

<b>DECISION TITLE: Household Support Fund</b>
<b>Councillor Steve Allen, Cabinet Member for Housing, Culture and Communities</b>
<b>ENTER MONTH IN WHICH DECISION IS BEING TAKEN - November 2021</b>
<b>Deadline date: November 2021 to allow the scheme to begin delivery</b>

Cabinet portfolio holder: Responsible Director:	Councillor Steve Allen, Cabinet Member for Housing, Culture and Communities  Adrian Chapman, Service Director – Communities and Partnerships
Is this a Key Decision?	YES If yes has it been included on the Forward Plan: No Urgency procedures invoked
Is this decision eligible for call-in?	NO
Does this Public report have any annex that contains exempt information?	NO
Is this a project and if so has it been registered on Verto?	NO

### RECOMMENDATIONS

The Cabinet Member is recommended to agree the following:

1. The design and delivery model for the Peterborough Household Support Fund, funded by the unallocated balance of the grant received from Government, namely £1,133,516 (from a total award of £1,824,636)
2. To delegate to the Service Director for Communities and Partnerships, the allocation of up to 10% of the total award (£182,463) to support administrative costs for the Fund and the resource costs of trusted partner organisations.
3. To waive the procurement process relating to the Household Support Fund as outlined in section 3.9.
4. To approve the procurement of services from Family Fund, Charis and AO as outlined in section 3.9.

## 1. PURPOSE OF THIS REPORT

- 1.1 This report is for the Cabinet Member for Housing, Culture and Community to consider exercising delegated authority under paragraph 3.4 of Part 3 of the constitution in accordance with the terms of their portfolio at paragraph (J)
- 1.2 With the approval of the Chairman of the Communities Scrutiny Committee, the urgency procedure, special urgency procedure, and waiver of call-in procedure have been invoked to suspend the requirement to publish notice of the decision for 28 days, to suspend the requirement to publish the decision for five days, and to suspend the three day call-in period.

As indicated below, the government published guidance regarding this scheme with a closing date of 31 March 2022.

There is an explicit requirement that any unspent funds at 31 March 2022 are returned to DWP.

The Council are anticipating a lot of Peterborough households will be in financial hardship during winter 2021/22 particularly in light of increasing prices for basic essentials such as food and fuel.

It is important that the Council get the scheme available as soon as possible to ensure that opportunities are maximised for households to access the support available.

## 2. TIMESCALES

Is this a Major Policy Item/Statutory Plan?	<b>NO</b>	If yes, date for Cabinet meeting	
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## 3. BACKGROUND AND KEY ISSUES

- 3.1 The Government has announced a new Household Support Fund to run from 6 October 2021 to 31 March 2022. The Fund is designed to support those most in need over the winter months.
- 3.2 The indicative funding allocation for Peterborough is £1,824,636. The funding will be paid to the city council, but we are encouraged to work closely with other partners to identify a broad range of vulnerable households across our area.
- 3.3 Awards must be based on the following framework, which is set out in the Guidance issued by the Government:
- i. At least 50% of the total funding will be ring-fenced to support households with children, with up to 50% of the total funding to other households genuinely in need of support this winter. This may include households not currently in receipt of Department of Work and Pensions (DWP) welfare benefits;
  - ii. Eligible spend includes:

- Food. The Fund should primarily be used to provide support with food whether in kind or through vouchers or cash.
- Energy and water. The Fund should also primarily be used to support with energy bills for any form of fuel that is used for the purpose of domestic heating, cooking or lighting, including oil or portable gas cylinders. It can also be used to support with water bills including for drinking, washing, cooking, and sanitary purposes and sewerage.
- Essentials linked to energy and water. The Fund can be used to provide support with essentials linked to energy and water (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.
- Wider essentials. The Fund can be used to support with wider essential needs not linked to energy and water should Authorities consider this appropriate in their area. These may include, but are not limited to, support with other bills including broadband or phone bills, clothing, and essential transport-related costs such as repairing a car, buying a bicycle or paying for fuel. This list is not exhaustive.
- Housing Costs. In exceptional cases of genuine emergency where existing housing support schemes do not meet this exceptional need, the Fund can be used to support housing costs. Where eligible, ongoing housing support for rent must be provided through the housing cost element of Universal Credit (UC) and Housing Benefit (HB) rather than the Household Support Fund. In addition, eligibility for Discretionary Housing Payments (DHPs) must first be considered before emergency housing support is offered through the Household Support Fund. The Authority must also first consider whether the claimant is at statutory risk of homelessness and therefore owed a duty of support through the Homelessness Prevention Grant (HPG).
  - In exceptional cases of genuine emergency, households in receipt of HB, UC, or DHPs can still receive housing cost support through the Household Support Fund if it is deemed necessary by their Authority. However, the Fund should not be used to provide housing support on an ongoing basis or to support unsustainable tenancies.
  - Individuals in receipt of some other form of housing support could still qualify for the other elements of the Household Support Fund, such as food, energy, water, essentials linked to energy and water and wider essentials.
  - The Fund cannot be used to provide mortgage support, though homeowners could still qualify for the other elements of the Fund (such as food, energy, water, essentials linked to energy and water and wider essentials). Where a homeowner is having difficulty with their mortgage payments, they should contact their lender as soon as possible to discuss their circumstances as lenders will have a set procedure to assist.
  - The Fund can exceptionally and in genuine emergency be used to provide support for historic rent arrears built up prior to an existing benefit claim for households already in receipt of Universal Credit and Housing Benefit. This is because these arrears are excluded from the criteria for Discretionary Housing Payments. However, support with rent arrears is not the primary intent of the fund and should not be the focus of spend.
- Reasonable administrative 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

- iii. Eligible spend does not include:
    - o Advice services such as debt advice;
    - o Mortgage costs.
  - iv. It is expected that the focus of support should be on food and bills and that support for housing costs should only be given in exceptional cases of genuine emergency. Beyond this, Authorities have discretion to determine the most appropriate scheme for their area, based on their understanding of local need and with due regard to equality considerations.
  - v. Individual awards can be whatever type and amount is deemed appropriate by Authorities for the receiving household, bearing in mind the overall spend eligibility priorities listed above and the risk of fraud and error. Awards to any given household can cover only one of the spend eligibility categories listed above or can cover several.
  - vi. Authorities should not make Household Support Fund eligibility conditional on being employed or self-employed, or directly linked to a loss of earnings from employment or self-employment. This will ensure that there is no National Insurance Contribution liability payable on any payments by either the claimant, the Authority or employer.
- 3.4 Members have approved the recommendation to operate a Direct Voucher Scheme for eligible families over the October half-term, Christmas school holiday, and February half-term periods. The funding allocation for the Direct Voucher Scheme approved was £691,120 leaving a Fund balance of £1,133,516 to support households as part of a wider scheme and meet administrative costs to support the scheme.
- 3.5 This report therefore sets out detailed proposals for the design and implementation of the wider scheme to be funded by the £1,133,516 total Fund balance.
- 3.6 Peterborough Household Support Fund
- 3.6.1 Our proposed scheme – the Peterborough Household Support Fund – is based on a number of principles:
- That the scheme is simple to understand and to access, given that it is designed to support households in urgent need
  - That it is delivered with as little bureaucracy as possible, to ensure as much of the funding as possible reaches vulnerable households
  - That we establish as many application routes as possible, and publicise it widely, so that anybody in need can seek support
  - That we work creatively to identify potentially vulnerable households that might not yet be known to services, and find ways of reaching out to them to offer support
  - That we continue to work in absolute collaboration with our partners across the public and voluntary sectors to reach as many households as possible, but to also make sure that ongoing support, where required, is available for households beyond that which can be provided by this Fund
  - That households can apply for support as many times as necessary, but that from the third application we will make direct contact with the household to have a broader discussion about need in order to seek to address the underlying causes of that need
- 3.6.2 The Fund is designed to support any household in urgent need of help. Eligibility criteria is a matter of local choice, with the guidance stating that 'Authorities have the flexibility within the scheme to identify which vulnerable households are most in need of support and apply their own discretion when identifying eligibility'. The guidance goes on to say

that there is no requirement for authorities to undertake a means test or conduct a benefits check unless we choose to include that in our criteria.

3.6.3 Although we want to implement a scheme that offers support to as many households in urgent need as possible, we also need to ensure the funding available lasts for the duration of the scheme. We are anticipating a significant number of applications for urgent financial help from households across Peterborough, likely to be several thousand. We therefore need to strike the right balance between establishing eligibility criteria and delivering an efficient scheme that can help households in urgent and immediate need.

3.6.4 We propose that for awards with a financial value equivalent to £50 or less (per voucher or resolution), applicants will be required to provide evidence of low or no income (via written evidence or a discussion with our team or a Trusted Partner (section 4.5.2 refers)).

The latest reporting from the Office for National Statistics shows that median household income in the UK is £29,900. A household is currently defined as being in poverty where their total household income is less than 60 per cent of this average, equating therefore to £17,940. We are therefore proposing to use this figure to set the eligibility threshold but apply it to every applicant in the household rather than the household in its entirety. This means that, if the applicant/s each earn £17,940 or less, they are eligible to apply to the fund. This helps to support both single people as well as whole families.

For awards with a financial value equivalent to £50.01 and above, applicants must be in receipt of one or more of the following:

- Income Support
- Income-based Job Seekers Allowance
- Income-related Employment and Support Allowance
- Pension Credit
- Universal Credit
- Working Tax Credit

Or, if all or part of the household is working, the total income for each applicant must be below the low-income threshold described above.

3.6.5 We will be able to quickly validate eligibility based on receipt of benefits via access to the DWP database specifically made available under the terms of this Fund. To evidence low income, we will request sight of payslips or other evidence.

In exceptional circumstances (for example, for people without payslips or who haven't yet applied for benefits) we will exercise appropriate discretion.

Note that the recommendation is **not** to limit access to the Fund for people who have lived for less than six months in Peterborough. Doing so may restrict access to the Fund for some of the most vulnerable households, including more recent refugees, victims of domestic abuse who have fled their home area, or people who have relocated to take up work or learning. (The guidance allows Authorities to use the Fund to provide basic safety net support to individuals with no recourse to public funds if there is a genuine care need that does not arise solely from destitution. Individuals with no recourse to public funds will be able to access the Fund but will need to have a conversation with our team or a Trusted Partner to establish this).

3.6.6 In our proposed scheme there will be two primary routes for households to get the support they need: a direct application process, and support facilitated via a trusted partner network.

3.6.7 *Direct Applications*

A simple, intuitive application form will be available via the council's web site which households can use to request the support they need. For households without internet access, or who might need help completing the form, a telephone hotline will also be available. We will make sure the application form is available in different languages and formats.

From our previous experience, and in line with the Fund rules, we anticipate that for the majority of the applications received the process to assess the application and make the award will be rapid, and we will set a standard of either making the decision or referring back to the applicant where more detail is required by the end of the working day following receipt of the application.

Households that need a food, fuel or essential supplies voucher should then receive that voucher within an average of 2-3 working days beyond that. For other remedies, delivery will be dependent on the item or service required, but we will maintain frequent contact with the applicant to ensure they are kept fully informed of progress. All applicants, whether successful or not, will also be sent an information pack setting out options for support beyond the Fund itself including details of other forms of ongoing support as well as details of other sources of funding that they may be able to access. Wherever possible, we will make direct referrals into other schemes on behalf of the applicant with their permission.

#### 3.6.8 *Trusted Partner Network*

A successful feature of previous recent funding schemes has been the development of a trusted partner network comprising a range of organisations that are already in touch with or supporting people who might be in urgent need of support, or who are locally available to households who might go to them for help. At present, this network consists of:

- Citizen's Advice Peterborough
- Kingsgate Church (including the Foodbank network and Carezone)
- Cross Keys Housing
- Care Network
- Barnardo's

Prior to being agreed as a trusted partner, Peterborough City Covid Hub team carry out necessary checks to ensure suitability, good governance and good decision-making arrangements are in place.

In this model, the trusted partner network has been able to consider a financial award to vulnerable households as part of their broader toolkit of support. Network organisations have been briefed on eligibility criteria and funding conditions and are trusted to make decisions on whether or not an award should be made. In the event that an award is deemed to be the right solution, the trusted partner organisation submits details to the council and the required solution is processed.

We propose to both continue and expand this model, to ensure that as many opportunities as possible are available to households. To support the work of these agencies we are proposing allocating **up to 5%** of the funding in scope to groups that present a need, for example, to help them increase their staffing capacity. The Cabinet Member is asked to approve the delegation of this allocation to the Service Director for Communities and Partnerships.

#### 3.6.9 Beyond these two main forms of accessing support from the Fund, it is also important that we use our best endeavours to identify households who may be eligible for and need urgent help and support. There will be many households who are facing financial hardship

for the first time, for example as a result of the impacts of the pandemic or because of the rise in household utility costs. These households may not know how to access the support they are entitled to or may be embarrassed to seek out that help themselves. Others may be facing turmoil in their lives and not able to pause to seek the sort of help the Fund might offer.

- 3.6.10 We will therefore be developing and agreeing appropriate data sharing arrangements between council departments and other agencies, enabling us to search across multiple databases to identify households that might fall into this category. Recent council tax debt or rent arrears might signal immediate financial pressure for example, enabling us to target our support towards those households.
- 3.6.11 City Councillors too play a vital role in helping to ensure the Fund reaches households in urgent and immediate need. This might include promoting the Fund to local residents and community organisations, signposting households to apply to the Fund, supporting households to practically apply to the Fund, and providing local intelligence to the Fund's administrative team to enable them to target communications and engagement activity where it is needed.
- 3.6.12 This approach will also ensure we identify and/or target support towards vulnerable people via our other services, including for example, victims of domestic abuse, asylum seekers, and people who are homeless.

### 3.7 Practical Support Arrangements

3.7.1 As described in section 1 of this report, there is a range of practical support that can be funded through this Fund (food, fuel, essential supplies etc). We have developed the arrangements necessary to provide immediate support for all eventualities, and these are described in more detail below. The arrangements described will be deployed regardless of application route.

#### 3.7.2 *Food*

A supermarket voucher will be issued to a household, with a value of £25 for a single person and £50 for a couple or family. We propose to use two providers for this part of the scheme, which broadens out the availability of supermarkets who will accept the vouchers.

#### 3.7.3 *Fuel and Water*

Applicants seeking financial help with household energy and water bills will either pay their bills on demand, pay via direct debit, or pay as they use via a pre-payment meter. Many households also heat their homes using oil, and some use gas from containers.

- Where there is an urgent need, we will provide those on pre-payment meters with vouchers which can be redeemed at a Paypoint terminal and which tops up a pre-payment card. The value of these vouchers is currently capped by the provider at £49 and so we propose the value is £28 for a single applicant and £49 for a family.
- For households who pay via direct debit or on-demand, we will provide payment direct to the energy or water supplier via a BACS transfer. The amount of financial help needed to satisfy the urgent need criteria will be capped at the same level as the pre-payment vouchers. Where the request for urgent support exceeds this amount a more detailed assessment of need will be undertaken.
- The nature of the domestic oil and cylinder gas market means that £49 may be insufficient to secure a fuel delivery for those in need. We therefore do not propose a cap for this group. For households who need financial help to supply

oil or gas in containers, we will assess the amount of financial help needed to satisfy the urgent need criteria, and credit that amount direct to the oil or gas supplier via a BACS transfer.

#### 3.7.4 *Other Household Energy and Water Costs*

The Fund is able to support households with urgent repair costs relating to household energy and water, including boiler repairs and plumbing issues. We propose to access contractor support via established frameworks used by local authority Home Improvement Agencies wherever possible. We will pay the contractor direct on completion of the works via BACS transfer.

#### 3.7.5 *Furniture and White Goods*

For households needing replacement white goods or furniture to satisfy an urgent need, we will arrange for the direct supply of the item/s from a pre-determined list. This list of items is based on nationally negotiated rates meaning we benefit from significant economies of scale.

#### 3.7.6 *Clothing, Blankets, Towels etc*

Some items of clothing, as well as blankets, bedding and towels, are available from the pre-determined list referred to above. Where this is the case, we will arrange for that item to be supplied direct to the applicant. Where this isn't available, we will issue either a supermarket voucher (if the item is available in supermarkets) or an alternative high street shopping voucher.

#### 3.7.7 *Other Circumstances*

There will be some circumstances where our pre-arranged solutions will not work – for example, where there are requests for specialist equipment, or where a household is so isolated or housebound that a voucher alone will not meet the urgent need. In these circumstances, we will do all we can to arrange for the direct supply of an item or service. Ultimately though, we do have the capability to issue a voucher which can be redeemed for cash, or to make BACS transfers direct to an applicant's bank account and, whilst this provides reassurance that every identified need can be met through the Fund, this solution will be deployed in exceptional cases only, and following our efforts to identify an alternative solution within our broader networks.

### 3.8 Delivering the Peterborough Household Support Fund

3.8.1 We have explored and discounted the outsourcing of the administration and delivery of the Fund, for two primary reasons: (i) cost; it is likely that a provider would require at least 10% of the value of the fund to meet their costs, and (ii) speed; we are anxious to establish the Fund and to open up applications as swiftly as possible.

3.8.2 We are therefore recommending that we run the scheme in-house, via the Countywide Covid Coordination Hub. We will need to increase the capacity of the Hub team but can do so swiftly via a combination of agency staffing, redeployments and offering part time staff additional hours. We will seek to minimise the admin costs of the scheme, ensuring the maximum amount of support is directed to those in need.

3.8.3 One of the significant benefits of this approach, aside from cost and expediency, is that the coordination hub continues to work alongside a wide range of other agencies and has access to other forms of help and support. It will enable us to gather and retain in-house information about applicants so that we can, with their permission, identify other forms of help from across council services and wider partners.

3.8.4 Communicating the scheme widely and across multiple domains will be essential to help ensure as many people in urgent need as possible can apply. We anticipate being able to identify potential households in need via the approach to analysing data described earlier

in this report, but we also need households to be able to seek out and apply for the help they need themselves, either via our trusted partner network or via a direct application to the council. This will help those households feel in control.

3.8.5 Communicating the Fund in different, dynamic and accessible ways is therefore critical. We will:

- Rapidly develop and implement a communications strategy and action plan to ensure consistency and regularity of messaging, frequently refreshed and renewed, and themed where necessary (e.g., messaging aligned to post-Christmas debt)
- Produce communications content (printed and digital) in multiple languages
- Ensure the application form is available in multiple languages and formats
- Extend the arrangements the countywide hub already has in place to support people by telephone for whom English is a second language
- Ensure our Think Communities staff team are fully briefed on the Fund so that they and all those they work alongside are promoting the scheme and supporting eligible households at every opportunity
- Secure the support of our key partnership networks to promote the Fund, including via schools, childcare and early years settings, the Community Resilience Group and parish councils
- Work with our own internal colleagues to ensure we target our communications at households they support, including carers, young carers, care leavers, older people, those with a learning disability, victims of domestic abuse, homeless people, Gypsies and Travellers, council and social housing tenants at risk of homelessness, asylum seekers and refugees

3.8.6 Alongside a proportion of staffing costs to support this work, we will need to set aside a small communications budget to fund, for example, printed materials, translations, and social media content. We will again minimise the cost impact on the overall value of the scheme.

3.9 Procurement Exemption Request

3.9.1 To enable the Fund to launch and be delivered within the funding period, we are requesting approval to waive the procurement requirements to:

- Complete a full procurement process and the associated timescales
- Advertise the tender
- Gain at least three tender responses

The specification for a provider includes:

- Being able to choose vouchers and provide them to individuals or households according to their needs
- Being able to bulk purchase specific amounts of vouchers
- Being able to provide vouchers for supermarkets, gas and electricity top ups, Paypoint Cash Out vouchers, white goods and high street vouchers
- Being able to support BACS transfers to both individuals and companies
- Automating the allocation of purchased vouchers to individuals
- Having a reporting arrangement that means we can track expenditure and recoup any unspent vouchers

3.9.2 An informal market review has been completed with several provider options including Wonde and Charis being considered and decided against as they were not able to completely fulfil the specification. Family Fund were the only provider in the informal market review that completely met the specification and so the request is to be able to directly award a contract to Family Fund.

3.9.3 An exemption from complying with the standard procurement process is therefore requested on the grounds that the Government timescales do not allow for the work to be undertaken and would result in non delivery of the fund. The Household Support Fund has a requirement for the Fund to operate until 31 March 2022. This does not allow sufficient time for a compliant procurement process at this value.

3.9.4 We are also requesting waivers to directly procure services from two other providers – Charis and AO.

Following the informal market review, Charis were, after Family Fund, the provider most able to fulfil the specification. They also have the advantage of being a local provider. It is critically important that we are able to continue operations regarding the Household Support Fund throughout the whole period and so we are looking to award a contract to Charis to allow us to use their services in the event of a service outage from our primary provider. Given the Household Support Fund is being delivered across the country, we are anticipating our primary provider, Family Fund, to experience a significant and rapid increase in demand for their services over the next 5 months. While they are assured that they will be able to manage this, it is in our interest to ensure we have a contingency plan in place.

3.9.5 We also undertook an informal market review particularly relating to the procurement of white goods, in anticipation of a reasonable amount of demand for white goods via this fund. As part of that review, we identified that specifically the white goods aspect of the Family Fund offer was not commercially competitive with other providers and AO offered the per item value for money. We weighed the benefit of reduced administration costs by running all aspects of the scheme through a single provider against the per item cost saving offered by using AO as a separate provider for the white goods aspect of the scheme and felt it was worthwhile separating the white good aspect of the scheme out.

3.9.6 The requested waiver amounts for the three providers to the end of March 2022 are:

Family Fund	£850k
Charis	£75k
AO	£150k

The specific spend with the providers will be monitored throughout the six months to ensure we do not go over the limits above. The actual spend may end up being lower than the figures included above as there are some details of the schemes still being refined.

#### **4. CONSULTATION**

4.1 Views have been sought from a range of voluntary and third party organisations on how best to meet the needs of vulnerable people over the winter months. The proposed model is informed by the ongoing learning and feedback we have received through the previous Winter Grant Scheme and Covid Local Support Scheme. The limited timescales we have been required to work to have meant that wider consultation is not possible.

#### **5. ANTICIPATED OUTCOMES OR IMPACT**

5.1 The fund will help the council to support some of the most vulnerable people manage the challenges of rising fuel bills and other financial pressures over the winter months. This will help to prevent poor physical and mental health, reduce debt and financial crisis from development.

#### **6. REASON FOR THE RECOMMENDATION**

- 6.1 The council has been awarded the funded by Government with a strict set of criteria on how funding can be spent. The scheme proposed is based upon similar schemes delivered by the council over the last year in response to the challenges faced by communities in dealing with the impacts of Covid. Families are also faced with rising fuel and food costs whilst continuing to recover from the consequences of Covid and the effect that has had on the local and national economy.

## **7. ALTERNATIVE OPTIONS CONSIDERED**

- 7.1 Alternative models of delivery have been set out in the report. There is always the option of not delivering the support fund, however this would have a significant and detrimental impact on individuals and families across Peterborough as they struggle with increased costs this winter.

## **8. IMPLICATIONS**

### **Financial Implications**

- 8.1 The report above sets out details of significant implications in section 3 and section 4.7. Funding for the scheme is fully provided by way of Government grant. Any unspent grant by 31<sup>st</sup> March 2022, must be returned to Government.

### **Legal Implications**

- 8.2 The scheme will be delivered in accordance with the funding instruction issued to local authorities by Government.

### **Equalities Implications**

- 8.3 It will be important that the Fund is made widely available to any and all households who may be in immediate or urgent need. The report describes ways in which the Fund will be made available to households, and section 4.7 describes the work we will do to ensure the Fund is available to people in multiple languages and formats.

### **Carbon Impact Assessment**

- 8.4 There is unlikely to be any impact as a direct result of this Fund, although we will be seeking to support households into more efficient and greener energy deals as a broader benefit.

## **9. DECLARATIONS / CONFLICTS OF INTEREST & DISPENSATIONS GRANTED**

- 9.1 There are none.

## **10. BACKGROUND DOCUMENTS**

Used to prepare this report, in accordance with the Local Government (Access to Information) Act 1985) and The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

- 10.1 "Household Support Fund: – Guidance for County Councils and Unitary Authorities in England", *DWP 6 October 2021*

"Household Support Fund Grant Determination 2021 No 31", *DWP 6 October 2021*

## **11. APPENDICES**

- 11.1 None

