



Training Handbook

How to think critically about fairness when
developing and assessing policy and practice

2015

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Overall purpose and structure of the handbook

A key role of Newport's Fairness Commission is to help provide what we have called a 'critical lens' through which Newport City Council, and others, can view their policies and practices. This 'critical lens' will, hopefully, enable a more thorough and critical examination of fairness as a social value, when developing and assessing these policies and practices, and, in the process, help politicians and others understand better the value of fairness and its different, and often competing, conceptions. 'Fairness' is a feel-good word, and one which it is hard for anyone not to approve of. But what it actually *means* is another matter. If we scratch the surface, we find that the term is so contested and debated that knowing what counts as a 'fair' outcome in any one situation becomes rather more complex than it might first appear. This Training Handbook has been written with the purpose of encouraging mature and meaningful public debate on the essential but also difficult business of promoting fairness. With this purpose in mind, the handbook is divided into three sections.

The first section starts with an outline of how and why the Fairness Commission was set-up, with a summary of the work the NFC has completed so far and a brief exploration of some of the problems in promoting 'fairness' as a social value. This section finishes with a two-part exercise to complete individually and in groups concerning what fairness means for *you*.

The second section explores in more detail debates and discussions around fairness outlining what the NFC has identified as the four 'parameters of fairness', or the *general* areas of debate and concern relating to fairness. From these we have identified key 'focal points' of fairness issues, or the more *specific* questions of fairness relating to particular groups and community-based issues. This section also finishes with a two-part exercise, where, in groups, we ask you to discuss particular policy and practice developments you may have been involved with, and identify specifically how the parameters and focal points for debate and discussion come into play as a result.

The third section ties the first two sections together by critically reflecting on a 'real life' case study, according to the above criterion and debates on fairness. The case study concerns a decision Newport City Council had to make in September 2014 to either disband or continue the Council Tax Help for Pensioners Scheme. Following an outline of the scheme, how it operates, the costs, and so on, the third two-part exercise ask you in groups to discuss the kinds of questions and issues which would arise around fairness, and as a result of either continuing or dismantling the scheme. Finally, in the Appendix we reproduce the report submitted to council in July 2014 from the Fairness Commission, concerning the above decision.

1. The Fairness Commission and problems in promoting ‘fairness’ as a social value

1.1 Newport’s Fairness Commission (NFC): its work and role

On the 25th September 2012 Newport City Council voted to establish an independent *Fairness Commission*, to monitor key Council decisions according to the criterion of fairness. Consistent with its manifesto pledge, the Commission was set-up by the Labour leadership as part of a “New Charter for Newport”. Newport’s Fairness Commission, being the first in Wales, followed similar Commissions which were already established in England – in Islington, Liverpool, Newcastle-upon-Tyne, Sheffield, and York (many other Fairness Commissions have been established in England since).

This was of course a time of extensive cuts in public expenditure. As well as addressing the impact of these initiatives, and the monitoring of budget spending and trends, these Commissions have also raised wider political debates about the *meaning* of fairness and how local government policies and practices are able to promote this as a coherent social value.

Since September 2012, Newport Fairness Commission has made various reports to Council, including a detailed full report submitted to Council in November 2013,¹ the setting-up of a website as a platform to present the NFC’s work,² plus a Twitter account,³ to encourage public awareness and debates on issues of fairness and the activities the NFC have been involved in.

The full report to Council outlines the composition, remit and membership of the NFC; the NFC’s understanding of fairness and the various questions and issues raised (to be explored below); the details of a public survey carried out on the NFC’s behalf relating to issues of fairness; the NFC’s response to short- to medium-term Council budget allocations; and, a case study of a decision made by Council to reverse a planned closure of a library in the Newport area.

Following the above, The Fairness Commission’s overall role is to help provide what we have called a ‘critical lens’ through which Council (and others) can view its policies and practices – that is, enabling a thorough examination of fairness as a value, most notably when policies and practices are being formulated, evaluated and assessed. However, in

¹ Newport Fairness Commission (2013) *Taking Fairness Seriously* – this report can also be found on our website – see link in note 2 below

² <http://www.newportfairnesscommission.org/>

³ <http://twitter.com/FairNewport>

order to carry out this examination effectively, the NFC believes it is essential first to recognise the problems in promoting ‘fairness’ as a social value.

1.2 Problems with promoting ‘fairness’ as a social value

First, the very notion of fairness is a ‘hurrah’ word which everyone, from whatever political quarter and from all moral points of view, cheers about and champions. Consequently, using the word ‘fairness’ risks turning debate into empty platitudes; as no-one claims they are *against* a fair society, as this is akin to arguing against a value everyone *already* agrees is worth pursuing.

Second, there are wider and deeper problems of promoting fairness in any political, social, and economic context, but most especially in times when resources are being very severely restricted. In addition, other pressures on budgets have led, and *will* lead, to increases in demand on the ‘public purse’ (relating, for example, to changes in demography across Newport and elsewhere). Consequently, it seems inevitable that increasing demands, as well as restrictions in budget allocations, will lead to large shortfalls in Council spending, which, in turn, complicates further how any notion of ‘fairness’ is both understood and implemented, and the questions which arise as a result. For example, what should we do when the fairest outcome is too expensive to achieve, or when we must choose between two priorities *both* of which are clearly promoting fairness?

The central job, then, of this training handbook is to move *beyond* political platitudes and start exploring the more difficult questions and issues concerning fairness – so openly identifying the challenges of implementing fair policies and budgets while living in a period of government austerity.

1.3 Exercise 1 – what does fairness mean for you?

Part A – Now watch the following YouTube clip and in groups discuss how the above problems in promoting fairness as a social value might be reflected in what is being said in the clip. Have there been any examples in your life of when you have been treated unfairly? If so, in what ways exactly?

https://www.youtube.com/watch?feature=player_detailpage&v=g9ZOZ7YTzfl

Part B – So, with the above issues in mind, please complete the following exercise individually, and then compare your answers with others in your group:

When thinking about how local Government uses its resources and spends its money, complete the following. The Council is being fair when.....⁴

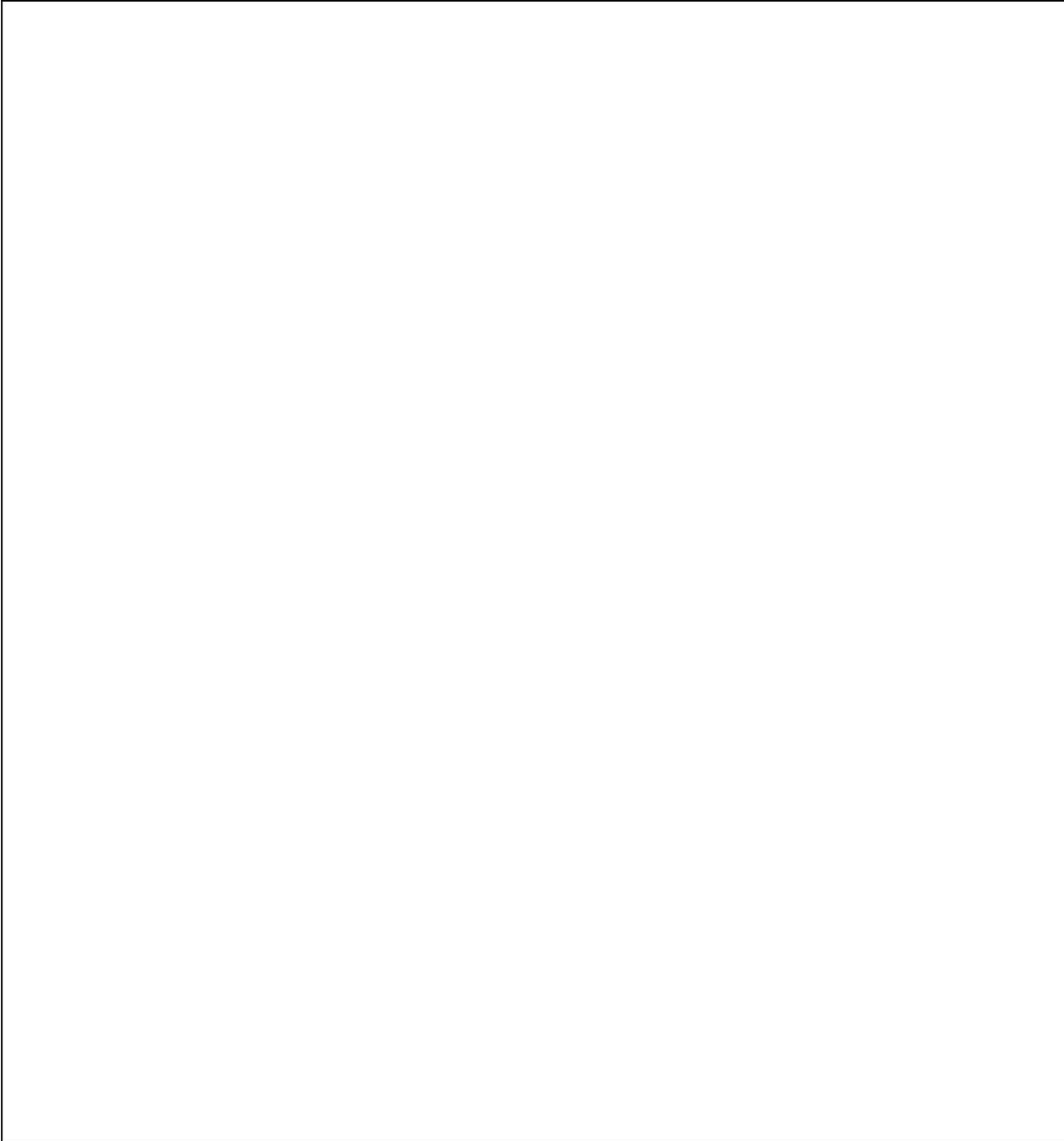
Comments and thoughts box

What were the similarities and differences between your answers?⁵ Can you anticipate any problems in applying *your* definition of fairness to particular policies and practices of local government and/or other institutions and organisations you may be involved in?

Comments and thoughts box

⁴ This is the first survey question the NFC asked in its public survey on fairness, the findings of which were included in the full report to Council, detailed above.

⁵ It is important to note that the NFC's full report to council identified what it saw as a fundamental principle underpinning all parameters of fairness to be explored below – namely, that council should attend to the needs of those groups considered vulnerable or disadvantaged, as a matter of first and immediate priority. Of course, this leaves open many debates and questions about *who* is vulnerable or disadvantaged and *how* these groups should be prioritised which are questions and debates reflected in the four parameters below. Nevertheless, it is interesting to ask whether you and other participants in the group also identified this principle as being fundamental to all understandings of fairness, despite other differences.



2. Debates and discussions about fairness

2.1 Four *parameters of fairness* and the key *focal points* of debates and discussions

Given the challenges of pinning down what fairness specifically means, Newport Fairness Commission has identified four broad *parameters* of fairness, defined here as the general areas of debate and concern relating to the overall character of fairness. On this basis we have identified key *focal points* of fairness issues, defined here as more specific questions of fairness relating to particular groups and community-based matters.⁶

2.2 *Parameter 1 – Equal treatment while recognising difference*

The principle of equal treatment for like cases (so basically, the idea that we should be consistent in our treatment of individuals in similar situations) is often, quite rightly, regarded as a fundamental principle of fairness. However, this immediately raises issues concerning what *counts* as a like or *unlike* case, as this principle must also acknowledge the importance of treating people at times differently *and so* fairly. After all, treating people in *different* situations as if they were in the *same* situation seems just as likely to lead to unfairness. However, these differences immediately lead to disagreements and controversies which, in turn, reflect broad areas of debates and discussions concerning *when* it is fair to treat people the same, and *when* it is fair to treat people differently? What groups have priority in relation to resource allocation, and why? And, if trade-offs are to be made between different group interests (in other words, if one group is allocated resources *at the expense* of the other), how should these trade-offs be balanced, and why?

For example, a popular interpretation of fairness is likely to be ‘equity’ (reflecting the principle of ‘equal treatment for all’ as the general aim of fairness) but there is a danger that this will unfairly discriminate for or against one group or another given the differences in, say, need or advantage between groups and areas. So, simplistically, the most equitable way of imposing cuts would be to divide the total amount needing to be saved by Council and withdraw services of that value from every citizen equally. However, clearly that would result in considerable hardship to substantial numbers of already disadvantaged and/or vulnerable groups or areas. This then leads to the question, *when* is it fair to treat the latter groups differently to other groups and *when* is it fair to treat them the same?

⁶ Also see the NFC’s full report to Council in November 2013 and detailed in section 1 above.

2.3 Parameter 2 – Mutual obligations between citizens and government

The relationship between citizens and government is also complex and conflicting. Legitimate expectations on government to provide for citizens' needs may conflict with expectations on individual citizens to be responsible and law-abiding, and may include relatively well-off citizens meeting their *own* needs. However, some services may be provided to everyone regardless of whether these needs can be met by individual relatively well-off citizens. The broad areas of debate and discussion are precisely how and when these expectations and obligations are defined and met between citizens and government? Which needs are met unconditionally and which are not, and why? And, which needs are to be provided universally (i.e. to all citizens) and which are needs are to be met, in part or wholly, by citizens, and why?

For example, if rubbish collection or police services were procured on the grounds of financial advantage and not provided universally, most people would consider this not only as unfair, but also that it would lead to other very undesirable social consequences. Consequently, while there might be a legitimate targeting of selective resources on some sections of the community over others, there may also be obligations on local government to provide a range of services universally, even in times of austerity – the overall question for the NFC in relation to this parameter, is when this distinction between 'universal' and 'selective' provision is appropriately made and why, reflecting those respective obligations of and on government and citizens?

2.4 Parameter 3 - Interdependency and reciprocity within community relations

The interdependency of social relations is apparent when examining the social and economic conditions of fairness. Individuals do not live in isolation, especially in modern industrial societies. Consequently, we are variously dependent on each other for meeting our needs, wants, and aspirations, so mutually promoting our well-being and prosperity over time, through engaging in reciprocal social relations.

For example, in relation to our education, employment, social services, health, culture and leisure, economic regeneration, community safety, the sustainability of the environment, and the durability of policy and practices over relatively long periods, it is important to acknowledge how our social relations in these policy areas are both interdependent and reciprocal. We depend on others to meet our needs and aspirations in these respects; *but* we also expect to have the opportunity to make a contribution and participate in the life of the community as a result of these needs and aspirations being met. The broader areas of discussion and debate, in relation to these policies, are precisely how and when opportunities and 'life chances' are facilitated and to whom, so

enabling citizens, from whatever social or economic background, to participate effectively in the life of the community? How to enable citizens to positively participate in the life of the community over periods of time, for their own and others' benefit? And, in what ways do these policies and practices variously facilitate and/or hinder this process? Moreover, the issue of the sustainability and durability of these policies, is perhaps particularly important when considering the impact on disadvantaged communities, and when exposing the extent to which citizens are able (as well as willing) to reciprocate through the opportunities and 'life-chances' made available to them over long periods.

2.5 Parameter 4 - Transparency and accountability in decision-making

Finally, local government should also ensure that procedures of decision-making are transparent, and accountable, also enabling the effective democratic participation of citizens. In other words, conditions of fairness, not only relate to certain *outcomes* of the kinds outlined in parameters 1-3 above leading to a particular allocation of services and resources, but also concern the *just procedure* for allocating these resources. So, it is not enough that good decisions are made. The general public, and particularly those directly affected by those decisions, need to be able to *see* how and why those decisions have made, and ideally to have been consulted on them. The broad areas of debate and discussion are: Precisely how and when are decision-making procedures to be considered transparent and accountable? How to convey clearly and concisely to citizens, and other interested parties, the main decisions being considered and made? How are meaningful channels of communication and exchange of views and opinions between policy-makers, practitioners, and those affected, opened-up and facilitated?

For example, it is important for the NCC to present budgetary considerations and decisions in an accessible and easily understandable manner. However, the NFC also recognises that when the Council consults public opinion, there is a difficult balance to be made between transparency (which may involve making available considerable detailed information) and ease of access to information (which may involve giving abridged information for simplicity sake). It is also important to acknowledge that NCC does not operate in political isolation, and is part of a wider national democratic decision-making process. For example, some of the NCC's decisions may be *legitimately* constrained by recommendations from the Welsh Government – for example, concerning the maintenance of education budgets – but which, in turn, puts pressures on other budget areas and populations. The issue of fairness in this context are again complex and multi-layered, as it concerns the conflict or trade-off between national decision-making and local decision-making, either of which might be thought to be based on fair procedures, but leading to possibly unfair outcomes for the local community or communities concerned.

2.6 Exercise 2 – The four parameters and the development of policy and practice

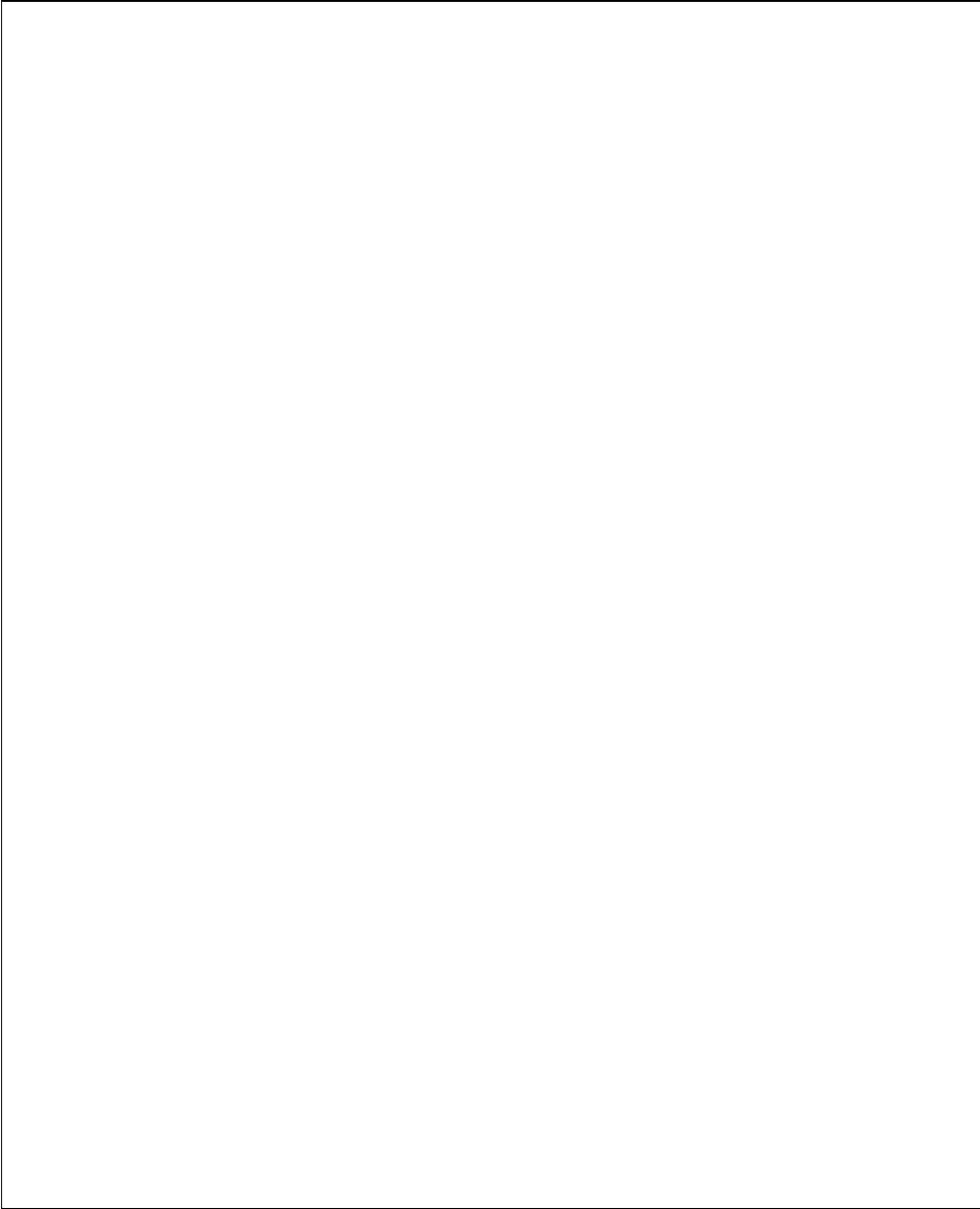
Part A - Now look at the following YouTube clip and in groups discuss how the monkey experiments relate to the above four parameters of fairness, and the debates and issues which follow

https://www.youtube.com/watch?feature=player_detailpage&v=ePgC91kcmNo

Part B - Now, in groups, discuss **one particular policy and practice development** you have been involved with, and identify how the above parameters and focal points for debate and discussion come into play.

Do any of the parameters have a particular bearing on the policy and practice under review? Where did the debates and discussions lead, and what were their conclusions?

Comments and thoughts box



3. Thinking critically about fairness

3.1 A case study: Council Tax Help for Pensioners Scheme

The following is a real case study which we would like you to read, before completing exercise 3 below in groups:

Newport City Council, at its meeting on 25 February 2014, reserved £160,000 from the Revenue Support Grant with a view to continuing the Council Tax Help for Pensioners Scheme, subject to the review and recommendation of the Fairness Commission. The following provides background information in relation to the Scheme.

In 2009, the Welsh Government, using its general powers under the Local Government Act 2003 (Section 31), commenced a scheme of grants to local authorities to provide assistance to pensioners with payment of their council tax. Such assistance for pensioners was an aim included in the 'One Wales' initiative. 'One Wales' was a generally 'progressive' agenda that aimed to form a 'fair and just society' by improving the lives of people in Wales. In this instance, the improvement was specifically directed towards one group in society.

In the first year of the Scheme, £2.0M was distributed to Councils on the basis of the Older Adults Formula used in the calculation of the Standard Spending Assessment. Newport's share at that time was £88,510. The total sum has risen over the years to £4.0M in 2013/14, with Newport's share being £156,891.

At the outset in 2009, each Council could decide in what way they allocated the grants to pensioners, on the basis of whom it was felt appropriate to assist. Across Wales, grants were, in the main, made to taxpayers who received partial Council Tax Benefit (CTB) (now Council Tax Reduction (CTR)), as a top-up to the reduction that they had already received on their bills. Entitlement to CTB/CTR is means-tested, and determined by income and capital in relation to household circumstances. The maximum entitlement is 100% of council tax payable, but many claimants receive a lower percentage which results in a 'partial' reduction. The rationale behind the decision to make grants to this group of taxpayers (i.e. those with less than 100% reduction) was that they comprised a group of people who were evidently financially disadvantaged, and could be readily identified from Council records without the requirement for an application process. Funds were therefore targeted effectively, and at a minimum administrative cost.

Some Councils decided to award discretionary grants to pensioners not in receipt of CTB/CTR, through an application process. In certain cases, the discretionary grants were paid simply on the basis of proof of age – 60 or 65 usually being the qualifying age; in other cases, entitlement was limited to applicants of a qualifying age who had less than a certain capital or savings level, for example £16,000 (the limit beyond which there was no entitlement to some social security benefits). This method of award was intended to attract taxpayers who had investments, but with a relatively low regular income.

A combination of both approaches had been used for Newport taxpayers up to 2012/13. Depending on the grant funding, between 1,500 and 2,400 Newport pensioners have been assisted each year, with a maximum grant ranging from £65.00 to £110.00 annually. The grants have been paid by way of a credit to the taxpayers' council tax accounts, thus reducing the annual sum to be paid. No taxpayer would have received a grant of more than the value of their annual bill, subject to individual grants being capped at a maximum, for example £110.00 in 2012/13.

In 2013/14, the Welsh Government decided to devise a consistent national scheme which resulted in payments only to CTR claimants aged 60 or over who were receiving a partial Reduction, with maximum grants set at £100.00. This resulted in the following levels of assistance being provided:

- A maximum grant of £100.00 being paid to 1,362 partial CTR taxpayers. (£136,200)
- A grant of between £5.00 and £99.99 being paid to 407 partial CTR taxpayers. (£20,691)
- Total of £156,891 paid to 1,769 taxpayers.

For 2014/15, the Welsh Government has decided to include a sum of money in the Revenue Support Grant and allow each Council to decide if a Council Tax Help for Pensioners Scheme should operate in its area. Newport City Council has been allocated £160,000 for this reason.

3.2 Exercise 3 – thinking critically about fairness when responding to the case study

Part A – Intergenerational justice - Have a look at the following YouTube clip and then discuss with your group members some of the issues raised about fairness

https://www.youtube.com/watch?feature=player_detailpage&v=7eNFCCqzOLq8

Part B – Now, in groups discuss the kinds of questions and issues which would arise around fairness, and as a result of either continuing *or* dismantling the above scheme. Whatever the decision, how do these questions and issues reflect the four parameters of fairness identified earlier? What would *you* do and why, in relation to fairness? Finally, as a result of considering these issues, what lessons have you learnt concerning *thinking critically* about fairness when developing policy and practice?

Comments and thoughts box

4. Appendix

The following is the Newport Fairness Commission's response to exercise 3 and the above case study in relation to the four parameters of fairness, and after considering (a) a briefing paper and presentation from council representatives concerning the scheme, considered at the Fairness Commission meeting on 19 June 2014, (b) points made by Commission members during the subsequent discussion during this meeting, and (c) further revisions and suggestions made subsequent to this meeting via e-mail exchange between Commission members.

Parameter 1 Equal treatment while recognising difference

Main focal points of debate: When is it fair to treat people the same, and when is it fair to treat people differently? What groups have priority in Newport, and why? And, if trade-offs and compromises are to be made between different group interests', how should these trade-offs be balanced?

Discussion points and issues to consider for and against the scheme

Is age a sufficient indicator or a morally relevant reason to treat this group favourably and so differently? The drift of this policy has been toward combining age *and* means as the marker for defining who gets what, but age still would carry weight if the scheme was continued, given that other younger citizens who had the same income/means as those entitled pensioners are not able to access the scheme. However, before these more principled questions are addressed, it was noted that other practical questions arise concerning how a claimant's means is measured accurately. These questions in turn raise concerns about trading-off quality targeting to ensure those with relatively low means receive this benefit, and the relatively high administration costs of implementing such a test of means. The NFC concluded that if the scheme was to continue then, given the relatively small amount of total monies involved, it was a fair use of resources to keep administrative costs to a minimum, even if this sacrificed to some extent, the accuracy of means-testing. Moreover, it was noted that a commitment to means-testing would be possible if the scheme was to continue, as means-testing (however accurately implemented in practice) is administered by central government through the benefit system (these tests being a first indicator to council concerning who is entitled to access this scheme).

Regarding more principle-based questions, these centre on whether there are any *other* reasons based on age, and in *addition* to means (and so *even if* means were *very* accurately measured), that would allow for justifiable differential treatment for

pensioners? Some of these reasons could be provided by the arguments and discussion points below, but there may well be other ones beside. For example, most/many pensioners are unable to access the labour market, unlike, it might be argued, younger persons with the same means who are defined as capable of work. However, a counter-response is that there are many younger people *already* in the labour force who are also poor and in need (in other words, are experiencing what is termed ‘in-work poverty’). The main general point is that council should articulate these *additional* reasons for giving this extra benefit to pensioners if it chose to continue the scheme, or say clearly why there were *no* additional reasons, if it chose to dismantle the scheme.

Parameter 2 Mutual obligations between citizens and local government

Main focal points of debate: What is the responsibility of local government to meet certain needs, and what conditions should apply to citizens, if any? And, which needs are to be provided universally (i.e. to all citizens) and which needs are to be met, in part or wholly, by citizens?

Discussion points and issues to consider for and against the scheme

The scheme is not universal and so the question is how this *targeted* provision reflects mutual obligations between citizens and local government, and how are needs precisely met by this scheme? In favour of the scheme, it might be argued, for example, that the younger population/economically active population has *special* obligations to older populations and that council’s policies should reflect this relationship. These obligations in turn could be derived from assumptions concerning, for example, older people’s likely increased need and vulnerability; that older people have already ‘paid their dues’ and so should receive extra benefits; that younger people have a duty based on, say, a generalised respect for old people to ensure the protection of the quality of life of older citizens. Against the scheme, (and drawing from discussion themes highlighted in parameter 1), it might be argued that age is *not* a special marker for favourable treatment in these ways, given the benefits older people have *already* received. For example, some old people are relatively well-off having received generous work-based pensions from either the private or public sector. Also, many old people have considerably benefitted both from the welfare state over the years (particularly perhaps in regards to education including Higher Education), plus have received large capital gains from home-ownership (benefits which, it might be argued, are not so readily available to younger populations); plus, that younger populations, in *any* event, may be just as vulnerable, in need of assistance, and so on.

In addition, it could also be argued that older populations will be increasingly indebted to younger populations for the costs of care for older people, and as these costs are likely to increase considerably in the future due to demographic change. So, in times of

economic austerity, it is quite proper for pensioners to bear some of the cuts *alongside* other younger citizens, and as the general obligation of *all* citizens, young and old, to pay into a ‘shared pot’ to provide for *all* citizens.⁷ The main general point here is that the council should identify precisely *how* and *when* these obligations to meet needs etc play-out, and whether there exists particular obligations of younger people toward older people, and if not, *why* not?

Parameter 3 Interdependency and reciprocity within community relations

Main focal points of debate: What is the value of participation in community life? How are citizens enabled to positively participate in the life of the community over periods of time, for their own and others’ benefit? And, how and when are equal opportunities and ‘life chances’ facilitated, so enabling citizens to participate effectively?

Discussion points and issues to consider for and against the scheme

Following from the points made under parameters 1 and 2, older populations of pensionable age are less likely to participate in paid work, but the question then becomes are there *other* kinds of activities outside of paid work which would/should count as participation? The answer from the NFC (and again as detailed in our full report to council) is that there are indeed many forms of participation outside of paid work which are valuable for maintaining and developing interdependent and reciprocal relations across our communities, and should also be facilitated by council. The next question is whether this *particular* scheme is the best vehicle for this latter policy goal, or whether the money might be better spent elsewhere? At this point the NFC notes that there are often tensions and conflicts with other parameters of fairness. For example, if the main reasons for identifying old people for favourable treatment were, say, the general obligations younger people have to this group because old people have *already* ‘paid their dues’, then it need not be a goal of the scheme to facilitate *further* participation of old people.

An additional issue is that the amounts paid to individual pensioners under the existing scheme, are often very small (as little as £5 a month), and so are not likely to be large enough to facilitate increased participation, however the latter was conceptualised.

⁷ It was also noted how politically (both nationally and locally) it was relatively easy *rhetorically* to defend a benefit for pensioners, given the public support for this group (with this support deriving from the *additional* reasons to means/need listed above, and no doubt others beside). Nevertheless, it was also noted how in political *practice* often monies earmarked for education (so targeted toward young people) have been explicitly protected by Government (both nationally and locally). The trade-offs made between these groups as a result, and even *within* these groups (as youth services and other non-statutory services for young people, for example, are cut), were also discussed in our full report to council.

Nevertheless, while economically these amounts may often not be significant to many pensioners, *symbolically* the payment still might ‘carry weight’, concerning, for example, the specific obligations toward older people outlined under parameter 2 above; and/or the diminished quality of *some* old people’s lives who have little income. The main general point here is that council should state whether, or the extent to which, facilitating participation should ‘carry weight’ in regards to this scheme; and/or, whether, or the extent to which, council should recommend alternative ways of spending this money (either for older people or other groups) which either better facilitates participation for these groups, or appeals to some *other* principle reflected in the questions and issues raised in parameters 1, 2, and 4.

Parameter 4 Transparency and accountability in decision-making

Main focal points of debate: How does Council ensure that the procedures for decision-making are fair, consistent and transparent? How does Council convey clearly and concisely to citizens the main decisions being considered and made? And, how are mature and meaningful channels of communication and exchange of views facilitated between the NCC and citizens?

Discussion points and issues to consider for and against the scheme

This parameter does not concern the outcome of decision-making, rather the *processes* by which the decisions have been made. Therefore, in addition to the above recommendations to council concerning how it should articulate its case either for *or* against the scheme (so contributing to the transparency of the decision made), the NFC also raises here additional questions concerning how far local populations (especially older people) were consulted over this proposal? Whether existing beneficiaries of the scheme will be protected, if it was to be phased-out, and if not, why not? And, if the money were to be spent elsewhere, how this *new* policy was decided, and what groups were consulted in the process? Regarding the latter question, the NFC is, of course, very aware of the financial constraints that Local Authorities are under at present. This financial pressure highlights, all the more, further questions about how internal prioritising processes are set-up to take the above issues of fairness into consideration as a matter of routine.

Finally, regarding process-based issues, if Council chooses to keep the scheme, how would the Council deal with applications? Will Council implement the scheme on a first-come-first-served basis until the pot is empty? The problem with the latter process is that those outside of the usual networks or communication loops are often at a disadvantage. The same question applies to those needing more help to complete forms etc.