

# The 2019/20 Provisional Local Government Finance Settlement

10 January 2019



1. The Local Government Association (LGA) is here to support, promote and improve local government. We will fight local government's corner and support councils through challenging times by making the case for greater devolution, helping councils tackle their challenges and assisting them to deliver better value for money services.
2. This response has been agreed by the Chairman, LGA Political Group Leaders and LGA Resources Board Lead Members.

## Key points

3. The extra funding in the 2018 Budget, including an additional £650 million for children and adults, and £420 million for roads funding showed that the Government is listening to the LGA's call for desperately needed investment to ease some of the pressure facing local services next year. Councils, however, will still face an overall funding gap of over £3 billion in 2019/20. It is therefore disappointing that the Government has not used the settlement to provide further desperately needed resources for councils next year. Many councils will be forced to take tough decisions about which services have to be scaled back, or stopped altogether, to plug funding gaps. It is vital that the Government provides new funding for all councils in the final settlement, and uses the 2019 Spending Review to deliver truly sustainable funding for local government.
4. The additional one-off funding for adults and children's services announced in the 2018 Budget is welcome. However, there is still a substantial funding gap facing children's and adult social care in 2019/20. As the Public Accounts Committee has [acknowledged](#), local authorities are under real strain. Key services that support vulnerable people, such as social care and housing, are now under enormous pressure.
5. We have repeatedly warned of the serious consequences of the funding pressures facing these services. An injection of new money from central government is the only way to protect the vital services which care for older and disabled people, protect children and support families. In response to our own green paper on social care and wellbeing, we are calling on the Government to make the case for national tax rises or a new insurance scheme so that current and future generations can be confident they will be supported to stay healthy and well and can access the care and support they need to help them maintain their independence and wellbeing.

# Submission

6. The continuation of the higher referendum limit for council tax increases will give some councils the option of raising extra money to offset some of the financial pressures they face next year. For shire districts with the lowest council tax levels the 3 per cent limit does not provide any more spending power, as they can already increase council tax by 3 per cent or more due to the £5 flexibility. For many other district councils, the positive impact is minimal for the same reason. We call on the Government to offer further flexibility to these councils.
7. No national tax is subject to referendum. The council tax referendum limit needs to be abolished so councils and their communities can decide how local services are paid for, democratically, through the ballot box. On its own, however, council tax flexibility is not a sustainable solution to the funding crisis. Increasing council tax raises different amounts of money in different parts of the country, unrelated to need.
8. We welcome the Government's decision not to increase the New Homes Bonus (NHB) threshold further next year, and the provision of up to £20 million to fund this. The LGA would [welcome](#) the opportunity to continue working with the Government on how we can support house building. In response to the case from councils, the Government has recently consulted on increasing the level of Right to Buy receipts councils can reinvest in replacements. We look forward to the Government's proposals on next steps and hope that it allows councils to retain 100% of their receipts.
9. Further Business Rates Retention pilots will enable aspects of the 75 per cent Business Rates Retention system to be tested prior to implementation for all in 2020/21. We will respond to consultations on further Business Rates Retention and the Fair Funding Review in due course and will continue to work with the Government on these reforms, including tackling the impact of business rates appeals on local authorities.
10. We acknowledge that the Government has provided extra resources to some councils in 2019/20 to cancel the 'negative RSG' adjustment to tariffs and top-ups. The Government has also made an extra £16 million available through the Rural Services Delivery Grant. Councils which receive the extra resources will welcome this. The Government should use the 2019/20 final Settlement, the Fair Funding Review and 2019 Spending Review to provide the appropriate level of funding to all councils.
11. It is right that the £180 million surplus on the levy account is returned to local government, as it was top-sliced from Revenue Support Grant.
12. The four year deal runs out in March 2020. In order for councils to budget successfully they need clarity on future funding as soon as possible. We recognise that transformation, can reduce costs in the longer term results but these savings take some time to deliver and there are costs in the shorter term. In addition, many service contracts are long term which limits the ability of councils to make immediate changes to the volume or nature of services or to reduce costs. We

therefore remain concerned that there is no clarity over funding levels, for both the national pot and local allocations, and any council tax referendum limits, after March 2020. Nor do councils know how they will be affected by the implementation of a new funding formula alongside further business rates retention. This hampers meaningful financial planning at a time when central government grant funding is the lowest it has been for decades and demand pressures are increasing. We call on the Government commit to a full assessment of the overall funding needs of local government in the 2019 Spending Review and guarantee to fully fund them.

13. We welcome the earlier Autumn Budget this year and the Government's aim of a settlement on 6<sup>th</sup> December. It was a shame that due to other circumstances there was a delay of a week. We call for the Government to continue to commit to earlier settlements, as promised in the response to the Hudson Review.

### **Overall pressures and the funding gap**

14. Local services are facing a funding gap of over £3 billion in 2019/20. The resources announced in the Autumn Budget and provisional settlement, although welcome, are nowhere near enough to meet this gap. This is due to factors such as:
  - Increases in demand for council services due to demographic change. As population grows and people live longer, this adds pressure on both targeted and universal services.
  - Local government and its commissioned services, particularly in social care, have a significant number of lower paid staff, leading to a more significant impact of the National Living Wage than other parts of the public sector, including the requirement to adjust pay scales to accommodate the change.
  - The last six years have seen a 44 per cent increase in the number of homeless households. Last year there were 4,751 rough sleepers living on our streets, more than double the number recorded in 2010.
  - Problems are particularly pressing in children's services and adult social care as outlined below.
15. Between 2010 and 2020, local authorities will have seen reductions of £15 billion to core Government funding. As the Public Accounts Committee has [stated](#); with this reduction in funding and with rising demand for services, local authorities are under real strain. Key services that support vulnerable people, such as social care and housing, are now under enormous pressure. We have repeatedly warned of the serious consequences of funding pressures, particularly those facing social care services, for both the people that rely on them and the financial sustainability of other services councils provide. When councils are forced to reduce spending on services, it can have potentially negative longer term consequences on other areas such as prevention. This will increase the burden for the future both for councils and other organisations such as the NHS and the Police. An injection of new money from central government is the only way to protect the vital

services which protect children support families and care for older and disabled people.

16. The changes and spending reductions introduced under welfare reform appear to be contributing to pressures on local government services. For example, there is a potential link between welfare reform and increases in rent arrears, housing insecurity and demand for temporary accommodation. Evidence shows that those most affected by the reforms are often among our most disadvantaged residents, including disabled people, care leavers and lone parents. This places additional pressure on adults and children's services, early intervention and public health. Funding provided to councils to both administer benefits and to intervene with additional local support where necessary is not sufficient to meet the current pressures.
17. We consider that the Government should meet the funding gap facing existing local services in 2019/20 through the final settlement.

### **Children's Services**

18. Whilst flexibility in the use of resources is welcome, the £410 million additional funding allocated to support adult's and children's social care can only be spent once and the combined funding gap for adult and children's social care in 2019/20 is around £2 billion, even after taking this new funding into account, meaning that very significant pressures remain.
19. Organisations from across the public and voluntary sector have joined our consistent warnings that the current situation is unsustainable, with ongoing cuts to national funding for preventative services leaving children and families entering the child protection system in record numbers. On average, councils started more than 500 child protection investigations every day last year – up from just 200 a decade ago – and the number of children in the care system increased at the fastest rate since 2010.
20. Children who are experiencing, or are at risk of, neglect or abuse deserve the very best support to make sure they are safe and well and councils are committed to ensuring every child has the best start in life. Increasing demand-led pressures, combined with the funding gap mentioned above, means councils are finding it increasingly difficult to continue to provide high quality support to children and families who need it. It is time for the Government to give councils the resources they need to provide the support that vulnerable children and families need, when they need it.

### **Schools and SEND funding**

21. We welcome the extra £350 million of funding over the next two years to support children and young people with special educational needs and disability (SEND) which was announced in the days following the provisional settlement. However, this is not enough to deal with the

scale of the funding gap facing these services. [Research](#) commissioned by the LGA estimates the funding gap to be up to £1.6 million by 2021.

22. Councils are telling us that pressures on the High Needs funding block is one of the most serious financial challenges that they are currently dealing with. Some of these pressures are exacerbated by the financial and performance incentives on schools to exclude pupils meaning that the cost of support fall on councils when the best solution for the child may be to remain in mainstream education with additional support. This pressure risks falling on the General Fund due to the rules governing the transfers between blocks of the Dedicated Schools Grant (DSG) and rules on carrying over DSG deficits. Councils need an urgent injection of more cash to effectively meet the needs of children with special educational needs and disabilities.

### **Adult Social Care**

23. We welcome the confirmation of the allocations of £240 million adult social care winter pressures funding in 2018/19 and 2019/20, as well as a £410 million social care grant in 2019/20 for adult and children's services.

24. This helpful extra short-term funding to tackle some of the immediate pressures facing these vital services will be welcomed by councils. However, short term measures are not enough and the funding does not address the full extent of all immediate pressures, let alone pave the way for a sustainable, long-term future for social care. Councils, charities, care providers and others continue to warn of the serious consequences of funding pressures on older and disabled people who use services, their carers and the provider market. Councils cannot simply turn services on and off as funding ebbs and flows.

25. Social care authorities will be able to increase their council tax by up to 2 per cent (over the existing basic referendum threshold of 3 per cent) in 2019/20 as long as adult social care precept increases do not exceed 6 per cent over the 3 year period between 2017/18 and 2019/20. The majority of councils exhausted this flexibility in the previous years. According to LGA calculations, only 40 social care authorities have the full 2% left, and 67 have no additional flexibility left.

26. While the adult social care council tax flexibility is welcome, it is unfair to shift the burden of tackling a national crisis onto councils and their residents. Our analysis shows that nearly 40p in every £1 of council tax paid in England will be spent on adult social care by the end of the decade. The adult social care council tax precept policy also has a different effect in different areas as authorities with a weaker tax base will not be able to raise as much income through this flexibility as those authorities with a stronger tax base. In addition, the ability to collect council tax is unrelated to need.

27. Putting in place the right services, that are high quality and delivered by a sustainable provider market and properly skilled workforce, requires forward planning. Adult social care services still face a £3.56 billion

funding gap by 2024/25, just to fund the National Living Wage and to maintain existing standards of care.

28. In response to our own green paper on social care and wellbeing, we are now calling on the Government to abandon this short-term incrementalism and make the case for national tax rises or a new insurance scheme so that current and future generations can be confident they will have the care and support they need to live the life they want to lead.

## **Council Tax**

29. We recognise that the Government has confirmed the basic referendum principle for 2019/20 at 3 per cent, with the exception of all shire district authorities, for which a higher limit of either 3 per cent or £5 (on a Band D bill) applies and that all Police and Crime Commissioners, and the GLA charge for the Metropolitan Police, will have a limit of £24 on a Band D bill.

30. However, this is not a sustainable solution as increasing council tax, or introducing a social care precept, raises different amounts of money in different parts of the country, unrelated to need. This also adds an extra financial burden on already struggling households.

31. The LGA has consistently opposed nationally set referendum limits. No national tax is subject to a referendum. The council tax referendum limit needs to be abolished so councils and their communities can decide how local services are paid for, with residents able to democratically hold their council to account through the ballot box.

32. Should the Government proceed with setting referendum limits, we would repeat our call, which we made in our response to the Technical Consultation on the 2019/20 Settlement for the following to be taken into account:

- The adult social care precept raises significantly different levels of resources in different council areas which do not necessarily match spending pressures. 67 social care authorities will not be able to increase their adult social care precept further due to already being at the 6 per cent limit.
- For shire districts with the lowest council tax levels the 3 per cent limit does not provide any more spending power, as they can already increase council tax by 3 per cent or more due to the £5 flexibility. For many other district councils, the positive impact is minimal for the same reason. We call on the Government to increase the £5 limit for district councils to £10.
- There is also a case to examine an additional 'prevention precept' to be raised in shire district areas so that the same amount, adjusting for differing taxbases, could be raised in a two tier area as in a unitary area. How this 'prevention precept' is used should be agreed locally.
- Fire authorities need to be funded to take account of the full range of risks and demands they face. If there is no increase in the grant for Fire and Rescue Authorities, we understand they have suggested

that there be an increase in the referendum cap for standalone Fire and Rescue Authorities so they can address the range of pressures they face, including rewarding fire employees to reflect the positive impact that the broader work of fire and rescue services in collaborating with health and other partners could have.

## **New Homes Bonus**

33. The provisional amount of £918 million for the New Homes Bonus (NHB) has been included in Core Spending Power in 2019/20. This is an increase of £18 million compared to the indicative figures included in Core Spending Power for 2019/20 published with the 2018/19 final settlement in February 2019. The bonus will be funded through up to £20 million in grant with the rest (£900 million) in top-sliced funding. The LGA has always been of the view that the NHB should be funded outside the settlement.
34. The NHB makes up a considerable part of funding for some councils particularly shire district authorities who will welcome the decision not to increase the threshold further. However, the baseline of 0.4 per cent reduces the incentive to grow in relatively low growth areas and authorities with New Homes Bonus income will also be concerned at the lack of certainty over the Bonus in 2020/21 and in future years.
35. The lack of certainty about NHB makes it difficult to plan effectively and that risks putting the brakes on housebuilding schemes and growth-boosting projects at a time when the housing shortage is one of the biggest challenges facing the nation and it could further exacerbate the financial challenges facing some councils, particularly those in high growth areas. Even with the New Homes Bonus the cost of delivering services to new homes is not met in full. The LGA would welcome the opportunity to continue working with the Government on how we can support housebuilding. In response to the case from councils, the Government has recently consulted on increasing the level of Right to Buy receipts councils can reinvest in replacements. We [look forward](#) to the Government's proposals on next steps and hope that it allows councils to retain 100% of their receipts.

## **Business Rates and Fair Funding**

36. We will be submitting responses to the Business Rates Retention and the Fair Funding Review consultations and will continue to work with the Government on these reforms, including tackling the impact of business rates appeals on local authorities.
37. Along with individual councils, the LGA will continue to engage extensively in discussions with the Government on the implementation of further Business Rates Retention and the Fair Funding Review. Local authorities must receive as much advance notice as possible of their provisional funding baselines, and how the business rates retention system, will work to enable proper financial planning. In our response to the Fair Funding consultation we will be making clear that any outcome

of the Fair Funding Review will not be sustainable unless it is introduced alongside sufficient additional resources to meet the funding gap facing local authorities and to ensure that no council should see its funding reduce as a result of a new distribution system.

38. We welcome the fact that certain aspects of further retention can be tested through pilots and that 15 new pilots have been announced. At the same time it is important that this does not affect other authorities now or when further Business Rates Retention is implemented.
39. There are still more than 90,000 business rates appeals outstanding from the 2010 list. We are working with the Government to find a better way to deal with business rates appeals under the Business Rates Retention system. Separately, we call on the Government to ensure that all outstanding appeals from the 2010 rating list are dealt with as soon as possible, as well as checks, challenges and appeals relating to the 2017 list, through providing resources to the Valuation Office Agency and other relevant organisations. This will be relevant in the run-up to the next revaluation, due in 2021.
40. It is positive that councils will continue to be fully compensated for the loss of income from the centrally determined reliefs, such as the retail relief announced in Budget 2018, continuing rural rate relief and small business rate relief. However, this reduces the buoyancy of the tax base by impacting upon the amount of business rates income and the growth in business rates. This is one of the issues we will want to discuss with the Government as we move to further Business Rates Retention.

## **Public Health**

41. The Government has confirmed the previously published indicative allocations of Public Health Grant for 2019/20 confirming a reduction in the grant of £85 million since 2018/19. Councils continue to face significant reductions to their public health funding up to 2020/21. The public health grant will have been cut by the Government by £531 million (nearly 10 per cent) from 2015/16 to 2019/20. These cuts must be reversed.
42. Reductions to the public health budget will have a significant impact on the essential prevention and health protection services provided by councils and go counter to the Secretary of State for Health's statement that prevention is a priority as well as the focus on public health, prevention and reducing health inequalities in the NHS 10 year plan. We therefore consider the cut to Public Health Grant to be a false economy; reducing prevention increases the eventual cost to NHS and local government. We are pleased to see the focus on prevention in the NHS long term plan but note that the plan states that NHS funded activity will work with, but cannot be a substitute for, services provided by local authorities. These service must be properly funded.
43. It is crucial that councils are given a free hand in how best to find the savings in public health budgets and we seek the Government's



reassurance on this point. Anything less will make the task of finding the reductions more difficult. Councils are best placed to decide how reduced resources should be used to meet our public health ambitions locally.

44. In the Fair Funding Review consultation documents published alongside the settlement, the Government has set out that the final decision on whether public health grant will be funded through business rates from April 2020 will now be made in 2019. We are disappointed to see continued uncertainty over the future of the public health grant. The Government has previously committed to this grant being rolled into Business Rates Retention (and, as such, forming part of the Fair Funding Review) multiple times.

### **Negative RSG and Rural Services Delivery Grant**

45. We acknowledge that the Government has provided extra resources to some councils in 2019/20 to cancel the 'negative RSG' adjustment to tariffs and top-ups. The Government has also made an extra £16 million available through the Rural Services Delivery Grant. Councils which receive the extra resources will welcome this. As stated above, the Government should use the 2019/20 final Settlement, the Fair Funding Review and 2019 Spending Review to provide the appropriate level of funding to all councils.

### **Clarity on funding and predictability**

46. The four year deal runs out in March 2020. We remain concerned that there is no clarity over funding levels, for both the national pot and local allocations, and any council tax referendum limits, after that date. Nor do councils know how they will be affected by the implementation of a new funding formula alongside further business rates retention. This hampers meaningful financial planning at a time when central government grant funding is the lowest it has been for decades and demand pressures are increasing.
47. We welcome the earlier budget this year and the statement that the Provisional Settlement would be published on 6 December, made in response to the Hudson Review. It was a pity that in the event it was not possible for this to be done.

### **Funding for Fire and Rescue Services**

48. As with councils, Fire and Rescue Authorities will be able to raise their precept by 3 per cent in 2019/20. Without changes to the funding of fire and rescue services in 2019/20, there will continue to be pressure put on them and, and their ability to respond to the full range of risks they face and are expected to address. The reductions fire and rescue services will have to continue to find will have an impact on national and local resilience as well as operational capacity, and their ability to respond to unpredictable events.

49. Fire and rescue services need to be funded to take account of the full range of risks and demands they face, such as the new role they will have in ensuring building safety after the fire in Grenfell Tower and new fire risks they face such as the wild fires that occurred over the summer. To assist fire and rescue services to address the financial challenges they face, the referendum limit on their precept should be removed. Additional funding should be made available to enable fire and rescue services to drive transformation in the way they deliver their services and the capital funding issues faced by some services addressed.
50. It is disappointing that the Government has not recognised the issue of rewarding fire employees to reflect the positive impact that the broader work of fire and rescue services in collaborating with health and other partners could have. Work on developing the funding case continues and we look forward to continued discussions with government to deliver the best outcomes for fire and rescue services, their communities, partners and employees.

### **Brexit preparations**

51. Since the settlement, there has been a Treasury announcement allocating funding to departments for 2019/20 for preparations for Brexit. This includes £35m for MHCLG. While it is positive that the Government has allocated new resources to local government for Brexit preparations, £35 million is only available in 2019/20 after we leave the EU and simply nowhere near enough to deal with the work that needs to be done in our communities.
52. The UK's exit from the EU will have a significant impact on local government, creating challenges that need to be addressed but also opportunities to do things differently. Councils up and down the country are taking a lead on preparations for Brexit, including no deal, because our residents and our local businesses expect us to be ready. Any additional responsibilities or added financial pressures for councils arising from Brexit must be fully funded. Brexit will ultimately be judged as a success or failure by localities: real people in real communities. If the Government want to get this right, they need to properly resource local government to deal with the opportunities and challenges that Brexit presents.

## Annex

The responses to the MHCLG questions in the consultation are:

### **Question 1: Do you agree with the methodology for allocating Revenue Support Grant in 2019/20?**

We note that the methodology for allocating Revenue Support Grant (RSG) in 2019/20 is unchanged from 2016/17 other than to cancel negative RSG. The LGA does not take a formal view on distribution pointing to arguments on both sides.

We recognise that the Government has decided not to proceed with the negative adjustment to top-ups and tariffs known as 'negative RSG' in 2019/20, paid for from central government resources. The affected authorities will welcome the Government proposal to cancel the adjustment in the 2019/20 settlement.

However, all councils face significant funding pressures in 19/20 and beyond and huge financial uncertainty over the next few years and into the next decade. We call on the Government commit to a full assessment of the overall funding needs of local government in the 2019 Spending Review and guarantee to fully fund them.

### **Question 2: Do you agree with the Government's proposed approach to allocating £410 million un-ringfenced funding for adult and children's social care according to the existing Adult Social Care Relative Needs Formula?**

Relative Needs Formulae (RNF) are a recognised way of allocating grant resources, although we do not take a position supporting one or another distribution formula. For example, some authorities with high pressures relating to children's services might have preferred the grant to be allocated at least partly according to the Children's RNF.

### **Question 3: Do you agree with the Government's proposal to fund the New Homes Bonus in 2019/20 with the planned £900 million from Revenue Support Grant, with any additional funding being secured from departmental budgets?**

The LGA has always considered that New Homes Bonus should be funded from outside of the settlement.

We welcome the fact that the Government has listened to our calls to not increase the threshold even further and has found extra resources to fund this. We also welcome the Government not pressing ahead with further changes to bonus awards which it consulted on in earlier years.

### **Question 4: Do you agree with the Government's proposed approach of paying £81 million in 2019/20 to the upper quartile of local authorities based on the supersparsity indicator?**

We note that this is an unchanged methodology from last year and that the consultation states that it is funded by a top-slice from RSG. Authorities

which are in receipt of this funding will welcome it and the fact that the Government has increased the grant by £15 million to match the final allocation for 2018/19, however the funding should come from the Government and not at the expense of other councils.

**Question 5: The Government intends to distribute £180m of the levy account surplus. Do you agree with the proposal to make this distribution on the basis of each authority's 2013/14 Settlement Funding Assessment?**

We welcome the fact that the Government has decided to pay back £180 million from the levy account. The LGA has consistently argued that, whilst we agree with the principle of the safety net, we consider that it should be funded from outside the system. Therefore we have not supported the successive top-slices from RSG.

We note the government proposals to pay the top-slice according to the 2013/14 Settlement Funding Assessment. We recognise the technical merits of using the same methodology that was used to remove the top-slice originally.

The main reason for the safety net is to mitigate the impact of business rates appeals; the LGA looks forward to progress on reducing the number of speculative appeals through the new Check Challenge Appeal system and calls for the Valuation Office Agency and others to be given resources in order for all outstanding appeals from the 2010 list to be resolved as soon as possible.

**Question 6: What are your views on the council tax referendum principles proposed by the Government for 2019/20?**

No national tax is subject to a referendum. The council tax referendum limit needs to be abolished so councils and their communities can decide how under-pressure local services are paid for, with residents able to democratically hold their council to account through the ballot box.

However, increasing council tax is not a sustainable solution to meeting the funding gap facing local government as increasing council tax raises different amounts of money in different parts of the country, unrelated to need. This also adds an extra financial burden on already struggling households.

As stated above, should the Government proceed with setting referendum limits, we would repeat our call, which we made in our response to the Technical Consultation on the 2019/20 Settlement for the following to be taken into account:

- The adult social care precept raises significantly different levels of resources in different council areas which do not necessarily match spending pressures. 67 social care authorities will not be able to increase their adult social care precept further due to already being at the 6 per cent limit.
- For shire districts with the lowest council tax levels the 3 per cent limit does not provide any more spending power, as they can already increase council tax by 3 per cent or more due to the £5

flexibility. For many other district councils, the positive impact is minimal for the same reason. We call on the Government to increase the £5 limit for district councils to £10.

- There is also a case to examine an additional 'prevention precept' to be raised in shire district areas so that the same amount, adjusting for differing taxbases, could be raised in a two tier area as in a unitary area. How this 'prevention precept' is used should be agreed locally.
- Fire authorities need to be funded to take account of the full range of risks and demands they face. If there is no increase in the grant for Fire and Rescue Authorities, we understand they have suggested that there be an increase in the referendum cap for standalone Fire and Rescue Authorities so they can address the range of pressures they face, including rewarding fire employees to reflect the positive impact that the broader work of fire and rescue services in collaborating with health and other partners could have.

**Question 7: What are your views on the Government's approach to tariffs and top-ups in 2019/20?**

It is technically correct to adjust each authority's tariff or top up following a revaluation to ensure, as far as is practicable, that their retained income is the same after revaluation as immediately before.

**Question 8: Do you have any comments on the impact of the 2019/20 local government finance settlement on those who share a protected characteristic, and on the draft equality statement published alongside this consultation document? Please provide supporting evidence.**

The Government's Equality Assessment for 2019/20 notes that councils provide a wide range of services, targeting or impacting on persons who share a protected characteristic, only some of which are required by statute. As such, reductions in the amount of Revenue Support Grant available to local authorities have the potential to reduce the availability of these services, and therefore to impact persons sharing protected characteristics.

The LGA refers the Government to the response from individual member authorities.