingham** - Would suggest a more flexible and outcomes linked approach be adopted which would reduce the emphasis on eligibility and focus instead on the outcomes of service provision both for individual service users and more widely. **Suffolk** - Given that the SP Programme represents a range of client groups this list does not cover many of them

	and there would appear to be a bias towards those groups already well represented by other statutory partners, such as Learning Disabilities and Older People. Whilst this sends out a message that SP has a role in linking to the performance of other bodies it also has the potential to adversely affect those client groups not directly mentioned that are primarily classed as socially excluded. In trying to achieve these targets, funding could be redirected away from groups that have traditionally not benefited from statutory funding – a key reason for the establishment of the SP Programme. Some targets are too narrow such as: repeat homelessness, as this would miss many people who should be prevented from becoming homeless at all. Adults with mental health and learning disability – if this definition is based upon the ACS criteria, then there would be many potential service users missed. It would also mean that SP would not be functioning effectively in the prevention agenda. All targets should be a local rather than a national average, as there are considerable differences between areas. It allows Local Authorities to address issues specific to their area. For instance, Suffolk is predicted to have a greater increase than average in the number of older people. Finally, in the notes three key performance indicators are mentioned for SP, but we were advised that only two would be required. Is this an oversight? **CLG's reposnse -** CLG will no longer be looking at related BVPIs and PAF indicators but will look to the outcomes framework to help demonstrate the worth of the programme; therefore, references to BVPIs & PAFs have been removed from the grant conditions. **KPI 1 and 2 which are mandatory will continue to be collected.**
Definitions	**North Somerset** - P4 – b) iii) – this definition should be clearer and at least relate to housing related support. - 'any service whose aim is the maintenance of a limited degree of independent living which is not expected to increase'. P8 – 5) (b) 'works or activities that any person has a statutory duty to undertake' - this does not tie into Schedule 1 section 5 and could lead to confusion. P10 – 8 (1) – clarity is required as to if this applies to accommodation based or/and floating support as it could apply to both. P17 – 3 (b) – whilst this definition has been used in previous conditions it still causes confusion. The problem is that service eligibility for care services is now dissected by FACs Financial Assessments and so care services may only be provided to a more limited group and those not eligible may require similar services which SP might cover in whole or in part depending on tasks concerned. In turn the SP services are limited by funding available and

	therefore can lead to accusations of unfairness. In general it would be better to put SP on a statutory basis to avoid possible future litigation under the Human Rights Act. **CLG's response** – amendments have been made where it has been deemed necessary.
Contact Compliance	**Suffolk** - In the Grant Conditions for non-excellent authorities we note the change from contract to agreement in clauses 4(1), 5(2) (d), and 8 (4) (a) and (b). We would welcome the flexibility to enter into negotiated agreements with providers in certain cases, but would expect to adhere to good practice principles based upon robust contract monitoring. **Oxfordshire** - We are perfectly happy with the changes to wordings which ensure current references to contracts will definitely cover service level agreements as well as contracts. **CLG's response** - The change from 'contract' to 'agreement' in the Grant Conditions, Directions and Guidance is in recognition of the fact that there exist a range of contractual arrangements which are entered into locally.
Use of grant monies and eligible expenditure	**Kent** – Would appreciate a more in depth explanation as to the purpose of point 4 in Annex B Eligible Expenditure. Regarding paragraph 5b – it is not always easy to clarify exactly what falls within statutory and non statutory duties in relation to some client groups, for example, a client with learning disability who requires health, social care and housing related support. Feel that there are 'grey areas' between social care and housing related support and housing management. Therefore when providers are trying to deliver services there is not always clarity between social care, which is statutory to those who are eligible, and housing related support and management which are not. Would be grateful if CLG could give clearer guidance on how it would expect AAs to determine such matters. **CLG's response** - Administering Authorities are responsible for developing local eligibility criteria which should be applied in determining service delivery to individuals.
Statement of grant usage	**East Riding** - The Authority provided details of actual expenditure for 2005/06 through the LOGASnet system in August 2006. In addition an extract from the Supporting People Local System (SPLS) was provided in May 2006. Clarity is sought on if CLG will require an additional financial return to be completed by Authorities for both 2006/07 and 2007/08? **CLG's reponse** – The grant conditions for each year make clear the requirements for reporting spend to CLG and authorities must present their data based on the requirements of the grant conditions.
Internal Audit	**Leicester** - The audit of the grant claim will be provided for in the Internal Audit operational plan. It does raise a question of principle in that the local authority's internal auditors are effectively being asked to perform an external audit function of a kind traditionally done by the Audit Commission. While the internal auditors will approach the task with absolute objectivity and all due professional care, they do face what could be taken as a conflict of

	interests. This arises in that their findings and any consequent qualification of the grant claim could then have adverse financial consequences for the local authority. The nature of Internal Audit's responsibility here needs to be clearly stated and be understood by all parties. There is also the need to ensure that Internal Audit is able to devote sufficient resources to the audit of the SP grant claim. Internal Audit must be able to do this without adversely affecting the level of coverage of other areas of risk and without adversely affecting the budgets of the SP service. There should therefore be sufficient provision within any administration element of the grant funding to cover the reasonable costs of the Internal Audit work. These would be quantified as part of the annual audit plan at the beginning of each financial year. **East Riding** - No formal audit return of financial information signed by our auditor for 2005/06 was required by CLG as the details where supplied through the LOGASnet system. Will a formal audit return be required for 2006/07 and 2007/08? **CLG's response** - The grant conditions for each year make clear the requirements for reporting spend to CLG and authorities must present their data based on the requirements of the grant conditions.
Further comments	**North Somerset** - it would help from a contractual point of view to have conditions which last for the length of funding. If the SP programme moves to three year funding from April 2007 then it would be of benefit if the conditions do as well. **Torbay** - Commissioning Body are happy with the new conditions for non-excellent authorities and feel they appropriately reflect the move from transitional arrangements to the delivery of the SP programme (and government restructure). **Stockton – on – Tees** - Reference to the word "Administering" authority has generally been removed from the Grant Conditions for Excellent authorities, however it remains in the text of Para 8b (Financial Control) (p10) - I assume this is not deliberate? Why does the non-excellent programme grant conditions document refer to "Administering Authorities" and yet the "Excellent authorities grant conditions document generally refers to only "authorities"? In the Non Excellent grant conditions document the front page (p1) does not make it clear that it refers to "non-excellent" authorities. This could be confusing if you only had access to the one document. In the non excellent grant conditions document Schedule 2 (Administering Authorities' Performance) (page 22) I would expect it to read Condition 7 not Condition 8 at the top right of the page. **Bolton** - The Bolton SP Commissioning Body welcome the opportunity to comment on next year's directions and grant conditions and having had a chance to consider the revisions we generally regard the new framework as

	giving adequate guidance for us to deliver our 5 Year Strategy objectives.