

Report to:	EXECUTIVE CABINET
Date:	24 March 2021
Executive Member:	Councillor Oliver Ryan, Executive Member for Finance and Growth
Reporting Officer:	Jayne Traverse, Director of Growth
Subject:	RE-OPENING HIGH STREETS FUND
Report Summary:	This report updates on the governments Re-Opening High Streets Fund and changes by central government to programme delivery timescales and eligibility criteria, which has resulted in the council having to update its Re-Opening High Streets Fund Delivery Plan (Appendix 1),
Recommendations:	<p>That Executive Cabinet be recommended to approve:</p> <ul style="list-style-type: none"> (i) the Grant Action Plan at appendix 1. (ii) any necessary funding variances on the activity detailed in the Grant Action Plan (Appendix 1), within the funding envelope of £0.201m, to ensure all the funding is spent before 30 June 2021. (iii) Entering into the necessary contracts to deliver the works detailed in the Grant Action Plan (Appendix 1).
Corporate Plan:	<p>The funding purpose aligns with the following Corporate Plan objectives:</p> <ol style="list-style-type: none"> 1. A sustainable environment that works for all; 2. Nurturing our communities; 3. Living healthier lives.
Policy Implications:	Whilst measures resulting from this fund will be temporary, they will support delivery of the Council's Draft Inclusive Growth Strategy and is in line with the Tameside Unitary Development Plan as identified under <i>(S1) Town Centre Improvement</i> in identifying and implementing improvements where necessary.
Financial Implications:	The report sets out details of the proposed expenditure via the Council's Re-Opening the High Street Safely funding allocation of £0.201m (table 2 refers). The deadline for the related expenditure via this grant has been recently extended to 30 June 2021.
(Authorised by the Section 151 Officer)	<p>The proposed expenditure also includes a contingency sum of £0.017m. Consideration should be given to the proposed use of this funding as it currently represents 8.5% of the grant allocation.</p> <p>It is essential that the proposed expenditure complies with the related grant conditions and is claimed in a timely manner. In addition it is also essential that appropriate advice is sought from STAR where appropriate to ensure compliance with procurement regulations and that value for money is achieved.</p>

Legal Implications

(authorised by the Borough Solicitor)

Members will recall that Cabinet that it has already considered the reopening of the high street fund and passed a number of resolutions in relation to the spending of the same.

However as set out in the main body of the report the criteria for the spending of the funding has changed.

As such the project officers wanted to return this matter to Cabinet in order to update Members and ensure that Cabinet are content with the change in focus.

As with all funding it is important that it is spent in accordance with the terms of the grant offer which can be achieved by robust contract management.

In addition whilst this is grant funding the requirement for Members to be content that the spend represents best value by considering the financial implications and the plans to spend the funding.

Risk Management:

The main risk to the project is to not agree a Grant Funding Agreement within the new timescale set by Government and therefore not receiving or delivering the funding to enable the delivery of the project.

Background Information:

Appendix 1	Opening Highstreets Safely Fund Grant Action Plan.
Appendix 2	COVID Ambassador guidance

The background papers relating to this report can be inspected by contacting Anne Heath, Economic Development Officer



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1. BACKGROUND

- 1.1 Tameside MBC was allocated £200,741 to re-open the high street safely (RHSS) in May 2020 by the Ministry for Housing Communities and Local Government (MHCLG). This report sets out Tameside MBC's revised plan to meet amended eligibility criteria and utilise all funding by 30 June 2021.
- 1.2 At the time of announcing the RHSS Programme, central government encouraged Council's to get on with drafting their delivery plans and accordingly, proposals were considered by Tameside Council's Executive Cabinet in August 2020. However in late September 2020, MHCLG appointed Contract Managers to liaise with Council's on their programmes and to provide advice on expenditure. The MHCLG Contract Manager was available from October 2020 and Councils' were advised they must prepare a formal Grant Action Plan (GAP), to be agreed by MHCLG. Once agreed, the GAP informs a Grant Funding Agreement (GFA) between Tameside MBC and MHCLG. In addition, throughout the remainder of 2020 and early 2021, central government has continued to make changes to eligibility criteria, which dictates what the funding can be spent on. This has meant most Councils' in England have not been able to spend the funding to date given the significant risk of incurring expenditure on activity later deemed by MHCLG to be ineligible for funding. In recognition of the delays the government's changes have had on Councils' formalising a compliant GAP, the government has extended the programme deadline from 31 March 2021 to 30 June 2021.
- 1.3 The Government Guidance for the funding originally covered four areas of eligible activity:
- a) Support to develop an action plan for how the local authority may begin to safely reopen their local economies;
 - b) Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely;
 - c) Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely;
 - d) Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.
- 1.4 There are also three main categories where activities cannot be supported:
- a) **Activity that provides no additionally** - This funding is intended to be additional funding on top of that existing activity;
 - b) **Capital expenditure** – This funding is intended to help local authorities address the short-term issue of re-opening their local economies. It can support some temporary changes to the physical environment, but those changes should not be anticipated to last beyond 12 months, or until no longer required for social distancing;
 - c) **Grants to businesses** – Funding cannot provide direct financial support to businesses to make adaptations to premises, purchase PPE, purchase goods or equipment or offset wages or other operating costs.
- 1.5 A public consultation was undertaken virtually to provide the opportunity for residents and businesses to provide views on the programme. The consultation also provided an opportunity for the community to assist in highlighting 'pinch points' that may require temporary alterations in order to allow social distancing to take place and none were raised. The consultation ran from the 3 August for 6 weeks ending on the 11 September 2020 and was accessed through the authority's website and had dedicated communications running alongside to raise awareness. In total, 278 responses were received. Table 1 sets out the findings and council responses.

Table 1 Consultation Feedback	
Finding	How we intend to respond
Overall view on town centre safety - 44% of those who responded thought that there was not enough signage and messaging in local town centres, whilst 40% thought there was enough.	Increased communication activity would support messaging around safety to reassure public on how to prevent the spread of Covid19 while utilising Town Centres. Ambassadors would provide ongoing dialogue and reassurance with the public and businesses.
Overall view on town centre safety - 16% were either not sure or had not been to a local town centre recently.	Increased communication activity would support messaging around safety to reassure public on how to prevent the spread of Covid19 while utilising Town Centres. This would aim to increase footfall.
Primary reason for residents not visiting town centres - Non adherence to guidance, lack of social distancing and non-use of face masks	Ambassadors would provide ongoing dialogue and reassurance with the public and businesses. Ambassadors could also provide additional intelligence for enforcement officers to combat non adherence to guidance.
Secondary reason for residents not visiting town centres - The appearance of no enforcement of the regulations in the town centres	Ambassadors would provide ongoing dialogue and reassurance with the public and businesses. Ambassadors could also provide additional intelligence for enforcement officers to combat non adherence to guidance.

- 1.6 Consultation has also taken place with local business owners including shopping centre management to inform of the allocation and to ensure that a co-ordinated approach could be undertaken. Members and the Chairs of the town teams were also contacted by the Executive Member for Finance and Economic Growth to brief them about the allocation, restrictions of the ERDF funding and the public consultation.
- 1.7 The Council has spent £2,723 to-date which is on communications activity, which is deemed eligible activity under the programme.
- 1.8 Section 2 sets out the governments changing parameters since the launch of the programme in 2020.

2. CENTRAL GOVERNMENT CHANGES TO THE RHSS PROGRAMME

- 2.1 At the time of the August 2020 Cabinet report, Covid 'Marshalls' and 'Ambassadors' were deemed ineligible for RHSS funding by MHCLG. That advice has recently changed and Ambassadors are now eligible for expenditure. Whilst Ambassadors cannot have enforcement powers this is a positive and welcomed additional resource and accordingly this activity has been added to the Council's GAP. Under current guidance, the Council can only appoint and pay any Ambassadors until 30 June 2021. It is proposed that 16 Ambassadors are employed on short term contracts, two in each of the six towns (Ashton, Hyde, Stalybridge, Denton, Droylsden and Mossley) and four available to be targeted flexibly based on intelligence and responding to need. The inclusion of the Ambassadors within the eligible costs of the allocation offers the opportunity to provide a tangible intervention when our high streets re-open fully and would potentially support the short term employment and skills development of 16 unemployed Tameside or Greater Manchester residents (the posts

must be new roles as per MHCLG guidance). A tailored recruitment with the Covid19 GM JETS programme delivered by Ingeus would be implemented, which supports rapid re-employment of those impacted by the recession. The Ambassadors would be trained and integrated into the Enforcement team in Operations and Neighbourhood to enable them to be deployed quickly within an existing operational structure. The Government has provided Guidelines on Ambassadors funded under the RHSS programme (Appendix 2.).

- 2.2 Footfall data and the associated cost were also not included in the original August Cabinet report due to lack of clarity from central government on eligibility under RHSS programme. MHCLG has now confirmed this can be included and government considers that they will provide effective monitoring, which will be a mandatory requirement in the Grant Funding Agreement. They will also help support Tameside's long term economic recovery by providing intelligence on footfall in town centres. It is proposed to install one counter in each of the six town locations (Ashton, Hyde, Stalybridge, Denton, Droylsden and Mossley).
- 2.3 The initial spend profile approved by Executive Cabinet in August 2020 included a small works programme of interventions in our towns to alleviate pinch points and help with social distancing. TMBC Engineers consider that these are no longer required due to 'pinch points' not occurring and based on our ongoing understanding of how the Pandemic has impacted our town centres. The public consultation also failed to identify any specific 'pinch points'. This area of spend has been removed from the proposals approved in August 2020.
- 2.4 The communication activity set out in 26 August 2020 Cabinet report remain the same, with the exception of high banners.

3. DELIVERY

- 3.1 Table 2 sets out the current areas of expenditure contained in the GAP (Appendix 1) and being actively worked on through constant dialogue with MHCLG. These areas of expenditure will form the Grant Funding Agreement between MHCLG and the council.

Table 2

Work areas		Cost (£)
1.	Public communications programme including local press inserts around latest guidance, banners around RHSS areas in town centres, floor stickers, boosted social media and radio slots. To inform and guide public on guidelines and legislation.	19,970
2.	Business Communications - leaflet on guidance and safety to all businesses at the end of current national lockdown	4,600
3.	Provision of 16 Ambassadors across the 6 towns covered by RHSS for 2.5 months. Costs based at grade F (SCP 17) including on-costs	106,130
4.	Footfall Counters 6 towns at £7,100 per town	42,600
5.	4% allowed staff cost allocation	7,720
6.	Already committed	2,723
7.	Contingency (related to all areas of spend)	16,998
Total		200,741

- 3.2 Table 3 sets out the timeline for the project based as we focus on agreeing, approving and delivering our allocated spend before the 30 June 2021 deadline. To meet deadlines we will need to put pre-work in place and agree the first draft GFA simultaneously to our Governance

process. No spend will be committed until Cabinet have approved the approach and the GFA has been received and completed.

Table 3

Timeline for delivery		
Date	Governance	Other Activity
February 2021	SLT 23 February 2021	GAP dialogue continued with MHCLG Pre-work on procurement with STAR Pre-work with HR on recruitment
March 2021	Living with COVID Board 17 March 2021 Exec Cabinet 24 March 2021 GFA sealed (end of March)	GAP endorsed and approved by all parties GFA received and approved by all parties Launch recruitment of Ambassadors Launch procurement of footfall counters
April 2021	Statutory Officers Panel end March 2021.	Ambassadors in post Mid April 2021.
May 2021	STAR / Director sign off April 2021	Footfall counters procured mid May 2021.
June 2021		30 June 2021 project ends no more spend eligible.

4. RISKS

4.1 Table 4 sets out the risks for this project and the mitigations in place.

Table 4

Project Risks			
Risk	Impact	Rating	Mitigation
1. The GFA is not agreed in time with MHCLG to deliver the identified areas of spend. The authority does not currently have the GFA that will be informed from by the GAP. Procurement and recruitment will need to be undertaken once a GFA is in place before spend can be incurred.	The project ends on 30 June 2021, not spending the allocation would be detrimental to our re-opening town centres approach and would cause reputational damage to the Local Authority.	Medium	Officers' are pursuing the completion of the GAP and GFA simultaneously to this updated report to enable maximum amount of time to deliver.
2. Local authorities can spend money on eligible activities from 1 st June 2020 and claim it back from MHCLG in arrears. All work has to be carried out at risk the funding agreement offers some protection but, grant applications submitted have to agree expenditure before reimbursement still have to be agreed and work could still be deemed ineligible if guidance	The authority will have to incur expenditure and then claim back. Any expenditure deemed ineligible by MHCLG would have to be paid for by the authority.	Medium	Advice has been sought from MHCLG on any items of expenditure where eligibility clarification is needed, therefore minimising the risk to the authority. The GFA provides formal clarity by MHCLG on eligible local spend once issued to the council.

changes			
3. All procurement should be awarded in line with the Public Contracts Regulations. In addition, all procurement exercises should therefore be carried out in an open and transparent way, an audit trail of the routes followed, and the process will need to be retained. Consideration should also be given to the latest CCS guidance notes in direct response to the COVID-19 crisis.	Procurement/recruitment rules are stringent as the funding is sourced through ERDF and the process can take 4 to 6 weeks to put in place this could prove a challenge given the time restraints currently in place	Medium	The risks and conditions of the procurement process will be carried out following STAR guidance and the quickest, compliant route to market used.
4. A number of records are required, under the terms of the project to be retained through the life of the project and for the relevant retention period. These include payroll records, bank statements and accounting records.	If evidence cannot be supplied in the requested format the expenditure may be deemed ineligible	Medium	Officers' will ensure no expenditure will be incurred which cannot be evidenced adequately. Officers' will work with MHCLG to seek on-going advice regarding evidence.
5. The use of the ERDF logo, which includes the emblem and reference to the Fund, and the requirements set on colour use, sizing, visibility and positioning must be followed. All electronic and print publication materials used for information and communications supported by the Fund including items connected with recruitment. Materials produced, project documentation, procurement materials and social media tools.	Failure to use correct logo's etc. will result in that activity becoming ineligible.	Low	All staff are aware of the regulations around the use of the ERDF logo etc. and all items procured, displayed, any social media used and recruitment documentation information will have the required logo's.

5 MONITORING REGULATORY REQUIREMENT & REPORTING

5.1 MHCLG will monitor the Council. This will include as a minimum some or all of the following measures:

- Checks on Local Authority systems and processes for retaining an audit trail;
- Spot checks on expenditure items included in claims.

5.2 Given the bespoke nature of this project there will be a need to provide some additional reporting requirements to evidence the outputs and outcomes of the investments being made. Prior to undertaking any actions, a baseline data set for future measurement should be acquired, in particular relating to the current footfall in the high streets. The costs of acquiring this baseline data, assuming it is not already available, can be covered as part of the costs associated with developing an action plan and is included in the GAP.

6 CONCLUSION

6.1 The RHSS programme will help with costs associated with the opening the high streets in line with current and future guidance on the Covid19 pandemic and help to 'build back better' Tameside's economic recovery following national and local lock-downs.

7 RECOMMENDATIONS

7.1 As set out at the front of the report.