



**Reopening High Streets Safely Fund**

**Frequently Asked Questions V5**

**Changes to FAQ document:**

- Questions marked with an Asterix are new.
- Eligibility around staffing added (page 12)
- Document reformatted into sections with added contents page.

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## ELIGIBILITY:

### **1. *\*Are footfall counters eligible?***

**Answer:** As per page 10 of the [RHSSF guidance](#), under additional reporting: *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. Before beginning to spend your grant, you should look to set baselines for future measurement in particular relating to the current footfall in your high streets. The costs of incurring these baselines, assuming they are not already available, can be covered as part of the costs associated with developing an action plan.* Therefore, the cost of footfall counters is eligible under the fund for monitoring, as long as they relate to the area in which RHSSF activity is to be rolled out.

### **2. *\*Can we spend funds outside our core town centre – say in neighbourhood / district centres, precincts etc?***

**Answer:** As per the RHSS Guidance, the temporary public realm CV-19 adaptations can be made in across High Streets or Neighbourhood Shopping Areas. These are not restricted to your core town centre; however, they should be within the boundaries of your Local Authority and meet the outputs definitions (pages 28-30 of the [RHSS Guidance](#)).

### **3. *\*Can we fund social media advertising to increase reach of key messages as we go into recovery?***

**Answer:** Yes, if this is directly connected to the activity strands of the RHSS Fund and to deliver reopening safely messaging. You will need to evidence the defrayal of expenditure.

### **4. *\*Can events and activities be held as long as we can evidence that this is to support RHSS?***

**Answer:** All activity undertaken must comply with current Government Guidance regarding social distancing and group-based activities. The activity will need to be directly linked to one of the 4 strands of activity. Activities of a celebratory nature or town relaunch for example are not eligible, this is not exhaustive.

### **5. *\*Are there some flexibility around physical interventions that might add value to the safety and appeal of our High Streets over a slightly longer period?***

**Answer:** The activity must as set out in the RHSS Fund Guidance be of a temporary nature. The activity must be completed by 31<sup>st</sup> March 2020.

### **6. *\*Are we able to fund market stall coverings, or new gazebos to enable more businesses to trade outdoors?***

**Answer:** This would not be eligible as it does not fall within any of the RHSSF strands. This would not be considered as a public realm change.

**7. *Are all of the interventions listed in the Safer Public Spaces [guidance](#) (section 4.2) eligible?***

**Answer:** The RHSS fund is not intended to fund all of the interventions listed in the Safer Public Spaces guidance. The four strands of eligible activity under this fund are:

- Support to develop an action plan for how the local authority may begin to safely reopen their local economies.
- Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely.
- Business-facing awareness raising activities to ensure that reopening of local economies can be managed successfully and safely.
- Temporary public realm changes to ensure that reopening of local economies can be managed successfully and safely.

Whilst the action plan may include some of the interventions included in the Safer Public Spaces guidance, RHSSF is not intended to fund the delivery of everything in the action plan. Eligible activity is limited to that set out above.

**8. *Are councils able to work in partnership with Local Highway and Transport Authorities when planning and implementing areas of work within scope of the RHSS grant.***

**Answer:** Yes, as per the RHSS fund guidance, councils in receipt of RHSS funds are encouraged to work in partnership with relevant organisations when developing and delivering activities in scope of the RHSS fund, this includes Local Highway and Transport Authorities.

**9. *Can RHSS funding be utilised to support the changes required to enable the reopening of public toilets?***

**Answer:** Changes to toilets are not eligible for funding under the RHSS fund.

**10. *Can we fund hand sanitiser stations on the High Street / Neighbourhood Shopping Areas?***

**Answer:** Yes, the provision of hand sanitiser stations on the street in supported areas would be an eligible cost.

**11. *Can we fund additional cleaning regimes / cleaners / cleaning consumables?***

**Answer:** No, Cleaning regimes, consumables and staff are not within scope of the RHSS fund and the costs would not be eligible.

**12. *Can we fund seating areas generally or specifically for disabled and elderly?***

**Answer:** The purchase or installation of seating is not eligible for funding under the RHSS fund.

**13. *Is a council able to claim from the RHSS fund grant, the costs of the revenue lost through maintaining paid carparking spaces as free spaces to encourage people back to the high street?***

**Answer:** Loss of carparking revenue cannot be claimed under the RHSS grant.

**14. Can we make changes to parking bays directly on high streets or identified neighbourhood areas?**

**Answer:** The RHSS fund can be used to make temporary changes resulting in the removal of pre-existing parking bays on identified high streets and neighbourhoods to allow for social distancing on pavements

**15. We would like to utilise parking bays or car parks to create parklets / seating and eating areas with the RHSS fund, is this eligible?**

**Answer:** Parklets / erection of seating within parking bays and car parks is not within scope of the RHSS fund and therefore not eligible.

**16. Can we fund new cycle lanes / paths?**

**Answer:** No, the funding of new cycle paths or lanes is not within the scope of the RHSS fund and cannot be claimed.

**17. Are temporary changes to cycle paths allowed?**

**Answer:** Temporary changes to pre-existing cycle paths / lanes which are located on identified high streets and neighbourhoods and directly linked to the changes to footpaths for social distancing are acceptable for RHSS funding.

**18. Does the fund support cycle storage?**

**Answer:** The provision of storage for cycles is not within scope of the four areas of the RHSS fund and therefore not eligible expenditure.

**19. We would like to employ street wardens / town ambassadors/ security to support the reopening of the high street in our town, is this in scope of the RHSS fund?**

**Answer:** The provision of street ambassadors, stewards or similar roles is not eligible for funding under RHSS. Local Authorities may fund Information Officers where they deliver business-facing awareness activity, as set out in strand 3 of eligible activity in the fund guidance.

**20. Can RHSS be used to support privately owned shopping centres or on privately owned land?**

**Answer:** The fund is aimed at supporting local businesses on high streets and neighbourhood centres. Local Authorities are encouraged to work in partnership with public sector landowners when implementing temporary public realm changes. Support for privately owned spaces is not within scope of the four types of eligible activity listed in the fund guidance.

**21. Can RHSS funding be used to provide grants to SMEs or to provide COVID19 adaptations to businesses on the High Street?**

**Answer:** This would not be eligible as providing grants or funding adaptations to businesses on the High Street is not within the scope of the RHSS fund.

**22. Can the fund be used to create/develop websites/ apps? \***



**Answer:** The production of websites would need to be directly in line with scope of the RHSS fund and solely focused on the provision of information relating to the safe engagement with High Streets and Neighbourhood Shopping Areas (NSA). Full ERDF branding requirements must be adhered to. A transport app would not be eligible.

The website must not feature destination or visitor information beyond COVID 19 safely reopening information relating to the specific High Streets and NSA.

Full [ERDF branding](#) and [procurement](#) requirements must be adhered to.

**23. We would like to procure a consultant to deliver activity as part of business facing activity, is this eligible?**

**Answer:** Yes, the procurement of consultants to deliver activity specifically in line with business facing activity as set out on page 6, number 3 of the guidance, is eligible. The procurement process must be ERDF compliant.

**24. We would like to purchase planters to act as barriers on designated High Streets and Neighbourhood Shopping Areas. Is this eligible for RHSS Funding?**

**Answer:** The purchase and use of planters to provide [temporary safety measures](#) to ensure public spaces next to businesses are as safe as possible is eligible for RHSS Funding.

Planters must be used in a temporary nature lasting no more than 12 months and must remain mobile, not fixed to the ground.

Local Authorities will be required to clearly demonstrate the need for and appropriate use of planters in a temporary approach, within the Grant Action Plan and local COVIDI-19 response plans as part of wider safety schemes.

Planters must not be located on privately owned land.

Where the resulting barrier is to be located between private business outdoor seating and wider public space and there is more than one business in the locality, the benefit must be to more than one business.

The cost of purchasing planters should be reasonable and demonstrate value for money and not result in assets or major assets as defined in the [ERDF Guidance](#).

**25. Management of Planters**

In line with the RHSS Fund Guidance page 7 Activities Out of Scope, Local Authority staff already employed to undertake the management of planting schemes and green spaces are not eligible for RHSS Funding.

Local Authorities can undertake procurement of a provider to maintain the planters for the period of use up to 31<sup>st</sup> March 2021. All procurements must follow full ERDF Procurement [rules and guidance](#).

## CONTRACT MANAGEMENT (INCLUDING GAP)

**26. *\*Are we able to fund something that we haven't included in our GAP? Are we able to amend our GAP?***

**Answer:** There will be an opportunity to review the GAP form in the near future as you are allocated a Contract Manager (CM). The CM will review the GAP form submitted and will be in touch to discuss its content. You will also be able to discuss the possibilities around changes to the GAP at this point. You are able to claim up to the total of your allocation. Once you have been issued with a contract, you will have the opportunity to submit a formal Project Change Request (PCR) for proposed new strands of activity to be considered, this relates to the 4 strands of activity set out in the RHSS Fund Guidance. This will be between the contract signing and 31<sup>st</sup> January 2021 to enable changes to be signed off and delivered. In the first instance, project changes must be discussed with your Contract Manager and they will establish whether a PCR is required.

**27. *\*When will 'at risk' expenditure be confirmed?***

**Answer:** This is a two-stage process, the at-risk position ceases when the Grant Funding Agreement is signed, and the expenditure is reviewed at the point of claims. LAs should note that the project will be subject to various checks by the Managing Authority and Audit Authorities who may take a differing view on the eligibility of expenditure. Eligible expenditure can be incurred from 1<sup>st</sup> June 2020 and all costs need to have been defrayed by 31<sup>st</sup> March 2021.

**28. *\*Will there be an opportunity to discuss eligibility/ compliance before the grant funding agreement is signed?***

**Answer:** Yes, a Contract Manager will contact you to finalise the details of the Grant Action Plan ahead of progressing to contracting. Where an item is found at a claim to be ineligible, the item will be required to be removed from the claim, with the costs incurred to be covered by the LA. The RHSS Fund allocation can then be utilised for a different item, if appropriate.

## EXPENDITURE:

### **29. *\*Can expenditure and activity go beyond 31 March 2021?***

**Answer:** All expenditure needs to be defrayed and delivery completed by 31<sup>st</sup> March 2021

### **30. *\*Are we able to claim for staff expenses through the fund, for staff not employed in a new RHSS funded role?***

**Answer:** No. Expenses can only be claimed for staff who are costed to the project (whether through timesheets or working 100% on the project). All expenses must be directly relevant to the delivery of eligible project activity and be proportionate.

### **31. *\*What is the minimum value of an 'Asset'?***

**Answer:** Individual items with a purchase value exceeding £1000 would be classed as Mobile Assets and would need to be recorded on the project asset register.

### **32. *Can Local Authorities enter into Delivery Partner arrangements with other tiers of local government?***

**Answer:** Local Authorities (LA) in receipt of RHSS funding are able to deliver activity in support of the fund through Delivery Partner arrangements with other tiers of authority, if they are identified as the most appropriate provider for the in-scope activity.

It is important to remember that if you would normally procure the activity then it must be procured.

To allow other tiers of authority to deliver activity and defray RHSS funding the follow is required:

- Where a LA in receipt of RHSS funding identifies a different tier of authority as a Delivery Partner, this must be reflected in any action plans, set out within the information RHSS will capture for the LA via a Grant Plan Form and in the Grant Funding Agreement. The Grant Plan Form will require the:
  - Names of those Delivery Partner LA tiers
  - The activity they will undertake
  - Brief details of why they are best placed to deliver it
- The LA will need a Service Level Agreement (SLA) with the Delivery Partner LA tiers
- The LA in receipt of the RHSS funding maintains responsibility for the full ERDF and RHSS compliance of any Delivery Partner.
- Full defrayal of costs will be required by the Delivery Partner LA tiers and payment will be in arrears by the LA in receipt of the RHSS funding.
- All expenditure must be at cost.



**33. Can we combine our allocation with another Local Authority?**

**Answer:** We are pleased to be able to confirm that two LAs may combine their RHSS allocations if they wish.

- One council would be designated the lead LA who would enter in the Grant Funding Agreement with CLGU, the other LA would enter into a delivery partner agreement with the lead LA.
- This would then be treated as one allocation, with the two LAs able to split funding across the combined geography as agreed between them.
- Both Local Authorities would need to be in the same ESIF Category of Region in order for this to be considered. Category of Region listings can be found [here](#).
- We would need written confirmation from both parties that both are content to enter into such an arrangement. This should evidence that it has been considered at the appropriate level within each council and confirm who will be the lead Local Authority.
- This is in addition to the existing option for LAs to enter into delivery partner agreements with other tiers of local authority who do not have an RHSS allocation, (for example parish councils).

If you wish to pursue this as an option, please contact the RHSS mailbox in the first instance.

[RHSSFund@communities.gov.uk](mailto:RHSSFund@communities.gov.uk)



## **BRANDING AND PUBLICITY:**

### **34. Branding**

Local Authorities are required to fully comply with the ERDF Branding and Publicity Guidelines for all activity including the temporary installation of planters. Please read the Branding FAQ for further information and follow the [ERDF Branding and Publicity Guidance](#)

### **35. \*Use of regional logos**

You are required to use the HMG and ERDF logos; as this is a national project. You may choose to use regional logos in addition if you wish.

If you have previously used a regional logo alongside the ERDF logo, we would not consider this ineligible. However, moving forward, as set out in the RHSSF guidance, the HMG logo should be used alongside the ERDF logo.

### **36. Are the branding and logos required to be printed on every piece of signage, pavement sticker or temporary public realm adaptation?**

**Answer:** Councils are required to ensure that all activity funded by the RHSS grant is compliant with the [ERDF Branding and Publicity Guidance](#) and the [Reopening Highstreets Safely Guidance](#) which states on page 10:

*‘Display of at least one poster of minimum A3 size, readily visible to the public (e.g. the entrance area of a public building) at the location of the activities being implemented and containing information on the work being delivered’*

Posters or display boards will need to be located prominently in at least one location for each Highstreet or neighbourhood area where RHSS funded activity is in place.

## PROCUREMENT:

**37. *\*If you have procured elements via the Business Improvement District as a delivery partner, how is the defrayal of expenditure process evidenced?***

**Answer:** This activity would not be eligible as BID's are not eligible to be delivery partners.

**38. *\*We have followed our council's procurement guidelines on expenditure at risk and this differs from ERDF guidelines. Does this matter?***

**Answer:** All procurement that you wish to claim through the RHSS Fund must have been undertaken following the [ERDF Procurement Guidance](#).

**39. *\*Existing Suppliers:***

You may use existing frameworks where those have been compliantly procured (e.g. correct procurement route, OJEU requirements have been met), in which case the framework documentation would not need the ERDF/HMG logos. However, call offs from that framework to be used for the RHSS project would need to be compliant with both ESIF procurement and branding requirements. Existing contracts, which have now expired, are not a basis for direct awards.

**40. *\*Single Tender Justification Form:***

Where there is only one possible supplier, you would need to retain evidence of such and complete the Single Tender Justification Form. We are unable to approve these but you will need to submit them to your Contract Manager. There are very few instances where a sole provider of a service or item can be adequately evidenced.

**41. *\*Use of the Procurement Policy Note:***

The ability to use the Procurement Policy Note depends upon the value of the item to be procured. The PPN refers items valued at £190K and above (OJEU) and can only be used for items above this threshold. It is deemed very unlikely that a council will be procuring items for the RHSS Fund above the £190k threshold. In addition, the EU Commission very unlikely to consider any procurement or activity undertaken for the RHSS Fund to constitute 'Extreme Urgency' and therefore the use of the PPN is not recommended for any procurement associated with the RHSS Fund.

**42. *\*VAT:***

As per page 29 of the [ESIF Procurement Requirements](#), threshold values are exclusive of VAT.

**43. *\*Obtaining quotes:***

It is considered very unlikely that 3 quotes would not be obtainable for the activities eligible within the RHSS Fund. Should the activity be of such a unique nature that not more than two companies can be found or provide quotes, this would need to be evidenced to demonstrate that 3 quotes have been attempted and the rationale as to why they could not be secured.



**44. *\*Deviating from the ERDF procurement process:***

We are unable to 'sign off' Local Authority deviations from the processes set out in the Procurement Requirements. LAs would need to complete Annex 2 or 3 of the Guidance as applicable and submit to their Contract Manager, however the RHSS team are unable to approve these. The decision and risk to carry out a direct award above the threshold sits entirely with the Local Authority.

**45. *\*Procurement at risk:***

Procurement can be undertaken during the at risk pre contracting period. The actual final details of each procurement will be captured at claims and reviewed for compliance with [ERDF Procurement Guidance](#).

## STAFFING:

### **46. \*Staffing Key Principles**

- RHSS funding should not be replacing the source for already committed expenditure.
- RHSS can't be used to pay for sunk costs.

If the Local Authority (LA) has a member of staff who could write the Action Plan or undertake the public facing communications activity for example, within their existing, normal hours, then the LA could not claim their hours as an RHSS eligible cost.

If the Local Authority (LA) has a works department or design team that could do the work in their existing hours, then that would not be an eligible cost. If those staff have no spare capacity, then overtime is eligible as long as the tasks are additional to the pre-existing tasks and the underlying activity is eligible in itself under the RHSS guidance. The LA would need to be able to evidence and justify the use of overtime in this scenario. Hourly rates would be required and would be based on the basic annual salary (see [ERDF Eligibility Guidance](#) for details). No overtime premiums would be claimable.

Where the LA does not have current staff employed to carry out the activity, you may employ new staff to do so as long as the underlying activity is eligible in itself under the RHSS Guidance. It must be directly aligned with one of the four strands of activity. For the avoidance of doubt, project administration or project management staff costs are only claimable within the 4% Management and Administration allowance (within your total RHSS allocation).

Where Local Authorities have staff within their employment who do not currently work full time or they are not currently employed to undertake the broad type of work within scope, their hours may be increased with an appropriate HR letter and following ERDF Eligibility Guidance to enable them to undertake the necessary activity. Staff time will be claimed using either hourly rate (timesheets) or fixed percentage methodology, set out within the ERDF Eligibility Guidance.

Staff could in principle be re-deployed to undertake an eligible activity as an alternative to employing additional staff or procuring contract staff, but if so, Value-for-Money would need to be evidenced. The re-deployed staff member's costs could only be claimed at the salary rate appropriate for that role, and not at the staff member's existing rate. It would also be necessary to show the costs of the re-deployed staff member were not a sunk cost for the LA. Thus, a staff member currently at 0.5 FTE who increases that to 0.75FTE to be re-deployed to undertake a RHSS activity during the extra 0.25 FTE, could claim the additional 0.25 FTE cost. However, a staff member not currently employed to undertake a RHSS activity and who is not increasing the hours they work at the LA, is likely to be a sunk cost to the LA – the LA has to pay that employee's costs anyway, so if they are re-deployed to RHSS work there is no marginal cost to the LA and so the cost could not be claimed.

## ANNEX 1: SCOPE OF THE FUND

Please refer to the table below for examples of specific activities which are both in and out of scope, based on the application of the fund.

**Table 1:**

In scope	Out of scope
Updates to public realm changes, if social distancing rules are updated.	Place marketing signage or activity
Signage aimed at increasing safety <ul style="list-style-type: none"> <li>• Pavement markings</li> <li>• Lamppost banners</li> <li>• Hoardings</li> </ul>	Cleaning <ul style="list-style-type: none"> <li>• Staff or contractor costs for cleaning</li> <li>• Consumables</li> <li>• Pressure washing</li> </ul>
Financial Partnering with other Tiers of Authority <ul style="list-style-type: none"> <li>• LA's in receipt of RHSS funds can where appropriately establish formal Delivery Partner arrangements with other Tiers of Local Authority.</li> </ul> See question 32.	Financial support to businesses on the High Street / NSA <ul style="list-style-type: none"> <li>• Grants to businesses</li> <li>• Provision of PPE / cleaning / shop adaptations</li> <li>• Financial support for a business to extend their licensing / permissions (e.g. for outdoor tables and chairs).</li> <li>• Business to business or Business to customer campaign collateral</li> </ul>
Traffic management on the High Street or NSAs <ul style="list-style-type: none"> <li>• Pedestrianisation of High Streets / NSAs</li> <li>• One-way traffic systems that are temporary and linked to the pedestrianisation</li> </ul> Note the exclusion criteria for outputs P18 and P19	<ul style="list-style-type: none"> <li>• Staff or agency costs for traffic management</li> </ul>
<ul style="list-style-type: none"> <li>• Widening footpaths</li> <li>• Temporary barriers</li> <li>• Markings outside shops to manage queuing</li> </ul>	<ul style="list-style-type: none"> <li>• Greening of streets</li> <li>• Artwork, planters, vinyls etc to increase attractiveness of area or disguise empty shops</li> <li>• Seating areas</li> <li>• Gazebos/ Market stalls for outside street trading*</li> </ul>
On-street parking, where the temporary change is to remove existing parking facilities to allow for social distancing (e.g. by widening pedestrian routes)	Car parks <ul style="list-style-type: none"> <li>• Changes to signage</li> <li>• Changes to layout</li> <li>• Both public and private car parks are out of scope</li> </ul>
Information Officers working with SMEs to provide advice on safe reopening <ul style="list-style-type: none"> <li>• Employed by the Local Authority</li> </ul>	Staff to manage or support the public on the High Street <ul style="list-style-type: none"> <li>• High Street ambassadors</li> </ul>



HM Government



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<ul style="list-style-type: none"> <li>External consultants which have been procured in an ERDF-compliant manner</li> </ul> <p>1-2-1 advice to SMEs is eligible as long as it is available to all businesses on that High Street / NSA</p>	<ul style="list-style-type: none"> <li>Hosts</li> <li>Stewards</li> <li>Security staff</li> <li>Public information officers</li> </ul>
<p>Adaptations to existing cycle lanes within the defined high street and NSA areas linked to change to footpaths (to enable social distancing)</p>	<ul style="list-style-type: none"> <li>New cycle lanes</li> <li>Provision of cycle racks / storage</li> </ul>
<p>Hand sanitiser stations on supported High Streets / Neighbourhood Shopping Areas (NSAs) including the sanitiser for these stations only.</p>	<p>Toilets</p> <ul style="list-style-type: none"> <li>Adaptations to public or private toilets</li> <li>New toilet facilities</li> <li>Staff costs to clean or manage toilets</li> </ul>
<p>Communications and public information activity to ensure that reopening of local economies can be managed successfully and safely</p> <ul style="list-style-type: none"> <li>Digital</li> <li>Media and press</li> <li>Print and publications</li> <li>Websites</li> <li>Apps</li> </ul>	
<p>Creation or development of a Local Authority action plan to reopen High Streets safely</p>	
<p>Planters to be used as temporary public safety measures (barriers) – see question 24/25.</p>	
<p>Footfall counters – see question 1*</p>	