

Community Led Housing Enabler Hub Grant Programme Guidance



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This grant programme is funded by





1. Background to the Enabler Hub Grants Programme

- This funding programme has been established by Community Led Homes, which exists to make community led housing a mainstream housing option. We provide training, funding and practical support to local groups, councils and developers. By bringing people together from the grassroots to those in power, communities can create the homes they want and need. Community Led Homes is run by four leading community led housing organisations: Confederation of Co-operative Housing, Locality, National Community Land Trust Network and UK Cohousing.
- 2. This grants programme is funded by the Ministry of Housing, Communities and Local Government through the Community Housing Fund.
- 3. For the purpose of this project, community led housing is defined as follows:
 - a. there is meaningful community engagement and consent occurs throughout the process. The community does not necessarily have to initiate and manage the development process, or build the homes themselves, though some may do;
 - b. the local community group or organisation owns, manages or stewards the homes and in a manner of their choosing, and this may be done through a mutually supported arrangement with a Registered Provider that owns the freehold or leasehold for the property; and
 - c. the benefits to the local area and/or specified community must be clearly defined and legally protected in perpetuity.
- 4. The Community Housing Fund aims to support an increase in housing supply in England by increasing the number of additional homes delivered by the community led housing sector; to provide housing that is affordable at local income levels and remains so in perpetuity; and to deliver a lasting legacy for the community led housing sector in the form of an effective and financially self-sustaining body of expertise within the house building industry in England.
- 5. Enabler Hubs meet the third aim, by providing expertise to community led housing groups and connected stakeholders that enables the delivery of



projects, and with a business model that can be financially self-sustaining¹.

- 6. The primary aim of this grant programme is to expand the network of Enabler Hubs regional organisations supporting community led housing groups to deliver projects, particularly those likely to bid to Homes England or the Greater London Authority (GLA) for the Community Housing Fund. A secondary aim is to support the wider stakeholder engagement required to create a supportive local environment for community led housing (such as engaging local authorities and housing associations) and to stimulate the creation of new groups and projects. It is expected that Enabler Hubs devise a business plan that can sustain their primary activity (advising groups) through income generating activities beyond this grant.
- 7. For the sector, a broader aim of this programme is to establish 100% coverage of Enabler Hubs across England, providing enabler and other services to all forms of community led housing.

¹ See Power to Change's working paper for an explanation of their functions and business models: https://www.powertochange.org.uk/research/9652/



2. Other support programmes available to groups

8. Community Led Homes is also running two small grants programmes which will complement the work of Enabler Hubs, and the funding available through Homes England and the GLA.

Community Led Homes Start Up Support Programme

- 9. The Start Up Support Programme aims to help groups of local people to develop their own community led housing solutions. The grant programme is targeted to support the earliest stages of a community led housing group's development and help community led housing projects at an early stage to explore options, to enable community led housing solutions to become a reality.
- 10. This grant has two elements. Firstly 'Support Grants' provide access to technical advice and support to community led housing groups that cannot obtain this support from an Enabler Hub, worth up to £6,000.
- 11. This may be because there is no Enabler Hub operating in their area, the hub is still developing its service offer or because a local Enabler Hub has reasonably taken the view that the group is at too early a stage, or taking too risky and uncertain an approach, to qualify for support at no up-front cost. It may also provide for other early support work in areas that fall outside the skillset of an Enabler Hub and that cannot be funded by Homes England and GLA revenue grants, such as early community organising work to establish the group's membership and objectives.
- 12. When groups apply for these grants, checks will be made to see what support is provided by an Enabler Hub to determine if their application is eligible.
- 13. Secondly there is a 'Seed Corn Grant' up to £4,000, which is available to all community led housing groups across England who meet the programme criteria, including those supported by Enabler Hubs.



- 14. All community led housing groups will incur costs during their early stages of a group and a project's development. Examples include community engagement costs such as room hire, volunteer expenses, legal fees to incorporate or review a current legal structure, costs of training courses, travel costs to see other community led housing projects and costs of site surveys.
- 15. Groups can use the Start Up Support Programme to get to a point where they are able to bid to the Homes England and GLA grant programmes.

Becoming a Registered Provider/ Investment Partner Programme

- 16. This programme provides grants to cover the costs incurred by groups that wish to register as an Investment Partner (IP) with Homes England, and/or a Registered Provider (RP) with the Regulator for Social Housing. These costs may include specialist support from a community led housing advisor to help them through the process, staff costs to undertake the preparation work and, in the case of RP status, a £2,500 registration fee. These costs cannot be recovered from Homes England or GLA revenue grants.
- 17. We expect that Enabler Hubs may provide some or all of this support, or that they will help community led housing groups to obtain specialist support. To avoid double funding, where groups apply for funding for this work to cover costs including those of their Enabler Hub, checks will be made to ensure that these costs aren't covered in your application for an Enabler Hub Grant.



3. Funding available for Enabler Hubs

- 18. The total funding available in this programme is £2.6 million.
- 19. The programme is offering 'Development Grants' up to £50,000 and 'Full Grants' up to £150,000.
- 20. Enabler Hubs may apply for a maximum of £150,000, including both the Development and Full grants. For example, you may apply for a £50,000 Development Grant, and then up to £100,000 for a Full Grant.
- 21. We will seek to allocate funding fully and fairly, but there is potential for overspend and uncertainty as to likely eligible demand. Successful applicants may be invited to apply for further funding in the autumn of 2019 if the programme is forecast to underspend, and/or if the Government commits further funding to the programme.
- 22. Applicants do not need to secure match funding or have income generation in place during the grant spend period, however for Full Grant applications, applicants will need to provide a 3-year forecast showing how enabler hub services will be sustained beyond the life of the grant.

How long is the funding available?

23. The fund will remain open to applications from April 2019 until 31 December 2019. Enabler Hubs must spend any monies awarded by March 2021, and complete reporting requirements by September 2021.

Development Grants

24. If you are setting up a new Enabler Hub in your region, you may require grant funding to undertake stakeholder engagement, research local opportunities for community led housing and barriers to delivery, develop partnerships that will support delivery, design and trial a sustainable Enabler Hub service model, and set the Enabler Hub up including costs such as legal advice and fees. We would expect this work to last up to 6 months.



- 25. By the end of that period we would expect you to have developed a business plan and to be in a position to apply for a Full Grant.
- 26. We recommend that you read the <u>Power to Change research on Enabler Hubs</u> and use support from Community Led Homes to focus your work during the Development Grant period. While every hub will take a slightly different approach, the core principles identified in that research will apply to all Enabler Hubs and you will save time and money by applying their recommendations rather than imagining your case is unique.
- 27. If you are in the process of establishing a new Enabler Hub which is not yet incorporated, then you will need a fundholder to act as an accountable body to hold the grant for you.
- 28. The fundholder generally takes responsibility for the legal and financial management of a grant given to a particular project. The fundholder will receive the funding from the programme, will hold and administer grant funds on behalf of unincorporated groups or a consortium of groups and is legally responsible for the proper use and management of those funds. The fundholder will hold any grant monies it receives and will act on instructions given by the Enabler Hub delivering the project so long as they are in line with the Grant Offer.
- 29. The fundholder must be:
 - an incorporated legal entity.
 - solvent and have proven competence and experience in administration and financial management.
 - able to monitor project performance and submit quarterly reports to Community Led Homes.

Full Grants

- 30. You will be ready to apply for a Full Grant if you have developed a sustainable business plan and are either ready to, or are already, supporting community led housing groups to deliver projects.
- 31. The purpose of a Full Grant is to help cover the costs of this work up to March 2021.
- 32. The intention is that this will forward-fund activities that generate income, which you use to fund future work. For example, you might use the grant to



help five groups deliver projects, and charge fees for that work at the points when the project achieves planning permission, start on site and completion. These fees will then fund your work on further projects, without recourse to further Enabler Hub grants. Alternatively, you might support the development of projects from which you will obtain ongoing management fees, or which result in the Enabler Hub owning an asset from which you gain an income. This grant may also fund the strategic work required to develop other local funding sources beyond March 2021.

33. The purpose of Full Grants is *not* to grant fund Enabler Hubs that have no future plans for income. Bids that show an over-dependence on grant will not be successful.

Programme Deliverables

- 34. In return for the Development Grant and Full Grant funding, Enablers will need to set out how they will achieve a number of key activities and outputs:
 - Enablers will need to develop a pool of community led housing advisors to provide advice to groups across the spectrum of community led housing approaches.
 - Enablers will need to report on the number of hours of advisor time that will be provided to groups.
 - Enablers will need to report on the number of community groups supported.
 - Enablers will need to deliver local promotional events to develop the local sector and record the number of attendees.
 - Enablers will need to engage with local authorities at the level of senior officers and/or cabinet members and report back on progress to develop more supportive operating environments.



4. What the grants can, and can't, be spent on

- 35. The following are examples of costs that you can spend this grant on:
 - a. Staff time or independent consultant's time to undertake stakeholder engagement, partnership development, research and business planning.
 - b. Delivering 1:1 support to community led housing groups through staff time and/or a pool of associate advisors.
 - c. Promotional activities events, advertising, printing, website development.
 - d. Office costs.
 - e. Room hire.
 - f. Volunteer expenses.
 - g. Training courses and conferences for staff and advisors that complement and add value to the Community Led Homes community led housing advisor training programme.
 - h. Legal advice and fees, e.g. to incorporate a new Enabler Hub
 - i. Travel expenses for staff, board members and advisors
- 36. The following are examples of ineligible expenditure:
 - a. Work that has already secured funded through another grant programme (for example, the Community Led Homes' 'Start Up Support Programme', Community Led Homes 'Becoming an Registered Provider/ Investment Partner Programme', Home's England's Community Housing Fund revenue grants to groups, Local Authority funded community led housing support programmes, national charitable grant programmes provided by funders (such as Power to Change and Nationwide Foundation). Note that this does not include fees capitalised in projects funded in part by the above. These would be seen as match funding for this programme.
 - b. Any activities of a political or exclusively religious nature, particularly those that influence or to attempt to influence Parliament, Government or political parties.
 - c. Retrospective costs.
 - d. Staff time for activities not associated with the Enabler Hub.
 - e. Capital costs over £1000.
 - f. Training courses and conferences for staff and advisors that do not complement and add value to the Community Led Homes community led



housing advisor training programme.

- 37. The application form asks you to set out the number of groups you will work with using this funding and the number of hours of support you intend to deliver. This can include groups you do not yet have funding to support. It can also include groups you are already working with, where you lack sufficient funding to support them to complete their projects. You should not doublefund work with this grant and other sources of income.
- 38. However, to understand your business plan we would ask that you include all projects in your pipeline analysis, including those not to be funded by this grant.



5. Eligibility criteria

39. Applicants should demonstrate in their Development Grant application form and, if applying for a Full Grant, in their business plan, how they intend to meet the following criteria.

The Enabler Hub will operate in England

40. Organisations applying must be incorporated in, and operated in, England. Funding may only be used for activities undertaken in England.

The Enabler Hub will provide advice on all forms of community led housing

- 41. We will only support Enabler Hubs that are committed to providing impartial advice on all forms of community led housing, and all routes to delivery, helping groups to choose the approach most appropriate to their circumstances and aims. This should include:
 - a. Cohousing, co-operatives, community land trusts, tenant management organisations and hybrid forms.
 - b. Self-build, custom build, commissioning builders, working with partner developers and housing associations, renovation of empty properties, and the purchase of properties including through Section 106 agreements.
 - c. Projects initiated by new groups, by existing community organisations, and by developers, councils and housing associations.
- 42. We do not expect Enabler Hubs to have equivalent or full skills and experience in all the above approaches, nor to provide identical levels of support to each. We recognise that projects will vary in their support needs and risks, and that Enabler Hubs may make reasonable judgements about the amount of free, "atrisk" support work they can provide to each project. But we do expect that Hubs are able to provide and source initial and appropriate advice, and that they aim to provide a reasonable level of support to all groups regardless of their chosen approach.



The Enabler Hub must be established for a charitable, benevolent or philanthropic purpose

- 43. The organisations selected to receive grants will normally be not-for-profit either due to their structure (such as Community Benefit Societies, Community Interest Companies), or because of the way in which they are run, reinvesting all or most of their surplus into delivering their charitable, benevolent or philanthropic purpose (see Appendix 1). This <u>does not</u> mean that you have to be a charity as we will fund a variety of legal structures, but we cannot fund projects that don't further a charitable, benevolent or philanthropic purpose.
- 44. Enabler Hubs must provide support with these grants to community led housing groups delivering charitable, benevolent or philanthropic purposes.

The Enabler Hub will be an independent entity with its own governance arrangements and ring-fenced funding

- 45. Enabler Hubs should be independent legal entities or have due independence from the host organisation. They should not be controlled by any one organisation with potential conflicts of interest, or that might fetter its ability to give impartial advice to groups. We do not generally encourage Hubs to be hosted by Local Authorities.
- 46. Enabler Hubs might form from a consortium of existing organisations. A new legal entity can be established for this consortium and apply for funding, or one of the partner organisations can choose to be the fundholder for the consortium.

The Enabler Hub will operate across a geographical area without significant overlap with another recognised Enabler Hub

47. We will only award grants to one Enabler Hub for any geographic area. In some circumstances, Enabler Hubs may have overlapping geographies by mutual agreement. Hubs should be able to describe their operating area in terms of counties, metropolitan areas or equivalent local government areas.



The Enabler Hub is involving main sector players in developing the Hub and delivering its services

- 48. We expect Enabler Hubs to comprise a consortium or partnership of key stakeholders in their geographic area, or to have the support of those key stakeholders. These might include existing enabler and support organisations for community led and affordable housing, voluntary organisations and Local Authorities. This can be evidenced in the list of organisations involved in the Hub in the application form, and with letters of support (or equivalent documentation) enclosed with the application.
- 49. We recognise that it may not be possible, or desirable, to fully and equally involve every relevant organisation in your geographic area. But we do expect you to have taken reasonable steps to have engaged them and considered their possible involvement. Where agreement has not been reached, we may ask for an explanation as to why a relevant organisation has not been included.
- 50. We would expect to see the involvement of different partners reflected in the Enabler Hub's governance arrangements, a memorandum of understanding, or similar.
- 51. If two applications are received covering significantly overlapping areas, Community Led Homes will first seek to resolve the problem. If no agreement can be found, we will either award funding to the stronger application or to neither, depending on the extent to which they meet the other criteria for funding.

The Enabler Hub will be using experienced advisers

- 52. Enabler Hubs should only use the services of advisers that have a reasonable level of skill and experience across a broad range of approaches. Your initial cohort of advisers should complete the skills checklist included with the application documents. Advisers needn't have strong skills and experience across every area, but Enabler Hubs without access to a spread of skills will not be awarded funding.
- 53. Community Led Homes has established a training and accreditation programme for advisers, and we will be running training courses through 2019 and 2020. This programme aims to improve and broaden the skills of existing advisers and provide a route into the sector for new advisers. Enabler Hubs will



be required to ensure that their advisers undertake training before March 2021.

The Enabler Hub is developing a strategy to become financially self-sustaining

- 54. Enabler Hubs applying for a Full Grant should have developed a business plan that shows how its core services will be provided when this and other grant funding ends. Enabler Hubs should show an understanding of what will be required to achieve a sustainable business model and show that they are taking steps at the outset to secure its future. Enabler Hubs can apply for a Development Grant to undertake stakeholder engagement, partnership development and research to develop a business plan.
- 55. Enabler Hubs that aim to charge Housing Associations and some community led housing groups a fee for completed projects in exchange for 1:1 support should have in place, or be agreeing, Memorandums of Understanding and/or contracts with projects in their pipeline. Enabler Hubs should aim to secure these agreements at an early stage, and not put off a means to secure future income until the end of the grant period.
- 56. Enabler hubs may be developing arrangements with Local Authorities to secure local sources of funding such as Right to Buy receipts, New Homes Bonus, Community Infrastructure Levy, Section 106 monies etc. to fund future core costs. As with fees, Enabler Hubs should seek to secure written agreement on these as early as possible.
- 57. The grant may also pay for activities that may not be sustained beyond the funding period, for example promotional and stakeholder engagement work. It is expected that these activities will comprise a minority of the work to be funded with the grant (that is, less than 50%). Applications that dedicate a large amount of time to these activities without a clear pathway to project initiation and delivery will not be viewed favourably.



6. Application process

58. Hubs are encouraged to contact Community Led Homes at an early stage to discuss their application. Community Led Homes has hub development support workers to help you develop your application and business plan. You should also thoroughly review this guidance document and the application form, and ensure you have your supporting documentation in place.

Application stage

- 59. There are separate application forms for Full Grants and Development Grants available from the hub development support workers. Please email hello@communityledhomes.org.uk or call 020 3096 7795 to request an application form.
- 60. Enabler Hubs applying for Full Grants should complete the application form and supporting documentation described on page 2 of the form including a business plan.
- 61. New and emerging Enabler Hubs should complete the Development Grant application form but are not required to submit a business plan. Applicants are not expected to have financial accounts for previous years if they are a newly emerging Enabler Hub, but a host organisation or the nominated fundholder must submit accounts, to demonstrate that they are in a sound financial position to hold the funding on the developing Enabler's behalf.
- 62. You are encouraged to complete the Project Pipeline Template and Skills Checklist for community led housing advisors to the best of your ability. Funding will then be awarded for the first six-month period, with subsequent funding released subject to the submission of quarterly monitoring reports.
- 63. You will be asked to email your application form and supporting documents to grants@communityledhomes.org.uk

Assessment and decision stage

64. Your application will be reviewed by an independent community business advisor, who will provide a covering report for the grants committee with their observations and recommendations. They may contact you with queries while



undertaking this work and may invite you to make revisions before resubmitting.

- 65. The grants committee will decide whether to support your application. It is independent of Community Led Homes and its four partner organisations. It meets monthly, and we will contact you as soon as possible after the committee meeting to let you know whether you have been successful. The committee may attach conditions such as changes to your budget.
- 66. If you are successful, our grant administrators, Groundwork UK, will undertake a due diligence process. If you pass the due diligence checks, Groundwork UK will send you a grant offer letter with the terms and conditions.
- 67. You must sign and return the offer letter within four weeks. Applicants must be able to start the activities within one month of signing their offer letter and must spend the funding before March 2021.



7. Assessment criteria

Development Grants

68. The assessors and grants committee will use the following criteria to assess applications. Applicants should reflect these in their application form and supporting documents.

Development Grant Application

Questions in development grant application form	Assessment criteria
What is the geographical area (counties/metropolitan/local gov areas) you	The Enabler Hub will operate in England
propose to cover?	The Enabler Hub will operate across a
	geographical area without significant overlap
	with another recognised Enabler Hub
	There is a rationale for their geography – links
	to potential demand for services.
What kinds of CLH support needs are there in	Evidence of understanding of local operating
your proposed area of operation?	environment for CLH
What is the charitable, benevolent or	The Enabler Hub must have a charitable,
philanthropic purpose of your proposed activities?	benevolent or philanthropic purpose
What are the barriers and opportunities?	Evidence of understanding of local operating
	environment for CLH
	There is a clear opportunity for the Hub to
	support CLH groups in the geographical area
The project pipeline and potential	There is an understanding of the potential
	pipeline and an understanding of how this could be developed.
	could be developed.
How you will provide advice on all forms of	Evidence of ability to develop and implement a
community led housing?	plan for a local enabling service where the
	core business is supporting delivery and providing advice on all forms of CLH
	providing device on an forms of CEIT



Income generating activities to become financially self-sustaining	Potential to recruit, support and manage staff and/or a pool of CLH advisors to support the range of skills and expertise required to deliver the functions of a CLH enabling service The Enabler Hub is developing a strategy to become financially self-sustaining Evidence of entrepreneurial spirit and aim for sustainability beyond a grant-to-grant existence Understanding of how they might develop future income through fees, consultancy, etc.
Risks	The applicant has identified appropriate risks and has clear strategies to mitigate the risks
Key people/organisations involved in the development of this proposal. (if applicable).	The applicant is involving main sector players in developing the Hub and delivering its services
How have, and will you engage stakeholders in your area?	The applicant has described activities to develop partnerships to create new opportunities for CLH and income (for example local authorities, housing associations, other CLH groups, developers etc.)
	There are no other applications to this programme for funding from other partners to deliver the same services in the area, and they have made reasonable efforts to involve the main sector players in their area
How will you develop the governance of your hub?	The Enabler Hub should be working towards becoming either an independent entity or hosted by another organisation, but with its own governance arrangements and ringfenced funding
What management, HR and contracting arrangements are in place, or planned?	There are plans to put strong management, HR and contracting arrangements in place
What do you hope to achieve with the grant? Project deliverables	The targets are realistic and measurable for the following outputs: • Number of advisors appointed to a pool



	 Number of hours of advisor time provided Number of community groups supported Number of local promotional events delivered, and number of attendees Number of local authorities engaged, at the level of senior officers and/or cabinet members, to support the delivery of the Community Housing Fund
Breakdown of budget	Evidence that funding is for eligible costs only All funding will be ring-fenced and restricted so it can only be used for the Hub Its core, fixed costs are reasonable and focused on developing a successful Enabler Hub and developing and trialling the provision of support services to local CLH groups and key stakeholders
State Aid	Reasonable consideration has been given to State aid question and evidenced. (See Appendix 2) Additional information of other funding received has been detailed
Other Funding	There is no indication of double funding The funding requested will provide additional services



Full Grant Applications

Your application form and business plan should describe the information included in the table below as they will be assessed against the criteria listed. You can structure your business plan how you would like but please ensure you have covered all the information.

Topic	Description of information requested in business plan and application form	Assessment criteria
Executive Summary	Please include a summary of your plan	Summary provided of business plan
Background/ Track record:	Your track record of supporting communities and delivering CLH advice (through the existing hub, consortium members, associates etc)	Evidence of delivering housing related programmes and advice
	Your track record in bringing in income from the Enabler Hub's services if you have one	Evidence of a strong track record in bringing in income from the Enabler Hub's services or, if fee income is a new approach, it is committed to that approach
	Who the key individuals in the Hub are including brief CVs of the Chair, Board and key staff members and associates	Evidence of ability to implement a plan for a local enabling service where the core business is delivery of CLH
Consultation and Collaboration:	Key people/organisations who have been involved in the development of this proposal	The Enabler Hub is involving main sector players in developing the Hub and delivering its services
		There are no other applications to this programme for funding from other partners to deliver the same services in the area, and they have made reasonable efforts to involve the main sector players in their area
		Evidence of having trust and respect of community, partners and local stakeholders
		Evidence of effective relationships with local influential stakeholders



	Stakeholders in the area that are involved in the Hub's operation and/or governance, or that support it;	The Enabler Hub is involving main sector players in developing the Hub and delivering its services Applicant has taken reasonable and positive steps to engage other organisations and individuals with relevant skills to consider how their services might be incorporated
	A description of partnerships developed, and further activities planned to develop partnerships to create new CLH opportunities	Applicant is developing partnerships to create new opportunities for community led housing, for example with CLH approaches not previously supported. Evidence of strong connections and /or plans to develop connections with local strategic stakeholders, in particular, Local Authorities, Housing Associations and organisations that might be able to support the service in the longer term.
The Business Model	Your geographical area of operation, the housing needs within it and the opportunities you see	The Enabler Hub will operate in England The Enabler Hub will operate across a geographical area without significant overlap with another recognised Enabler Hub Understanding of local operating environment for CLH
	The services the Hub intends to provide Your proposed programme of activities	The Enabler Hub will provide advice on all forms of community led housing Evidence of ability to implement a plan for a local enabling service where the core business is supporting delivery of CLH Evidence of access to and/or ability to offer directly certain services that will support communities to deliver CLH
	Your project pipeline:	Evidence of demand for enabler hub services



	Please use the Project Pipeline template provided to list the CLH projects that require support in your area and include any income you might receive from supporting them.	Clear opportunity for the Hub to support CLH groups in the geographical area A robust pipeline of projects including contracts in the pipeline to cover fee related support and expenditure Projects have been scored in the project pipeline document with realistic assumptions
	Hub's strategy for achieving sustainability: How the Hub will be financed and an explanation of how the income will be generated	The Enabler Hub is developing a strategy to become financially self-sustaining with realistic assumptions Evidence of entrepreneurial spirit and sustainability beyond a grant-to-grant existence
	SWOT analysis	Understanding of local operating environment for CLH Evidence of ability to implement a plan for a local enabling service where the core business is delivery of CLH
	A risk analysis including how the identified risks will be mitigated	Understanding of local operating environment for CLH Identified appropriate risks and has clear strategies to mitigate the risks A robust approach to mitigate against any risks from projected income targets to deal with any shortfalls in income. That might be either through having a large and strong enough pipeline of projects or through having secured or having plans to secure other sources of income.
Forecast Income and Expenditure	For the period covering the grant application plus 3 years afterwards which demonstrates long term sustainability of the Enabler Hub including income from the project pipeline and additional sources of	The Enabler Hub is developing a strategy to become financially self-sustaining with realistic assumptions



	income, for example from Local Authorities that received CHF grants	The pipeline corresponds to any fee forecasts and is appropriately cautious in terms of projected fee income, using the scoring pipeline instructions
Management and staffing	How the Hub service will be staffed/resourced and what plans are there to recruit new advisers to meet demand	The Enabler Hub will have a strong team and/or a pool of advisers with sufficient skills in social enterprise and in technical enabler work to support the range of skills and expertise required to deliver the functions of an enabling service
		Potential to recruit, support and manage staff or contractors to support the range of skills and expertise required to deliver the functions of a enabling service
	The management, HR and contracting arrangements.	There are strong management, HR and contracting arrangements in place
		Evidence that the hub will be able to mediate between CLH groups and providers of professional services and foster a collaborative co-ordinated approach between local advisors
Governance	Governance arrangements for the Hub, including detail of any hosting arrangement within a larger organisation	The Enabler Hub will be an independent entity with its own governance arrangements and ring-fenced funding
		There is a strong governance structure with a steering group or board that demonstrate a strong mix of relevant skills and commitment
	What is the charitable, benevolent	The Enabler Hub must be established
	or philanthropic purpose of your proposed activities?	for a charitable, benevolent or philanthropic purpose.
	How the effectiveness of the hub services will be monitored and improved over time, including capturing grant programme outputs	Evidence of ability to capture grant programme outputs and put in place measures to capture qualitative and quantitative outcomes



How the Hub's services will be marketed	Evidence of ability to promote interest in CLH and build demand and maintain momentum including local promotional events The promotion/marketing of its
	services is active and strong
How learning will be shared locally and nationally to develop the sector	Evidence of ability to inspire and accelerate action, taking communities along the journey from inception to delivery, management and stewardship of housing schemes, working in partnership when needed
	Willingness to receive capacity building support and training through the CHF Programme to ensure consistency and quality across all enabling services
Please complete the grant request breakdown and funding	Evidence that funding is for eligible costs only
breakdowns with further details	All funding will be ring-fenced and restricted so it can only be used for the Hub
	Its core, fixed costs are reasonable, value of money and focused on supporting the delivery of successful CLH projects
We expect hubs to contribute to all of the following grant programme targets: • Number of advisors appointed to a pool. • Number of hours of advisor time provided. • Number of community groups supported. • Number of local promotional events delivered, and number of attendees. • Number of local authorities engaged, at the level of	The targets are realistic and measurable
	How learning will be shared locally and nationally to develop the sector Please complete the grant request breakdown and funding breakdowns with further details We expect hubs to contribute to all of the following grant programme targets: Number of advisors appointed to a pool. Number of hours of advisor time provided. Number of local promotional events delivered, and number of attendees. Number of local authorities



	cabinet members, to support the delivery of the Community Housing Fund.	
State aid	Please complete the State aid questions and provide relevant information of other State aid funding received.	Reasonable consideration has been given to State aid question and evidenced. (See Appendix 2)
		Additional information of other funding received has been detailed.
Other funding	Please provide information about other funding secured or applied	There is no indication of double funding
	for and how the funding requested will provide additional services	The funding requested will provide additional services
		The hub should not be showing an over dependence on grants in its forward projected income.



8. Reporting Requirements

- 69. Enabler Hubs will be required to maintain data on the groups and projects in its area on the Community Led Homes online database.
- 70. In addition, Enabler Hubs will be required to complete quarterly monitoring returns with a statement of income and expenditure for the grant and indicating progress against the outputs in the grant agreement. These are:
 - Number of advisors appointed to a pool.
 - Number of hours of advisor time provided.
 - Number of community groups supported.
 - Number of local promotional events delivered, and number of attendees.
 - Number of local authorities engaged, at the level of senior officers and/or cabinet members, to support the delivery of the Community Housing Fund.
 - 71. Enabler hubs that receive funding will be required to engage as necessary with other programmes that are sharing learning between Enabler Hubs and participate in evaluation of this programme.



9. Support from Community Led Homes

- 72. We can provide three forms of support to Enabler Hubs in addition to these grants.
- 73. We can provide 1:1 support to your Enabler Hub, mainly by email/phone but also including visits. Emerging Hubs can use our support to facilitate partnership development, including co-producing and delivering workshops with potential participants, and helping lead organisations to develop their thinking. We can provide guidance on your business plan, and your governance and delivery arrangements. To request support please email: hello@communityledhomes.org.uk or call 020 3096 7795
- 74. Where we identify common needs that require outside expertise, we are able to commission or pay for this expert support for two or more Enabler Hubs. The better we understand your plans and work, the more likely it is that we will be able to help in this way. We will also link your team with the National Advice Centre, which, as the "nerve centre" for the sector, will be developing and commissioning technical resources to aid delivery and continuous learning.
- 75. We will be developing a programme of peer learning. This includes a Basecamp where you can communicate with other Enabler Hubs and share useful documents and resources. There will also be meetings organised around the country up to March 2020 to bring Enabler Hubs together for networking and learning.
- 76. Finally, Community Led Homes is running a training and accreditation programme for community led housing advisers. You can find more information and register your interest at www.communityledhomes.org.uk/advice



10. Grant Terms and Conditions

- 77. Full terms and conditions for the grants are set out in the grant agreement, supplied separately.
- 78. The grant agreement will set out the instalments of grant funding in writing and a list of agreed outputs.
- 79. Grants will be distributed in 6 monthly instalments. Future instalments of grant funding will depend upon the successful and satisfactory completion of monitoring information including the successful delivery of outputs and spend of the grant funding to date.
- 80. Any grant offered must be used exclusively for the purpose(s) specified in the grant offer letter.
- 81. Instalments of grants may be withheld, and the offer withdrawn, by the grants committee under the following circumstances:
 - a. Any conditions are not adhered to.
 - b. Insufficient progress is made against spend and the project outputs set out in the offer letter.
 - c. Groups supported by the Hub make little progress in developing their projects.
- 82. Where the grant offer is withdrawn and future instalments are withheld, the Enabler Hub may appeal to the grants committee whose committee's decision shall be final.
- 83. The Hub and this grant must be compliant with the European Union's State Aid Law. Further guidance is set out in Appendix 2.
- 84. Enabler Hubs must secure value for money in their purchase of goods and services and have appropriate procurement policies and procedures in place. For items under £10k one quote is sufficient, but for items over £10k a competitive tender process should be used and at least three quotes sought.



Consent to use your data

- 85. When you submit an application, you are consenting to sharing the data included in your application with the Community Led Homes partners Locality, and the grant administrators Groundwork UK. Please see Locality's privacy policy https://locality.org.uk/privacy-policy/
- 86. Information regarding the organisation and the grant received may be published by Community Led Homes and its constituent members. Such information may also be given to appropriate third parties unless otherwise previously requested by the organisation.
- 87. The Community Led Homes partners and Groundwork UK may contact you to obtain feedback on the support you have received from the programme.
- 88. By submitting your application your group will also be consenting to taking part in research and evaluation. We will take appropriate steps to ensure that the data you provide us with is protected from unauthorised access or disclosure.
- 89. In addition, you will have the option to provide us your consent to receiving mailings specific to community led housing news, information about funding opportunities, events and general updates that you might find useful.

Public Liability

- 90. Please consider carefully the activities you will be undertaking throughout your grant funded project, and whether any of the activities pose a risk to members of your organisation or the public. Remember risk can take many forms injury, financial loss, reputational damage, etc.
- 91. If you feel there is risk in any activities you will undertake, you will need to consider what insurance is required. An insurance broker or financial adviser will be able to give guidance on this. You may wish to include the cost of public liability insurance and professional indemnity insurance as part of your application.



Appendix 1 - charitable, benevolent and philanthropic purposes

The organisations selected to receive grants will be not-for-profit either due to their legal form or because of the way in which they are run, reinvesting all/most surplus into their charitable, benevolent or philanthropic purposes.

We expect all Enabler Hubs will deliver the following charitable purpose: 'the promotion of the voluntary sector for the public benefit by providing advice, information, training, assistance with funding and other services in support to voluntary bodies'. We do not require applicants to have this charitable purpose written into their governing document at the time of applying to the fund.

Enabler Hubs will also have as their primary activity the support of community led housing projects which themselves have charitable, benevolent and philanthropic purposes. The Enabler Hub Grant should only be used to support projects with purposes including the following:

- a) The provision and management of housing and provision of assistance to help house people and associated facilities amenities and services for the relief of financial hardship;
- b) The promotion for the public benefit of regeneration in areas of social and economic deprivation;
- The relief of poverty or financial hardship (other than the provision of housing);
- d) The relief of those in need by reason of youth, age, ill-health, disability or other disadvantage;
- e) The advancement of education, training or retraining, particularly amongst unemployed people, and providing unemployed people with work experience;
- f) The provision of workspace buildings and/or land on favourable terms, financial assistance, technical assistance, or business advice or consultancy in order to provide training and employment opportunities for unemployed people in cases of financial or other charitable need through help: (i) in setting up their own business; or (ii) to existing businesses;
- g) The promotion of the voluntary sector for the public benefit by providing advice, information, training, assistance with funding and other services in support to voluntary bodies;
- h) The promotion of social and economic inclusion by preventing people from becoming socially excluded, relieving other needs of those who are socially and/or economically excluded and assisting them to integrate into society; and



i) The promotion of sustainable development.

The most common case will be the relief of financial hardship through the provision of affordable housing (purpose a) which is also one of the primary purposes of the Community Housing Fund.

A secondary aim of the Community Housing Fund is to deliver a lasting legacy for the community led housing sector in the form of an effective and financially selfsustaining body of expertise within the house building industry in England. The aim of Enabler Hubs must not be to promote the interests of individuals or individual organisations engaged in trade, commerce and enterprise in this sector, or provide benefits and services to them, which would confer unacceptable private benefits to them or their businesses.

Any personal benefits people receive through the Enabler Hub must be no more than a necessary result or by-product of delivering public benefit. Private benefits need to be incidental in both nature and amount. Personal benefits could include financial payments to the owners of a property that an organisation uses. For more guidance see this government webpage.



Appendix 2- State aid law

For funding to be classified as State aid *all four* of the following criteria must be present:

- (1) an economic undertaking;
- (2) receives State resources;
- (3) that give it a selective advantage; and
- (4) which could distort competition and affect trade between Member States;

No State aid

If there is no State aid, the funding can be provided to the applicant without the need for them to meet any further State aid requirements (subject to restrictions that may be applied to the bidder's onward spend as discussed below).

Where an applicant raises a "no State aid" argument, it can only be on the basis that one of the four criteria is not present, and will be assessed as follows:

(1) An economic undertaking

An economic undertaking is a person or organisation engaged in economic activity. The key way that an organisation can show they are not an economic undertaking is by showing that they will only use the funding to carry out non-economic activity. Note that providing or developing housing, and ancillary services, are all likely to be considered economic activities, therefore we expect this criterion will be met.

(Examples of non-economic activity would be the provision of State education or health services)

(2) Receiving State resources

As Community Led Homes is funded through the Community Housing Fund, the funds will always be State resources. This criterion will always be met.

(3) <u>Selective advantage</u>

Providing a grant to an applicant involves an inherent selective advantage. This criterion will always be met.

(4) Distorting competition and affecting trade between Member States



Activities with only a local impact, or which could only ever have a marginal impact on cross-border trade, will not engage the State aid rules.

As there is an international property development industry, where bidders are applying for funding which will support the development of housing, this could have more than a purely local impact. This is likely to be the case even in relation to rural and small-scale housing developments. Consequently, this argument to show no State aid will only rarely be applicable where funds are being used to develop housing.

De minimis State aid

Under the de minimis regulation, any one undertaking (organisation or person) can receive up to €200,000² of State aid over any rolling three-year period.³ When bidding for funding on the basis that it is de minimis State aid, applicants are required to state how much State aid they have received in the past 3 years. This figure, added to the amount of funding being sought, must not exceed the de minimis threshold for this exemption to be relied upon.

Services in the General Economic Interest (SGEI)

There are three key exemptions relating to SGEI, that are likely to be particularly relevant in relation to the Enabler Hub funding programme.

Developing and providing social housing, affordable housing and shared ownership housing all constitute an SGEI. Developing and providing market rent or market sale housing however falls outside of the definition of SGEI. Therefore, for a bidder to rely on any SGEI exemption they cannot use the proposed funds to develop market rent or market sale housing.

De minimis SGEI

There is a higher de minimis limit that applies where the bidder is providing an SGEI of up to €500,000 over any rolling three-year period.⁴

When bidding for funding on the basis that it is de minimis State aid, applicants are required to state how much State aid they have received in the past 3 years. It is

² Up to date conversion rates from Euro to GBP can be accessed at the InforEuro website at http://ec.europa.eu/budget/graphs/inforeuro.html

³ Commission Regulation (EU) No 1407/2013 on the application of Articles 107 and 108 TFEU to de minimis aid

⁴ Commission Regulation (EU) No 360/2012 on the application of Articles 107 and 108 of TFEU to de minimis aid granted to undertakings providing services of general economic interest



very important that this figure, added to the amount of funding being sought, does not exceed the de minimis threshold if this exemption is being relied upon.

The General Block Exemption Regulation (GBER)

When an applicant seeks to rely on GBER to exempt State aid, there are a number of requirements that need to be complied with. The GBER exemptions are one of the more technical aspects of EU law to apply and administer. When in doubt specific legal support should be sought as failure to comply with any one GBER requirement can risk losing the protection of the exemption, creating a risk that aid must be repaid to Community Led Homes.

The bidder's onward spend

Where applicants are receiving funding under the Enabler Hub Grant Programme, they are required to confirm in their bid application that onward services, supplies and works will be procured through a competitive, transparent, non-discriminatory and unconditional tender process. Holding a competitive, transparent, non-discriminatory and unconditional tender process ensures that providers of onward services, supplies or works will have no selective advantage (which was the third requirement for State aid) so the State resources will not be State aid in the hands of those providers.

To meet this requirement procurement processes should be proportionate to the spend involved, i.e. where the value of the contract is very low (say less than £10,000) or where there is only one supplier capable of providing the goods and services you may follow a single tender procedure. Where this is the case you must keep a record of the reasons why that procedure was thought to be appropriate.

State aid examples

1) Enabling Hub Grants - Development Grant Scenario

The Rural Community Council has been working with a number of local organisations with an interest in supporting the delivery of community led housing. As there is no existing Enabler Hub operating in their area, they are proposing to set up a new independent entity which will be hosted by them on behalf of the wider



consortium. They will work within a defined geographic area of two Local Authority areas and have confirmed that this does not overlap with any other Enabler Hubs. They are seeking a Development Grant to fund:

- Legal fees to become incorporated.
- Consultancy fees to assist with the partnership development, research and business planning.
- Office costs.
- Marketing and website development.
- A part-time member of staff to deliver 1:1 support to community led housing groups in the area to help build a pipeline of projects.

Answer – This Enabling Hub is in the early stages of becoming established. However, the part-time member of staff's role will be to build a pipeline of projects, meaning the funds are likely to be used to support development of housing which risks a cross-border impact on trade. Consequently, the funds are likely to be State aid in the organisation's hands.

There are a couple of exemptions that may be available in this scenario. The first are those relating to SGEI (provided the funds are only used to support development of social, affordable and shared ownership housing). The SGEI de minimis exemption should be available if the funds being sought, taken together with other SGEI de minimis State aid that the organisation has received in the last 3 years, is less than €500,000.

Alternatively, if the SGEI de minimis threshold would be exceeded, or the organisation would prefer to "save" its de minimis allowance for other projects, the Commission Decision on SGEI could be relied upon to exempt this aid.

GBER may also offer other available exemptions, for example Article 16 for regional urban development aid, or Article 17 for investment aid to SMEs. To rely on Article 16 the activity must take place in an assisted area and the relevant aid intensity must not be exceeded (the permitted aid intensity will depend on the size of the organisation). Article 17 can be relied upon if the organisation is an SME and does not require that the activities take place in an assisted area, though note that the permitted aid intensity under Article 17 is very tight, at between 10-20% depending on the organisation's size.

2) Enabling Hub Grants - Full Grant Scenario

The New City Community Land Trust started several years ago with support from the NCLTN Umbrella Fund. With the increased interest in community led housing



and the significant number of schemes coming forward they have started to expand their advice and support to other forms of community led housing (co-housing, self-build, cooperatives, etc).

They are seeking a Full Grant to fund:

- An expanded pool of associate advisers providing 1:1 support to community led housing groups.
- Travel costs.
- Marketing and promotional materials, and a new website.
- A conference and events programme aimed at early stage groups.
- Other organisational running costs associated with the hub's expansion.

Answer – This organisation is well established and is expanding. In particular, their plans to set up a conference and events programme creates a risk of some crossborder trade. This risk is fairly small but means that a more cautious approach is warranted.

Consequently, a similar analysis should be applied as with the "Enabling Hub Grants – Development Grant Scenario" above.