#### **DRR Consultation Report**

#### **Background paper 4**

- Consultation ran for a 12 week period up to 25 September 2013.
- 107 responses were received. Full graphical data of all the Reponses can be found on from page 26
- Whilst nearly 70% of all respondents were in full or part agreement of the overarching eligibility criteria, written responses were received which has enabled us to adjust the policy to reflect some of the recommendations and responses. These responses with council officer's feedback can be found on pages 2-25 of this document.
- Most Arts based groups were in favour of the budget being devolved whereas those types of organisations who were
  described as Youth Groups and Other organisations were not
- Nearly 70% of all respondents agreed with the overall proposed Stage 1 criteria
- Nearly 60% of all respondents agreed with the overall proposed Stage 2 criteria
- Over 60% of all respondents agreed with the proposed Sports criteria at Stage 2
- Over 60% of all respondents agreed with the proposed Arts & Regen criteria at Stage 2
- Over 70% of all respondents agreed with the proposed CYPS criteria at Stage 2
- Over 70% of all respondents agreed with the proposed N&C criteria at Stage 2

Issue/Question	Text/feedback/comments	Our response
Have you any comment on devolving the DRR budget?	I'd completely think of a different strategy.	The proposal put forward was considered to be the best solution in terms of financial management of the DRR spend whilst ensuring that Corporate objectives are delivered.
	Youth services are essential for future good citizenship.	Noted, this is reflected in the policy.
	It shouldn't be devolved.	The council is funded via Council and Business Rate contribution. Discretionary Rate Relief (DRR) is awarded entirely at the discretion of the council, it does not
	It shouldn't be devolved. The above four directorates need the rates relief.	necessarily have to do so. We recognise the benefits the relief can provide to the council
	I would not devolve it in fixed amounts like this. I would prefer to see all applications treated on their merits.	and the citizens of Bristol, therefore it is necessary to ensure we supply a fit for
	Do not devolve it	purpose and workable policy to award the
	I would not devolve it in fixed amounts like this.	relief based on how each organisation will
	I would prefer to see all applications treated on their merits.	contribute to the councils strategic priories. The total budget is set to remain at circa £300,000.
	Devolving a large amount of the budget to Arts, Events, Films/Economy, Enterprise and Inclusion will mean that one department has a good overall picture of need, and can allocate funds fairly. Arts and culture contribute hugely to the quality of life of the citizens of Bristol. A relatively small in-kind investment in culture has a large boost on the local economy. Culture is the main determinant of Bristol's identity. Importantly, it attracts talent from all professional sectors to locate in Bristol. Many of the organisations that make culture happen in Bristol rely on DRR support. The supports makes a difference between culture happening or not. Whereas giving DRR support to other areas is unlikely to have such a large effect. Finally, cultural providers deliver huge outputs for low inputs. The sector is creative, dynamic and defined by the huge commitment of the staff, artists and volunteers involved. DRR support is critical to the activity of arts organisations. DRR support	We agree, the BOP independent impact report supports this.

Issue/Question	Text/feedback/comments	Our response
	often facilitates thousands of volunteers to be involved in a project that is experienced by tens of thousands of people. Direct DRR support is not going to be lost in amidst a large funding mix, but is the catalyst for the delivery of culture to the people of Bristol and beyond.	
	Bristol Shopmobility receives its funding through the Community Transport budget which is part of Corporate Services & chief Executives Dept - this is not mentioned above.	The Council funds a large number of voluntary and community organisations through grants and contracts. We are not devolving the DRR budget to each individual department within the Council, but are devolving it to Arts & Enterprise, Children & Young People, Sports and Neighbourhoods & Communities.
	As my previous statement, without knowing what the current need is for these groups it is difficult to allocate percentages based on guess work. I don't have enough information to comment.	Noted
	The proposed split seems rather arbitrary. Does it take account of organisations ability to pay?	The application process will take into account the financial status of each organisation.  Stage One financial assessment. The proposal reflects the Council's current strategic plan and priorities by continuing to support not for profit organisations, charitable groups and voluntary and community sector organisations with a shift of focus towards regeneration.  The budget has been devolved in this way to provide continuity of support to some existing groups and to better reflect the councils strategic priorities.
	Whilst a budget does have to be split it needs to ensure sufficient stimulation for children and young people for worthwhile groups, education and sport, whilst balancing the support for communities and Bristol economy.	We agree, the policy reflects this.
	Youth services are essential for future good citizenship.	

Issue/Question	Text/feedback/comments	Our response
	The percentage of the relief for the Arts, Events & Films/ Economy, Enterprise & Inclusion sector looks large but consideration should be given to the value that the organisations benefiting from rate relief bring to the city because of that relief: Employment, skills development, utilising difficult spaces that may not be suitable for young people or community groups, bringing people to their space and so improving the economy in a given area of the city as well as developing communities.	
	We feel this is a much fairer way of devolving the DRR budget	Noted
	The possibility of a reduction of a DRR is all the more likely as any new Directory learns of their new funding power.  It seems you've already decided to cut £300,000 so unsure of the advantages of this exercise.	The total budget is set to remain at circa £300,000.
	I disagree with the whole principle as we should be leveraging the volunteer sector to provide better value for Bristol residents from the council tax they pay, not discouraging volunteering. The fact that the increase in cost has largely come from the arts sector, which I am a big proponent of, shouldn't detrimentally affect the sports and youth sectors, who are currently taking a lower percentage, I understand.	The budget has encountered severe pressure due to a number of reasons. The first is a significant increase in applications from groups supporting the arts, some of which are now occupying previous long-term empty premises and with the increase of Sports Centres managed on behalf of the council. We realise that our DRR allocation will not be big enough to fund all the voluntary and community sector organisations that apply.
	As I am unable to see how much individuals/groups/organisations etc under each directorate currently pay, I cannot provide any realistic assessment.	Noted
	Without knowing who exactly benefits, the question is pointless. The issue I see is about whether something is a nice to have or essential. Activities like scouts are essential and my involvement with scouts includes some lower waged parent(s) who would struggle, yet they are the ones needing the service. NB My time is given up voluntarily for these kids, so it seems wrong for the council to tax us just for having a scout hut.	Agreed. We are keen to continue the support to this sector.
	The term 'devolve' is unclear and undefined	Devolving the DRR budget is another term for

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		'ring-fencing.' Each department will get a percentage share of the relief to be awarded
	If you provide a budget people will spend it. There needs to be a plan with development priorities and a bidding process that all can access.	DRR has been awarded since 1990. The policy is the councils plan in how better award the relief to organisation's and groups who better reflect the existing council strategic priorities.
	This is robbing Peter to pay Paul. If BCC wants organisations to provide in the community they should be offering support, not adding to the financial burden. In many of the above cases BCC is getting provision for free, they cannot have it both ways.	DRR allocation will not be big enough to fund all the voluntary and community sector organisations that apply. It is our priority to support those groups that contribute to one or more of the Council's strategic priorities for local people.
	Bristol has become renound for its creative sector, much of which has been facilitated by discretionary rates relief making disused council owned properties available as centres for creation. Without this resource Bristol won't benefit from creative tourism and people will visit other cities instead.	Noted
	I would be happier if it said "Arts, Events & Films" period. "Arts, Events & Films/Economy, Enterprise & Inclusion" is far to general. What does "Economy, Enterprise & Inclusion" mean, apart from everything.	The heading has been reworded to Creativity, Economy, Enterprise and Inclusion. The inclusion part is specifically about economic inclusion, ensuring that people from our most deprived communities and groups have access to economic opportunities.
	This is an unfair question as it is not possible to drill down into the percentages of your report, to assess the merit or not of each sector	No comment.
	I do not think this should occur - this budget provides valuable resources, training, employment and cultural richness to this city	The policy is outdated and the current freeze on applications means that new voluntary groups have not been able to apply for DRR since Sept 2012. A new policy is required to ensure the budget is being spent fairly across the various voluntary sectors which best provides the outcomes in the Corporate Strategy.

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	Youth services do not usually have any sponsors able to top up	We know this and are keen to maintain some support in this area.
	Perhaps budget should be balanced from elsewhere?	Unfortunately we do not have the budget from any other resource.
	Benefits to 5 and 7 would lead to people better equipped and more enthusiastic for participation in 4 and 6 above.	Noted
	Try to link and cross over the benefits as much as possible, for example enterprise initiatives for young people, or using some of the budget to train people in how to fundraise and crowd source additional resources and money. Thereby building their skills for the longer term. Always skills build to enable sustainability and resilience of enterprises, initiatives, projects. properties and ideas	Noted. The application process will allow for some area of cross over.
Stage 1 of the Policy Criteria	It will need to be made clear as to if financial support through Neighbourhood Partnerships counts as BCC support.	We will make this clear in the policy.
Cinona	What are 'charitable objectives'? We are constituted as a limited company structured as a cooperative, with not-for-profit and asset lock written into our Mem & Arts. We are not a charity as want the directors to run the company, not volunteer trustees.	Charitable objects is the term used to describe and identify the purpose for which a charity has been set up. If you are not a registered Charity then the policy states "If you are not properly constituted, you must identify clear and shared aims/vision for your organisation and show how they contribute to Bristol City Council's Corporate Strategy."
	I think the £250k turnover cut off is a very blunt way of working out whether an organisation can afford to pay rates. Looking at the potential tax liability as a proportion of turnover would make a much fairer assessment.	This has been considered. Anything which involves a more detailed check which assesses an organisations ability to pay will start to involve more and more
	Income generation should be the top priority as many voluntary organisations run with significant finance input from the volunteers!	judgments each of which may be justified on an individual basis but will increase complexity and therefore administration costs.
	Far too bureaucratic for smaller community groups as usual.	Whilst we understand that the providing accounts and other information could be onerous for smaller organisations, we are

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		committed to ensuring that only those groups in need of support are supported through DRR.
	The language you use in your criteria is impenetrable jargon specific to your organisation. Your organisation exists as a profit motivated corporation leeching wealth from all the hard working individuals and businesses in this city without any real accountability for how our money is spent and without any say for individuals and businesses in how our money is to be spent to reflect our own political sense of responsibility.	We have tried to address the jargon issue in our criteria and will provide links to explain some of the terms we will need to use that people may not be familiar with.
	How are communities in need defined?	People from deprived and disadvantaged communities. Taken from the Community Investment Strategy
	Also clarification as to whether accessible by communities in "need" applies where: the premises may not be within a "disadvantaged" area but all activities operating from the premises are open to people from areas of "disadvantage/need"	"Deprived and Disadvantaged Communities By this we mean not only communities in deprived areas of Bristol, but also communities which may be spread across the City and which may experience harassment or exclusion, for example the Lesbian, Gay and Bisexual community or the Somali community."
	Shirehampton Sailing Club is a dinghy sailing club. The Royal Yachting Association do not accredit clubs through a "Club Mark Certificate" in the way that the Rugby Football Union do. Shirehampton is affiliated to the RYA and a good number of our members as individuals do have RYA qualification. Some of these qualifications were obtained through courses arranged by Shirehampton Sailing Club and others were arranged by	We recognise that some clubs are not club marked, this had already been considered and is addressed under the matrix in the second part of point 1.
	other organisations or direct with the RYA. We do have Junior who are members of the club through their parents Family Membership. We have consulted the RYA and their legal department have informed us that the club does not need a Child Welfare Officer or individuals to be CRB checked because the children take part in the	We are not stipulating the need to have these policies in place, more rather the more you are organised the higher chance the DRR will be awarded.

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	sport with their parents.	
	It is not clear whether all the criteria must be met.  More information on the baseline is needed and its 'depending on' aspect	We will make this clearer in the paperwork
	I would like clarification of "exclusive benefit" - not entirely clear what this means.	This has been removed from the policy.
	Assistance to start up businesses, training etc.	This is already covered in the policy under stage 1 'G' and Stage 2 under Creativity, Economy, Enterprise and Inclusion
	Smaller grass roots organisations may not be as well 'organised' as bigger ones but still provide essential services. There are many 'charities' that claim large amounts in grant monies but little go back to the community.	For Environment and Leisure our priority is to support organisations which reflect the outcomes linking with the council priorities. We will not disadvantage against smaller groups. In time we propose being able to support groups to improve their governance. By having financial criteria which means that large organisations are not eligible for DRR, we hope to priorities small and medium organisations.
	I'm concerned about how much money it's going to cost to BCC and the groups and organisations applying administrate an overly complicated criteria like this. Buildings being rented out to artists and makers for studio and workshops space often have a much less formal structure/budget/administration structure than say a youth club or sports venue. Many artists' studios groups are a loose group of artists and makers who happen to rent individual spaces in a particular building, often providing differing types and levels of public and community benefit as individuals as opposed to as an organised group. These groups (if I can call them this) often don't apply for other types of funding/don't generate group or organisation revenue and have no administrator. We pay rent for individual or shared	We have taken into account the overly complicated criteria comment and have made amendments to the criteria which make them less complicated. However we will need to use some criteria to assess applications fairly and transparently as there is going to be less funding available than there has been in the past and we need good information to enable us to be able to make funding decisions fairly.

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	studio space - create art and artworks some of which feed into and	
	support our communities and all of which play an important part in	
	Bristol's cultural development. It is going to be very difficult for us to	
	meet strict criteria like the ones proposed here. I believe this will	
	result in valuable studio space being lost across the city as artists	
	are unable to rent affordable space and begin to work from	
	home/move to other cities/countries or even give up their practice. I	
	agree with some of this proposed strategy - for example the split of	
	the budget and the items mentioned in stage one - general	
	assessment (Proposed Bristol City Council Discretionary Rate Relief	
	Policy). However, I believe that if rates relief is going to continue to	
	be provided to artist studio spaces (and I believe very strongly that it	
	should) then a more accessible and flexible approach needs to be	
	developed. Many buildings currently being rented as affordable	
	studio space just don't have the capacity financially or otherwise to	
	meet this sort of criteria or provide the required documentation. I'd	
	be happy to discuss this further (Sally Reay representing Bristol	
	Creatives and an artist with space at Mivart Artists).	
	Arts development should be extremely important in particular space	
	for artists to rehearse, co-ordinate, network and be based.	
	We would like you to consider Creativity, Community& inclusion?	This is included in the policy.
	Specialist Assessment- says layer bureaucracy and cost to me,	DDD is asserted at dispretion of the assurable
	save the money and don't charge, thus no administration	DRR is awarded at discretion of the council.
	Professionals will have to be employed to fill in the application	We have chosen to award because we
	forms. This will be costly and take money away from the front-line	understand the benefits which the relief brings
	projects that DRR initially served to support. Why can't groups	to the community. We agree that the process
	looking to apply to DRR sit in front of a panel, having prepared, for	could be seen as long winded, and have
	example, a video documentary as support.	addressed that.  Whilst we understand that the providing accounts and other information could be onerous for smaller organisations, we are committed to ensuring that only those groups in need of support are supported through DRR.
	The very nature of such organisations means that often there are	
	perhaps a few people in the organisation who will be doing an	
	multitude of tasks in making the organisation work. We recognise	
	that the stages outlined must be applied, but also see the	
	administrative burden that this places on already busy people, often	
	volunteers. There is an annual 'stress' for recipients waiting to hear if	DIXIX.

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	they are to receive the DRR or face potential closure through lack of funds. Is there a way to alleviate this?	
	You have not set out the constraints, the rules could be unrealistic for each criteria, this you have not defined.	Notes will be provided for application purposes. We believe the criteria is realistic and allows for the outcomes of each groups to be considered. It is our priority to support those groups that contribute to one or more of the Council's strategic priorities for local people.
	Many of the groups that use these spaces are not for profit organisations and are only starting out - imposing such established corporate measures of assessment will mean that many groups will simply not get off the ground	The criterion offers scope for start-up groups to be considered.
	Sports development is covered, but what about artists excellence, or arts development for the city?	Arts excellence is covered in the policy under Creativity, Economy, Enterprise and Inclusion.
	There should also be an element of outcome and beneficial support in regards to youth work and support.	In Stage 1 of the process there will be a basic assessment of how the organisation contributes to the Council's strategic outcomes. The applications will then be forwarded to the relevant department. It is likely that applications from organisations delivery youth work will be forward to Children & Young People's Services.
	This is not in plain English; I don't really understand the question. Do a better questionnaire with less jargon so we can understand it.	We are sorry that you found the process unworkable. We will reconsider the wording to make the policy and application process simpler easier to follow and complete.
Sports (Environment & Leisure) criteria	Do not believe that Insurance is as critical as the others.	For Environment and Leisure we believe that insurance is critical which is why it is included as part of the matrix scoring system. We have included it We have included this criteria

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		about trustees because we want to encourage
		good governance.
	Also Club Characteristics seems a fairly meaningless phrase and would need clarification	
	A full definition of these titles is required - Club Characteristics	We agree, we will reword this.
	seems vague. But, with a definition it may be clear.	
		For Environment and Leisure we believe that
		the matrix system will provide a fair
	These seem of low value compared to the stage one criteria. An	assessment of the clubs outcomes linking
	organisation can have a lot more to offer than income generation, for	with the councils priorities.
	example.	Income generation, for example, shows how each groups has considered its long term stability.
	Small organisations should not be required to jump through too	Whilst we understand that the providing accounts could be onerous for smaller
	many hoops and the process should not be too demanding or	organisations, we are committed to ensuring
	bureaucratic. Very small organisations with minimal premises can	that only those groups in need of support are
	make a real difference locally with little money at their disposal	supported through DRR.
	I don't understand this at all. What are the details? Is a positive score	We will reconsider the wording to make this
	in all criteria needed? Other reasonable criteria seem to be missing.	part clearer.
Arts, Events & Films/		We will reconsider the wording to make this
Economy, Enterprise	Is the property empty or likely to be empty for a significant period of	clearer. This criteria refers to bringing empty
& Inclusion criteria	time?" Just because an organisation meets only a few times a week	premises back into use. Part of the councils
	does not mean it is not meeting a valuable need.	regeneration strategy is to encourage
	a valuable floor	occupation of previous long term empty premises.
		We recognise that some groups may not be
	Low concerned that amall argeniactions about he gales of the first way.	entitled to relief moving forward, and the
	I am concerned that small organisations should be asked to find way to pay Business Rates. Our club is unlikely to survive if we had to pay Business Rates	negative effect of that may mean some
		groups will need to consider their future.
		We will make decisions about funding based
		on the eligibility criteria.
	Regarding point iv) does everything have to hark back to business	We believe that the application process fully

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	and wealth in order to be successful? The Arts is about more than that. The council need to send someone over to see the work people do, pop down to open days see the benefits with their eyes. 12 weeks does not necessarily show the full extent to the benefits of these rates.	allows for the outcomes of each groups application to be considered.
	Vacant shops still will attract higher rateable value which involves a greater cost to organisations	Whether a shop is vacant or not, the rateable value remains the same until the Valuation Office Agency reassesses the value of the premises.
	I agree with some of these points but not all of them. Affordable artist studio space won't by its very nature have a business model that enables it to not rely on rates relief in the future. Its purpose is to provide affordable space. BCC and the Arts Council funded a research project and report about affordable studio space provision in Bristol a few years ago - please refer to this.	The amount of funding available for rates relief is small and we are keen to be able to support as many organisations as possible. We are therefore interested in seeing where organisations can work towards not being 100% reliant on rates relief in the future. This is reflected in the criteria in the policy.
	I am wary of the 'brand of Bristol'. This can often be a synthesised label used in conjunction with profit making businesses (such as bars), Bristol has a very strong independent arts scene which should be valued on it's own merits and not adopted as a brand.	The Bristol brand we refer to here is all about the small, independent and unorthodox organisations that give Bristol it's cultural identity. We recognise that DRR has in the past been essential to the growth of these organisations and we are keen that we continue to support them through DRR.
	We agree in the main. We are concerned about all the buildings needing to be in particular areas only - it is important in several cases that to engage widely, and to deliver impact against organisational and BCC priorities, that the buildings are accessible (good public transport routes etc) and visible to the city. For example the Bristol Festivals Office needs to be sited prominently to gain the impact required for Bristol's Festivals both locally, nationally and internationally. It would also need to be prominently sited for us to engage with a huge number of people (both volunteers and as an info point) and thus deliver impact for the people of Bristol and for Bristol internationally. We would also be concerned about the need	We will consider other outcomes along with the physical area in which the group is based. There may be opportunities for some organisations to generate an income which can be used to reduce BCC investment in DRR for that organisation. This saving can then be used to support another arts organ isation looking for DRR.

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	to plan for transitioning off DRR subsidy entirely. In the face of recent funding cuts to the arts, DRR is, in many cases the only form of BCC support offered to organisations. We would argue that the Arts like any other service will always need a level of investment to make it accessible, excellent, and to engage with a wide number of people. Whilst we support a sustainability drive, it would be naive to think that great art can happen without any investment. If culture is a priority for the city, and we believe that it should be, then the city needs to invest in culture, like any other service.	
	I do not believe that it should be necessary to meet all of the criteria. For example, supporting the development of digital technology is very prescriptive and not applicable to every arts group. Also what if the property was originally empty, but the work of the organisation has built the profile of the immediate area, then making the property desirable to developers again? Is there a safeguard to ensure if an organisation truly transforms a space/building they then won't be made to leave?	Agreed, we will ensure the wording is clearer. The criteria is for all types of organisations not just arts. All the criteria are weighted and each application will be considered on its own merits.  No safeguard, but organisations making particularly valuable use of a building can nominate the building they operate from to be considered as an asset of community value.
	This criteria may apply to some sports clubs may. Example: The members of Shirehampton Sailing Club keep the Shirehampton Slip of the old Pill Ferry open. This is a listed structure and is a public amenity. Without our work the slip would be silted up by the river Avon in a very sort time and most people who walk along the river would not know it was there. How can our work in this area be reflected in the matrix?	We agree. The Sports matrix policy will be amended to reflect this.
	How many of the criteria must be met? How can subjectivity be avoided?	We agree that this wasn't clear. A scoring matrix has been created for Creativity, Economy, Enterprise and Inclusion.
	The criteria may disadvantage existing organisations, or organisations that have to be in areas of high occupancy. In some cases these organisations may have been partly responsible for the improvements in an area which will now negatively affect them.	The criteria will be weighted. We need to use the budget in a more balanced way and be able to fund innovative ideas.
	Again the system seems to be overly complex for the value of money	Noted. However to ensure that the system is

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	being discussed. The measures also seem to be open to interpretation, being qualitative rather than quantitative.	as fair as possible and to make objective decisions we have to ask for applications against certain criteria. We consider the proposed policy to be the most effective way of determining awards of DRR.
	Point 3: 'Is the property in an area of deprivation' and/or priority growth area as defined in the Bristol Employment & Enterprise Strategy needs to be carefully considered. Successful Organisations such as The Parlour on Park Street in Central Bristol have benefited from DRR & brought value to the city. Its central location has been key to their success. Alongside a programme of work, The Parlour has provided a base for emerging and established artists & companies in Bristol, who in turn have worked with established local, national and international artists. The Parlour has provided a hub for two very successful international festivals (IBT13 and Mayfest). The central location had made this high level work possible.	The criteria will be weighted. Not everyone has to meet all the criteria, the more criteria met the more the greater likelihood of getting full relief.
	Continuance of active and healthy community groups in not so deprived areas also adds huge value to the City	Agree, it's just one of the criteria.
	In particular "How does the organisation plan to become less dependent on discretionary rates relief in the future?" Only certain projects can become self-funding.	This point does not expect organisations to become completely self-funding but just encourages organisations to think about how they can become less reliant on DRR in the future. We have a finite pot available and are keen to support as many organisations as possible. Organisations need to do their bit and consider alternative ways to generate income so there is more left in the DRR pot to support other organisations.
	Why is digital technology important	It's just one of the criteria, but an important part of the inclusion agenda.
	They are unhelpful for an organisation such as ours, where we are seeking to provide services at minimum cost to our clients.	The criteria and application process covers this.
	Many buildings are unused or cannot afford to open on certain days	We want to provide opportunities within local

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	of the week. We would hope that this could be factored into the discretionary rate relief, so as to open up prime buildings (e.g. large, well located, etc) that would otherwise be shut off to the public and unavailable for charitable/community orientated projects. In addition, buildings that are centrally located often offer better accessibility than those located further out - it would seem unfair to disadvantage highly accessible and well transport connected buildings.	communities and award relief to the organisations who best support the outcome of the Strategic Priorities.  However, larger buildings attract larger rate bills and if successful a larger negative affect on the DRR spend.
	I do not understand why the application of the discretionary rate rebate should automatically allow the council to use the beneficiary as a promoter of council priorities.	The Discretionary Rates Relief funding comes out of BCC funding. The council has responsibility to ensure that any money we spend supports us in achieving our priorities for Bristol.  The Council wants to use its funding to invest in community organisations which are of value in terms of helping to meet the city's priorities.
	Is it offering something a bit different or useful in a different way to other existing organizations	The new policy is offering relief to different types of groups than it has previously done.
Children & Young Peoples Services (Youth) criteria	I don't agree with the emphasis on young people, the whole community should benefit	Our priority is to support local voluntary and community sector organisations that contribute to one or more of the strategic priorities for local people.
	Not fair to directly specify children and YP	We realise that our DRR allocation will not be
	The 75% figure could disadvantage groups based on the outskirts of Bristol (eg adjoining South Glos) and it would be wrong for Council boundaries to have such an undesired effect. Why is the evidence of children/young people so necessary as opposed to other vulnerable, physically challenged adults? This should be removed in favour of the broader categories which the Council supports.	big enough to fund all the voluntary and community sector organisations that apply. The way in which the DRR is to be devolved means that funds will be 'ring-fenced' for Arts & Enterprise, Children & Young People and Sports. Although young people have been separately listed (for this purpose only) other groups will be considered under the criteria.
	Agree to part i) part ii) We are a collective of artists, we are not bureaucrats, the nature of the events and the services we provide is not conducive to filling in forms to prove what we do. How do we prove the quality in what we do? Can you show this on paper?	We have considered the feedback and acknowledge that there are other ways in which these outcomes could be met.  However, it remains our intention to support

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		those groups which better reflect the outcomes from the Corporate Strategy. We will make decision on funding based on evidence of outcomes and how they fit into our Corporate Strategy.
	I agree fully, however trying to 'quantify' local engagement with young people is like pulling teeth.	Noted
	Should aim for a higher percentage of Bristol beneficiaries to get the relief  There seems a lot less criteria in this section, and the evidence statement could be interpreted in any number of ways. I think, if Bristol is supporting Children & Young People then a much higher percentage should be resident. I would suggest 90% I think that if Bristol tax payers are funding organisations or looking to support through NIL tax then the % should be higher regarding residents of Bristol min 80%  As long as there is some provision for young people who come into Bristol for specialist projects that are not available in rural locations.  Numbers should not matter. Groups that are struggling should not	For Children and Young Peoples Services, our priority is to support local voluntary and community sector organisations that contribute to one or more of the Council's strategic priorities for local people. Therefore we have reworded to:  No fewer than 90% of an organisations members / beneficiaries must live or work within the area contained within the Council's administrative boundary. For those organisations that are located near the administrative boundary, we will count residents of the greater Bristol area – i.e. those of South Gloucestershire, North
	have additional financial burdens  The criteria should take into account those who work in Bristol as well as those who live in Bristol. People who work in Bristol as well as those who live Bristol bring wealth to the city.	Somerset or Bath & North East Somerset Council's – as residents of Bristol.
	Not sure the second point is a) a good question b) relevant to the first c) a useful criteria for whether an organisation is legible for relief. Why is the same not considered regarding the elderly?	Other community groups within our city will be supported by the policy and are covered in other areas of the process. See the Neighbourhoods & Communities criteria.
	Are any care leavers or children in care. Are you commissioned by BCC	We are not quite sure of the meaning to this comment. However, we can confirm we are not commissioned by BCC, DRR is a statutory obligation to consider.
	Some things are hard to evidence and it will only lead to excess bureaucracy	Noted, however the proposed policy has to be fit for purpose hence the additional evidence

Issue/Question	Text/feedback/comments	Our response
		requirements.
	Young people should be taken into account but projects that don't work with young people should also be taken strongly. As often for an arts scene to thrive meaning everything towards young people brings down the standard of the art itself and take up time. Unless the organisation itself is passionate about it / has young people as one of it's aims.	Agreed. Other groups are considered separately under the policy.
	You would need to take into account the type of club and the activity that they do as to determine the extent of children & young peoples involvement	Agreed.
	While the aim of the second criteria is admirable, the latter part is again subjective, and therefore difficult to measure and quantify (which again will add time and cost for all parties).	Our priority is to support local voluntary and community sector organisations that contribute to one or more of the strategic priorities for local people.  We are committed to ensuring that only those groups in need of support are supported through DRR. We believe this application process is fit for this purpose.
	Surely this should be a Bristol only grant other councils have their own thing	DRR is awarded for Bristol Business Rate payers who are set up for a not for profit/charitable/voluntary basis at the discretion of the council.
	How will you set levels of the number of young people and measure quality?	Following other consultation feedback we have amended the criteria to no fewer than 90% of an organisations members / beneficiaries must live or work within the area contained within the Council's administrative boundary. For those organisations that are located near the administrative boundary, we will count residents of the greater Bristol area – i.e. those of South Gloucestershire, North Somerset or Bath & North East Somerset Council's – as residents of Bristol.

Issue/Question	Text/feedback/comments	Our response
		Quality will be measured using an
		assessment of Baseline standards in stage 1.
		Scouts as a registered charity are entitled to
	None of this is BCC business but Scout Association business	80% mandatory relief on their rates bill. It will be up to each group to make an application
		for the additional 20%.
	add iii) what steps will be taken to ensure efficient resource use and re-use, efficient energy use and minimisation of waste	This has been included in the criteria.
Neighbourhoods & Communities criteria		We realise this. For Neighbourhoods and Communities our
Communities officia		priority is to support local voluntary and community sector organisations that
		contribute to one or more of the strategic priorities for local people.
		We realise that our DRR allocation will not be
		big enough to fund all the voluntary and
		community sector organisations that apply.
		The way in which the DRR is to be devolved means that funds will be 'ring-fenced' for Arts
	Not all organisations support the Council's priorities by resulting in	& Enterprise, Children & Young People and
	local people being more actively involved in their community, or	Sports. Therefore for Neighbourhoods &
	being healthier, or feeling safer or being better resourced to manage their lives	Communities we will focus on those that
	then nves	contribute in one or more of the following ways:
		,
		<ul><li>(1) Active and Creative</li><li>(a) Promoting community engagement of</li></ul>
		people in the most deprived or disadvantaged
		communities with the civic life of the City
		(2) Caring. Protecting and Safer
		(b) Enhancing the physical or mental well- being of people in the most deprived or
		disadvantaged communities.

Issue/Question	Text/feedback/comments	Our response
		<ul> <li>(3) Green &amp; Sustainable</li> <li>(c) Making our most deprived communities greener, cleaner and more sustainable.</li> <li>(4) Learning &amp; Working</li> <li>(d) Offering education opportunities for all citizens, particularly those people in the most deprived or disadvantaged communities.</li> <li>(e) Engaging people in opportunities to volunteer and become involved in their communities.</li> <li>(5) Moving &amp; Connected</li> <li>(f) Enabling digital inclusion for people in the most deprived or disadvantaged communities.</li> <li>(g) Improving the transport options of people in the most deprived or disadvantaged</li> </ul>
	Limits to companies with trustees (i.e. shorities), other types of	communities.
	Limits to companies with trustees (i.e. charities) - other types of projects that do just as much good work that, for one reason or another, are not structured as a charity.	For Neighbourhoods and Communities our priority is to support local voluntary and community sector organisations that
	Why is that rule about the trustees like that?	contribute to one or more of the Council's strategic priorities for local people. Voluntary and community sector organisations will all have been set up as 'not-for-profit' but do not have to be registered charities. We have included this requirement about trustees because we want to encourage good governance.
	Again we are concerned about item iv (The question is 'How does the organisation plan to become less dependent on discretionary rates relief in the Future?')	We agree that this is hard for organisations to show and for us to judge how they will become less dependent on discretionary rate
creating a better society, community and environment	iv) for an organisation that is not for profit and based solely on creating a better society, community and environment it is hard to imagine that paying business rates should ever be part of the	relief. Therefore we are removing this from our criteria.

Issue/Question	Text/feedback/comments	Our response
	business planit is a land tax and organisations like Coexist should be protected from it	
	Need to be clear about point iv for organisations where it may not be possible for valid reasons to become less dependent. The word "dependent" is quite negative - DRR award could alternatively be seen as "enabling".	
	Clause (ii) is limiting for organisations such as ours, with a national outreach; while our basic pioneering work has been undertaken in Bristol we have an important outreach in deprived areas in Lancashire; we are now planning a major innovation together with Bristol residents.  (The question is 'Are at least 75% of the organisation's beneficiaries residents of Bristol')  We suggest this clause be redrafted to state:  ii) Are a significant proportion of the organisation's beneficiaries residents of Bristol?  a. agree to an extent however pulling in the smaller Arts studios to do the job of the council ie. keeping the numbers(results) of the people we reach, providing services that the council is cutting back on.  b. agree  c. agree  d. we will need support from the council in order to see how this might be possible, in the current structure this is not possible, so the question seems harsh. If the council is able to help small organisations with support long term to make the most of what we have then possibly this can be seen as a future option, but under what time scale? will this take into account the full relief? We will not be able to exist without the rates relief to some extent, there is no way that the individuals will be able to afford the full business rates for what we do.	For Neighbourhoods and Communities, our priority is to support local voluntary and community sector organisations that contribute to one or more of the Council's strategic priorities for local people. The criteria relating to the number of the organisations beneficiaries has been amended to no fewer than 90% of organisations members / beneficiaries must live or work within the area contained within the Council's administrative boundary. For those organisations that are located near the administrative boundary, we will count residents of the greater Bristol area – i.e. those of South Gloucestershire, North Somerset or Bath & North East Somerset Council's – as residents of Bristol.  As above, we will remove the requirements for organisations to show how they will become less dependent on discretionary rate relief in the future.

Issue/Question	Text/feedback/comments	Our response
	Think there should be some level of documentation for this segment. Why is there no requirement to document the purpose and intention of the organisation requesting DRR Also per my previous answer - a 90% percentage is a better target for Bristol residency	For Neighbourhoods and Communities, our priority is to support local voluntary and community sector organisations that contribute to one or more of the Council's strategic priorities for local people. The
	I think having a catchment area around Bristol for people who commute but mostly spend their money and time in Bristol should be taken into account i.e. there should be some flexibility on the 75%.	critieria relating to the number of the organisations beneficiaries has been amended to no fewer than 90% of organisations members / beneficiaries must live or work within the area contained within the Council's administrative boundary. For those organisations that are located near the administrative boundary, we will count residents of the greater Bristol area – i.e. those of South Gloucestershire, North Somerset or Bath & North East Somerset Council's – as residents of Bristol.
	Once again the process is overcomplicated and authoritarian presented in language that doesn't make sense to most ordinary people.	We agree and we will change the language so that it is clear and makes sense.
	iii) I think the neutrality in this point is very important. iv) Support for organisations would be valuable. (the question is ' Does the organisation confirm that they will not use the rateable premises for religious proselytising or for political purposes')	Noted. For Neighbourhoods and Communities, we will consider applications for discretionary rate relief (DRR) from faith organisations, but we will not grant DRR if the premises are to be used for religious
	iii) it would seem strange to not allow organisations who benefit from rates relief to rent space to groups that can be considered as religious or political the criteria should be based on organisations who are aiming to bring benefit not to the exclusion of people who may have beliefs or political views!	proselytising (evangelising). We will also not grant DRR to organisations which are engaged in political activity.  These are standard requirements in our grants to the voluntary and community sector
	Need to be clear about point iii for buildings that rent space to religious / spiritual groups.  Expand residents of Bristol to include those who work in the city.	and serve to maintain the Council's neutrality.  For Neighbourhoods and Communities, our

Issue/Question	Text/feedback/comments	Our response
	Small clubs will find it difficult to survive if DRR is not available.	priority is to support local voluntary and community sector organisations that contribute to one or more of the Council's
	See previous comments about discriminating against organisations who have their base close to the City Council boundary which is not necessarily recognised by the members of that group or the people that they help/benefit.	strategic priorities for local people. The criteria relating to the number of the organisations beneficiaries has been amended to no fewer than 90% of organisations members / beneficiaries must live or work within the area contained within the Council's administrative boundary. For those organisations that are located near the administrative boundary, we will count residents of the greater Bristol area – i.e. those of South Gloucestershire, North Somerset or Bath & North East Somerset Council's – as residents of Bristol. For Environment and Leisure the sports matrix will be amended to include membership numbers.
	We would question whether points 4) and 5) are appropriate and/or necessary, believing that the first three criteria are adequate and sufficient on their own.  With regard to point 4) an organisation may not always be able to demonstrate that it has a plan to become less dependent on rates. Simple charitable organisations do not necessarily engage in planning and forecasting activities and to require them to do so would create an additional burden. Similarly, a simple charitable organisation such as a community centre, does not necessarily have much control over its income and so would struggle to provide evidence that it was going to be able to increase income in order to demonstrate a decreasing dependence in the future.	We agree that this is hard for organisations to show and for us to judge how they will become less dependent on DRR. Therefore we are removing this from our criteria.  For Neighbourhoods and Communities our priority is to support local voluntary and community sector organisations that contribute to the Council's strategic priorities for local people. Voluntary and community sector organisations will all have been set up as 'not-for-profit' but do not have to be
	We believe funds should be allocated based on the value the organisation brings to the community as demonstrated at the time of the application. We are concerned that criteria 4) would essentially	registered charities.  We have included this criteria about trustees because we want to encourage good

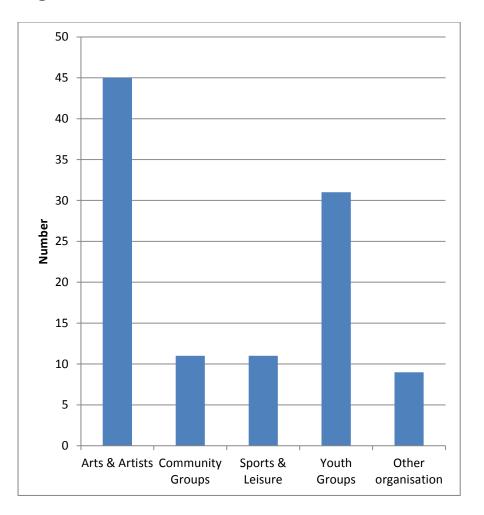
Issue/Question	Text/feedback/comments	Our response
	introduce a tesf the sophistication and commitment of the management structure rather than of the value of the underlying organisation to the community.	Governance.
	With regard to point 5) we believe that the first stage assessment is sufficient for ensuring overarching eligibility and satisfactory governance and that to introduce further governance criteria at the departmental level creates an 'uneven playing field' and more confused assessment methodology when considered across the council as a whole. In particular we are concerned that this criteria may discriminate against small organisations which, though offering valuable services, can from time to time struggle to find a sufficient number of volunteers willing to sit as trustees.	
	iii) it would seem strange to not allow organisations who benefit from rates relief to rent space to groups that can be considered as religious or political. The criteria should be based on organisations who are aiming to bring benefit not to the exclusion of people who may have beliefs or political views! iv) for an organisation that is not for profit and based solely on creating a better society, community and environment it is hard to imagine that paying business rates should ever be part of the business planit is a land tax and organisations like Coexist should be protected from it.	For Neighbourhoods and Communities, we will consider applications for discretionary rate relief (DRR) from faith organisations, but we will not grant DRR if the premises are to be used for religious proselytising (evangelising). We will also not grant DRR to organisations which are engaged in political activity. These are standard requirements in our grants to the voluntary and community sector and serve to maintain the Council's neutrality.
	Are services commissioned by BCC	This is not about commissioning services; it is about deciding how to award discretionary rate relief.
	Expecting organisations to reduce their dependence on DRR means that the costs will just go back to Bristol tax payers in another way. If the organisation is approved, can't they have that status for 5 years say, before having to re-apply?	As above, we will remove the requirements for organisations to show how they will become less dependent on discretionary rate relief in the future.
	Many Scout groups are part funded/supported by churches & so removal of rate relief from both church & scouting organisations will be a double wammy, this will affect what extra events the organisations can put on for young people	DRR is not being removed from scouting organisations. These organisations are being prioritised for rate relief by Children & Young People's Services.
	what happens to youth premises used for 'Elections', is this political	No, Elections are neutral (i.e. they are not

Text/feedback/comments	Our response
purposes	promoting the views or objectives of a political party).
None of this is BCC business, but should remain Scout Association business	Scouts as a registered charity are entitled to 80% mandatory relief on their rates bill. It will be up to each group to make an application for the additional 20%.
In our case we may struggle with the trustee criteria as the organisation was constituted in excess of 25 years ago - we hope there is some leniency here as, having investigated changing the constitution for this, it is prohibitively expensive.	We have included this criteria about trustees because we want to encourage good governance. You may be able to get some guidance from Voscur about making your constitution fit for purpose.
add iii) what steps will be taken to ensure efficient resource use and re-use, efficient energy use and minimisation of waste.	Unfortunately we would not have the capacity to assess this criterion within this process.
Having read the EqIA I am deeply concerned that there appears to have been not consideration of which impairment groups are not able to access the existing DRR supported organisations in you equalities statistics/baseline, not the likely lack of buildings' accessibility in areas requiring regeneration.  I am also interested to know if BOP have been asking such questions of the organisations involved in the more in depth interviews/focus groups.	The process has shown that baseline data is sparse in relation to equalities monitoring and the beneficiaries of Discretionary Rate Relief. Our recommendation is to explore how best to collect this information for future use. BOP did not ask questions relating to access as part of the focus groups but there was a question in the survey which asked organisations to tell us a breakdown of their audience by equalities groups. This data will be added to the EqIA
Can you please advise that if this proposal is agreed what will be the short, medium and long financial impact on the following:  I. All buildings currently being prepared for CAT transfer such as Eagle House Youth Club.  II. All community buildings within the city that are currently being run on a voluntary basis by community champions for the benefit of the local community, such as Filwood Community Centre. (Recent CAT)	As long as an organisation is a registered charity (or a similar legal structure), they will qualify for the 80% reduction.  The discretionary relief (the other 20% of the annual business rates bill) is the subject of the consultation.  We are advising orgs that express an interest in CAT or are looking at taking on new premises to budget for 20% of the annual biz rates bill for their property, as there is no longer a guarantee that this discretionary element will definitely be awarded again in the future.  This could potentially affect organisations s that already have a
	None of this is BCC business, but should remain Scout Association business  In our case we may struggle with the trustee criteria as the organisation was constituted in excess of 25 years ago - we hope there is some leniency here as, having investigated changing the constitution for this, it is prohibitively expensive.  add iii) what steps will be taken to ensure efficient resource use and re-use, efficient energy use and minimisation of waste.  Having read the EqIA I am deeply concerned that there appears to have been not consideration of which impairment groups are not able to access the existing DRR supported organisations in you equalities statistics/baseline, not the likely lack of buildings' accessibility in areas requiring regeneration.  I am also interested to know if BOP have been asking such questions of the organisations involved in the more in depth interviews/focus groups.  Can you please advise that if this proposal is agreed what will be the short, medium and long financial impact on the following:  I. All buildings currently being prepared for CAT transfer such as Eagle House Youth Club.  II. All community buildings within the city that are currently being run on a voluntary basis by community champions for the benefit of the local community, such as Filwood Community

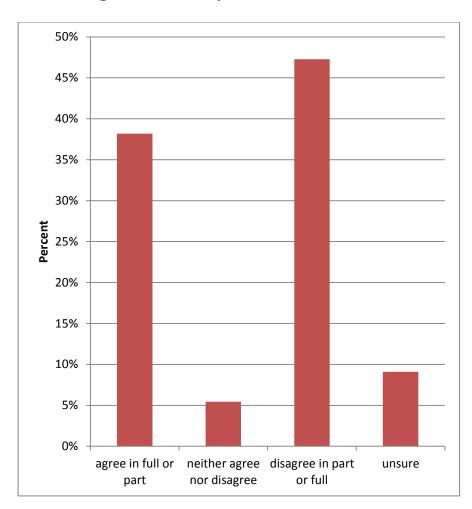
Issue/Question	Text/feedback/comments	Our response
	various community aspirations such as Whitchurch Folk House Association.	property from BCC (either CAT or who pay a full market rent) and orgs that have a private landlord.
		However, only organisations with a limited turnover have qualified for the discretionary relief in the past, the policy includes a similar cap.
		Organisations with a turnover that exceeds the threshold have never benefited from discretionary relief in the past and will not benefit in the future.
		The main impact is likely to be on small organisations that have large premises. They would have a correspondingly larger business rates bill and it is possible that their discretionary relief may not be granted in full, or at all.
		An organisation's reserves will also affect the amount of discretionary relief they may have been awarded in the past. This will also be taken into account in the future.
		Rather than have a one-size-fits-all BCC policy that is administered centrally, the new policy devolves the DRR spend to the appropriate departments who will then allocate the relief based on the outcomes of the organisations and how those outcomes fit into the Councils Strategic Priorities.
		Organisations need to meet certain criteria and need to deliver tangible outcomes. Rather than being awarded relief regardless of their activities, the organisations will in future be asked to demonstrate that they contribute towards the council's strategic objectives and to outcomes that make a difference to their community.
		The best advice we can give voluntary/community organisations is to register as a charity if they aren't registered already. This will ensure they benefit from the 80% reduction.
		The other advice is that organisations need to be well-managed and have a clear purpose, as in the future discretionary relief is more likely to be awarded to organisationss that are properly run, meet certain quality standards and that deliver the kind of services/activities/outcomes the council wishes to support.

#### **Graphical Display of Consultation**

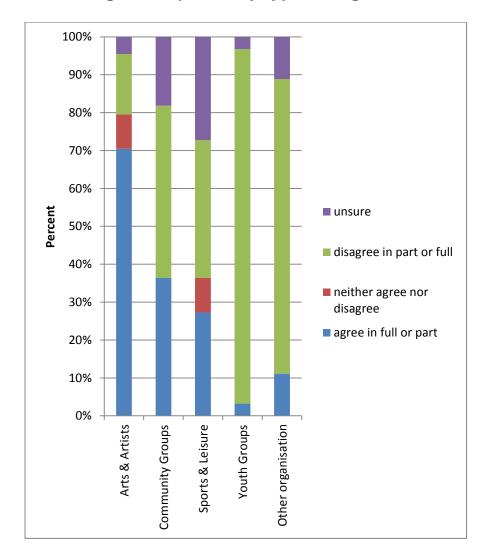
# Which of the following best describes your organisation?



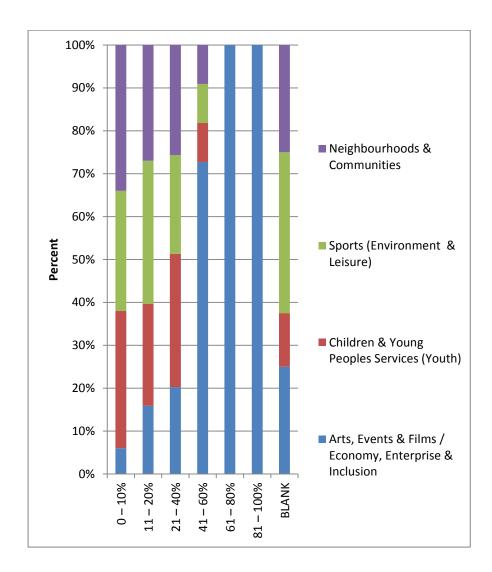
# To what extent do you agree with devolving the DRR budget in this way?



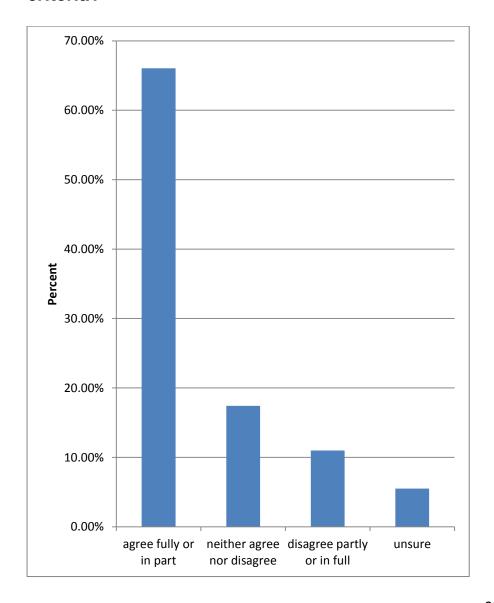
# To what extent do you agree with devolving the DRR budget. Response by type of organisation.



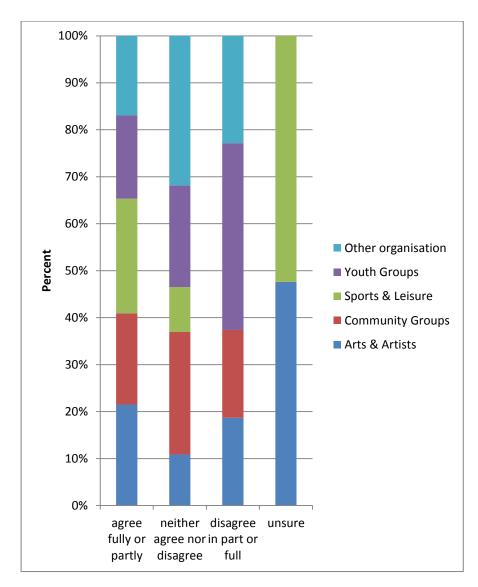
#### I would devolve the following percentage to:



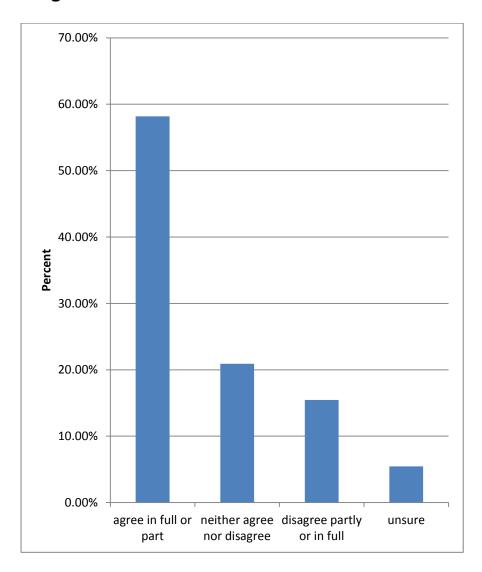
## To what extent do you agree with the Stage 1 criteria?



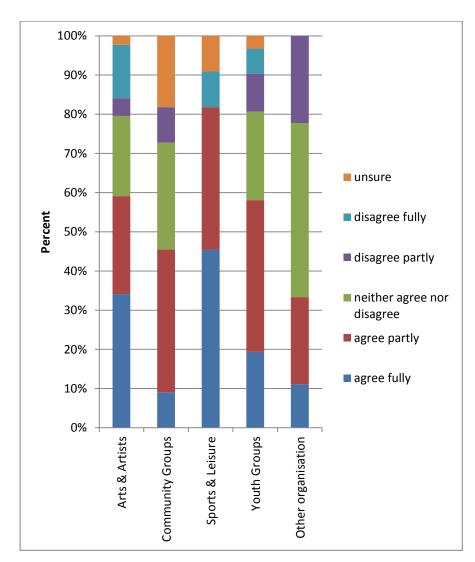
# To what extent do you agree with applying the Stage 1 criteria - by Type of Respondent



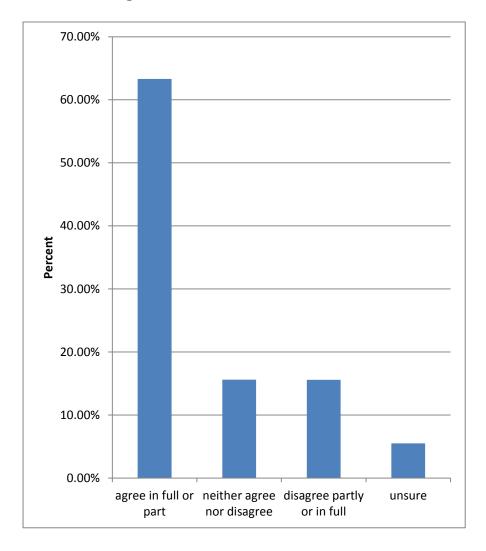
# To what extent do you agree with applying the Stage 2 criteria?



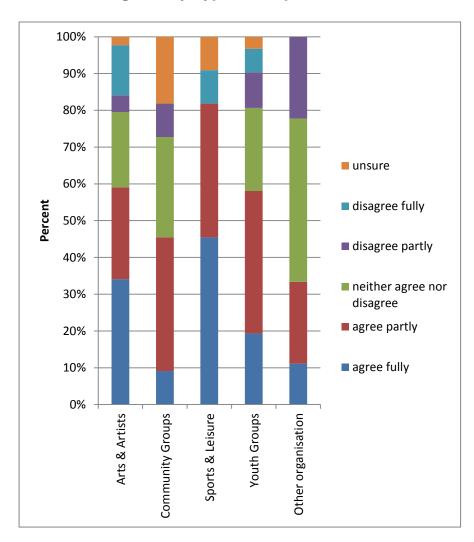
## To what extent do you agree with applying the Stage 2 criteria - by Type of Respondent



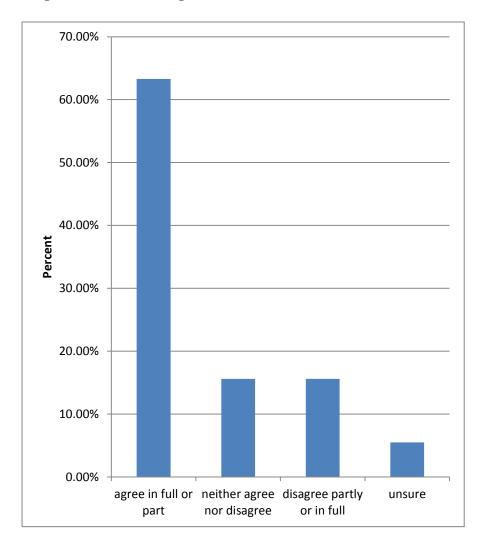
### To what extent do you agree with applying the Sports criteria at Stage 2?



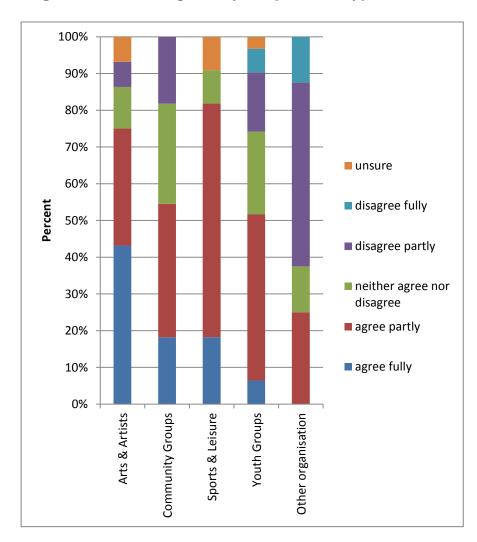
## To what extent do you agree with applying the Sports criteria at Stage 2 – by Type of Respondent



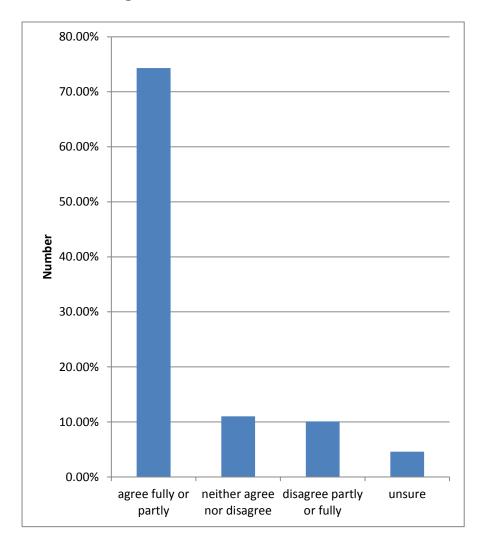
### To what extent do you agree with applying the Arts & Regen criteria at Stage 2?



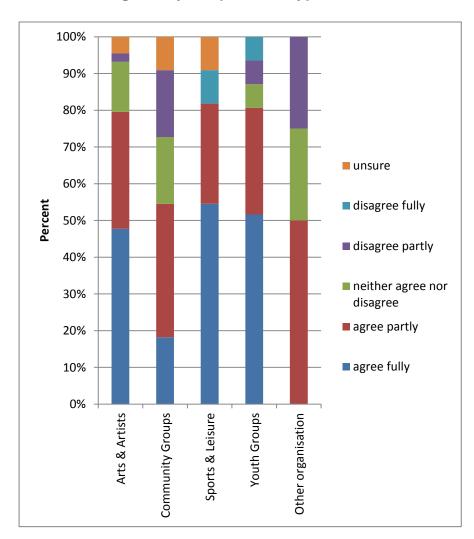
## To what extent do you agree with applying the Arts & Regen criteria at Stage 2 - by Respondent Type



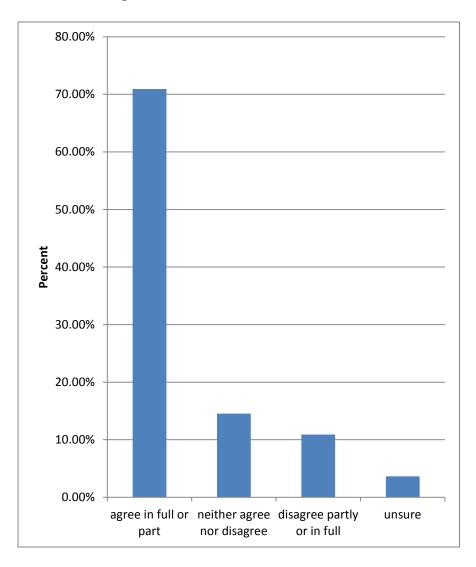
### To what extent do you agree with applying the CYPS criteria at Stage 2?



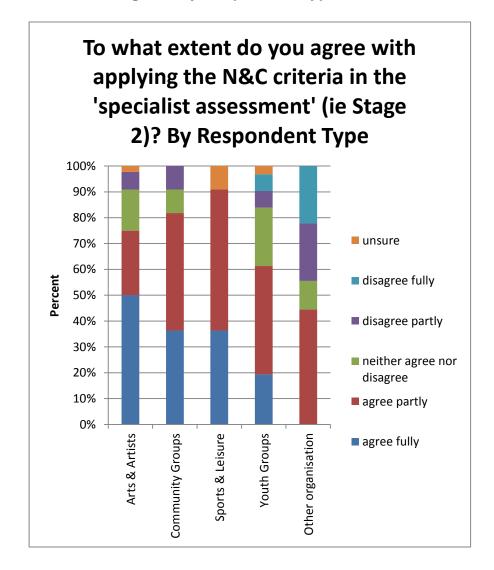
## To what extent do you agree with applying the CYPS criteria at Stage 2 - by Respondent Type



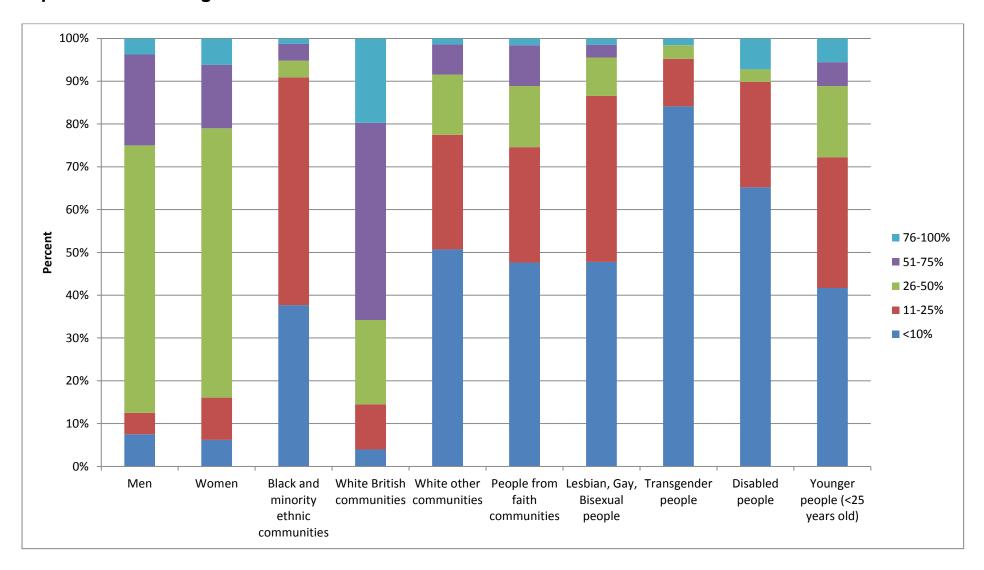
#### To what extent do you agree with applying the N&C criteria at Stage 2?



To what extent do you agree with applying the N&C criteria at Stage 2 – by Respondent Type



#### **Equalities Monitoring**



#### **Responses from:**

#### **About Your Organisation**

Base	107
Which of the following best describes your organisation?	
Arts & Artists	45 42.1%
Community Groups	11 10.3%
Sports & Leisure	11 10.3%
Youth Groups	31 29.0%
Other organisation	9 8.4%

If other please specify:

- Waste Recycler
- Supporting parenting in less advantaged areas
- Therapeutic arts community
- Scout Group
- Community Transport
- Youth Homelessness Organisation
- Scout Group