

Report to:	EXECUTIVE CABINET
Date:	24 August 2022
Executive Member:	Councillor John Taylor - Executive Member Adult Social Care, Homelessness & Inclusivity
Reporting Officer:	Stephanie Butterworth – Director of Adult Services Tracey Harrison – Assistant Director – Adult Social Care
Subject:	PROCUREMENT OF A NEW FRAMEWORK OF CONTRACTORS TO DELIVER ADAPTATIONS AND HOUSING ASSISTANCE
Report Summary:	<p>The Council has duty to deliver mandatory Disabled Facilities Grants using funds provided annually by Central Government. The Council also delivers discretionary adaptations and other grants within the terms of its approved Housing Financial Assistance Policy 2018-2023.</p> <p>This report seeks to gain permission to procure a new Framework of Contractors to deliver adaptations over a 4-year period to disabled people living within the borough via 5 separate Lots with the intention of issuing call off contracts to contractors who have successfully bid to be included in the Framework.</p> <p>The Framework will include:</p> <ul style="list-style-type: none"> Lot 1 for delivery of a range of major adaptations; Lot 2 for delivery of a range of minor adaptations for building works; Lot 3 for delivery of a range of minor adaptations for visual impairment and electrical works; Lot 4 comprising a list of contractors who will bid for works where property extensions or conversion of garages is required; Lot 5 comprising a list of contractors who will bid for works where there disrepair is identified or health and safety issues are present. <p>This report also seeks permission to extend the current Framework contract that expires end of July 2022 to allow time for the procurement process and governance process for the award.</p>
Recommendations:	<p>That Executive Cabinet be recommended to agree:</p> <ul style="list-style-type: none"> (i) to procure a new Framework contract containing 5 Lots via STAR Procurement, to deliver adaptations and other works over a 4-year period covering major and minor building adaptations, together with electrical and other work for visually impaired, property and extension conversions together with maintenance and/or health & safety issues. (ii) to extend the current Framework Contract for 10 months to allow for the procurement process and governance process to be completed.
Corporate Plan:	The procurement of the Framework contract to deliver adaptations across a wide spectrum of the population will allow the Council to show it is taking positive and clear actions within a number of themes in the Corporate Plan:

1 Very Best Start – Promote good parent-infant mental health.

3 Resilient Families & Supportive Networks – Improve the Quality of Social Care practice, Improve the placement ability for our looked after children.

4 Work Skills & Enterprise – Increase number of good quality apprenticeships delivered.

7 Longer & Healthier Lives – Increase physical and mental healthy life expectancy, Improve the wellbeing of our population.

8 Independence & Dignity in Older Life – Increase the number of People helped to live at home, Reduce hospital admissions due to falls, Increase levels of self-care/ social prescribing, Prevention support outside the care system

Policy Implications:

Improving the independence of disabled and vulnerable people within the borough ensure the Council is meeting its requirement under a number of points within the Corporate Plan. The Framework will allow improved and timely delivery of adaptations to assist in the reduction of social care involvement in a number of areas, thereby saving funds across various areas of Adult and Children's Services. In addition, the framework will allow the Council to improve the offer of, and levels of, assistance outlined in its Housing Financial Assistance Policy 2018-2023. This Policy is due for review in 2023.

Financial Implications:

(Authorised by the statutory Section 151 Officer & Chief Finance Officer)

Budget Allocation (if Investment Decision)	Budget £2,800,000
CCG or TMBC Budget Allocation	TMBC
Integrated Commissioning Fund Section – S75, Aligned, In-Collaboration	Section 75
Decision Body – SCB, Executive Cabinet, CCG Governing Body	Executive Cabinet
Value For Money Implications – e.g. Savings Deliverable, Expenditure Avoidance, Benchmark Comparisons	To achieve value for money through the procurement process and generate savings for the council.
Additional Comments There are no specific financial implications within this report, as it is asking for permission to set up a new framework with the support through STAR procurement. The annual allocation for Tameside LA in 22/23 is £2,800,000, which cannot be exceeded.	

Legal Implications:

(Authorised by the Borough Solicitor)

As set out in the main body of the report, the Council has a statutory duty to deliver disabled facilities grant. Part of that role involves providing access to contractors to deliver adaptations and housing assistance. This has been provided for the last 4 years via framework arrangement that is due to expire.

A framework is an expedient route to market as providers are placed on the framework after a competitive exercise. The delivery of each piece of work can then be called off the framework when required using a much shorter procurement exercise than an open procurement. This is especially so as the terms and conditions are set at the inception of the framework and are not varied for each

piece of work.

As set out in the report, the setting up of a new framework has not been achieved to coincide with the expiry. Therefore, a resolution is being sought to extend the current framework for a period of 10 months to enable the new framework to be put in place.

The project officers should ensure that they follow the advice from STAR in retaining the current framework for the additional 10 months to endeavour to mitigate any risk of challenge.

It would also be helpful if by the time this report is considered at Board it includes a time line for the procurement exercise to provide Members with the comfort that the new framework will be in place in 10 months' time.

Risk Management:

1. The Council could choose to allow the contract to expire and do nothing. This is not a viable option because the Council has a statutory duty to deliver mandatory Disabled Facilities Grants. This would create issues with spending the funds allocated by Department of Levelling Up, Housing and Communities and would likely result in an increase in complaints from residents and may lead to investigations by the Local Government Ombudsman for Housing and Social Care
2. The Council could choose not to tender for the works and revert to obtaining individual quotes from a variety of contractors. This is time consuming for the team tasked with delivering adaptations. This option would re-introduce the delays the original framework sought to remove. Similar to 1 above this has risks with expenditure and complaints.
3. The Council could choose to procure the works in such a way that would hand all the works contained within the tender to one contractor. There are no contractors with this capacity within Tameside. In addition, this is a single point of failure. The Framework contract will be designed in such a way to encourage individual suppliers/ builders to take part and help with maintaining social capital within the borough.

Background Information:

Appendix 1	EIA
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The background papers relating to this report can be inspected by contacting Jim Davies, Housing Adaptations Manager



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1 BACKGROUND

- 1.1 Funding for Disabled Facilities Grant (DFG) has been included within the Better Care Fund (BCF) since 2015-2016. It operates under Section 75 of the National Health Service Act 2006 (pooled budget arrangements between Clinical Commissioning Groups and the local council). However, the provision of DFG for those who qualify for the service remains a statutory duty on the local housing authority.
- 1.2 Legislation places a statutory duty on the local housing authority to receive and approve eligible applications where the Council considers the adaption to be “necessary and appropriate” to meet the assessed needs of the disabled person, and “reasonable and practicable” in relation to the age and condition of the property to be adapted.
- 1.3 The Council offers the Housing Adaptations service (an in-house low-level Home Improvement Agency) to assist disabled and vulnerable residents of the borough in making an application for a DFG where a referral is made by an Occupational Therapist from Adult Services and Children’s Services. Government regulation limits maximum individual grants to £30,000 (this is currently under review by government) in England including all on costs and VAT where appropriate.
- 1.4 In order to offer any form of financial assistance a local authority is required to have an approved Policy. The Council introduced its new Housing Financial Assistance Policy 2018-2023 under the terms of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 to make delivery of adaptations easier by reducing bureaucracy and offering a series of new discretionary grants, including grants where no means test is required.
- 1.5 This Policy has been the subject of an interim review to revise the grant limits, approved at Executive Cabinet in March 2022. This change will prevent applicants having to undergo, and potentially failing, the means test due to works costs now exceeding the limits set in the original Policy in 2018.
- 1.6 The Council carried out a procurement exercise in 2018 to obtain suitable contractors to provide adaptations for disabled people living within Tameside. This contract was awarded in July 2018 for 4 years.
- 1.7 In August 2021, Executive Cabinet approved a report to increase the rates paid to contractors within the existing framework contracts following the effects of the Covid-19 pandemic and following Brexit. Material costs have risen dramatically due to lack of supplies both in the UK and from abroad.
- 1.8 In order to continue to deliver adaptations in a timely and efficient manner for a reasonable cost a new contract is required for the next 4 years.
- 1.9 Contractors and Housing Adaptations are still feeling the effects of the pandemic and this has had a detrimental effect on the works and the ability to prepare the new contract for consideration by STAR.
- 1.10 During late 2021, with the assistance of STAR Procurement, attempts were made to engage a number of alternative suppliers operating within Greater Manchester to assist with the continuing delivery of adaptations. These approaches have taken up limited resources within the Service but ultimately have failed. Potential suppliers were themselves experiencing a backlog of works due to the pandemic, and generally unwilling to take on the work offered. In addition, they preferred to not deal with what they considered a small numbers of schemes on offer.
- 1.11 The cumulative effect is that it is now not possible to procure a new contract in time to meet the end of the current framework and therefore an extension will require approval. Details of the Extension request are at Section 8.

2 PROCURMENT STANDING ORDERS/ AUTHORISATION TO PROCEED/ EXTEND

- 2.1 The value of the works is expected to be in the region of £1,500,000 to £1,800,000 per year leading to a potential total of £6,000,000 to £7,200,000 over the term of the framework contract. This amount will be split between those contractors who are successful in their bids and ultimately those who are offered and accept works under the terms of the contract.
- 2.2 The works will fall within value band D contained at clause 5.5 within the Procurement Standing Orders and will require to be advertised on Contracts Finder and be the subject of an OJEU Notice.
- 2.3 The procurement process will be carried out by STAR Procurement under Section 7 of the Procurement Standing Orders. A potential timeline of the procurement process is noted below:
- w/c 12 September 2022 – Market engagement event
 - w/c 17 October 2022 – Commence OJEU Open tender procedure
 - w/c 28 November 2022 – Tender Submission deadline
 - w/c 05 December 2022 – Commence evaluation of tenders and shortlisting
 - w/c 19 December 2022 – Moderation/ interviews
 - January/ February 2023 – prepare award report and submit for Governance
 - February 2023 – Communicate decisions to bidders
 - March 2023 – Alcatel period/ Award

The latter stages of the timeline will be subject to fluctuation due to the potential for issues to arise within the procurement process, a longer evaluation/ moderation process, and the Christmas and New Year holidays. The requested extension to the current Framework contract will cover any potential delays in the process.

- 2.4 For the extension of the current contract, under Section 9.3.6 of the Procurement Standing orders an extension of the existing Contract is requested and the required Modification Form will be submitted to STAR should this request be approved

3 CONTRACT MAKE UP AND VALUE

- 3.1 The new Framework contract will consist of 5 (five) Lots, each delivering a different aspect of work to allow potential bidders to decide which type of work best suits their expertise.
- Lot 1 - major adaptations to bathrooms and adaptations to other internal and external parts of the dwelling.
 - Lot 2 - minor building works where costs are below the threshold for major works and can be delivered reasonably quickly.
 - Lot 3 - minor electrical works including Visual Impairment works where costs are below the threshold for major works and can be delivered reasonably quickly.
 - Lot 4 - a list of contractors suitable for carrying out extensions and garage conversions where the cost exceeds the limit for DFG.
 - Lot 5 - a list of contractors suitable for carrying out works to deal with housing disrepair issues of a health and safety nature for vulnerable households. Other capital grant funds these works.
- 3.2 In Lot 1 the majority of works will be delivered using a fixed price format. The provision of wet floor bathrooms and wet rooms is the majority of referrals. In many cases, adaptations for bathrooms are similar and as such, two versions of a bathroom and two floor types are used to determine a fixed price. Any non-standard items required to vary the fixed price will utilise an itemised priced schedule. This method means that contractors do not have to spend time individually pricing schemes; they only consider nonstandard items highlighted by the Technical Officer. This greatly speeds up the 'pricing' of a scheme. This method has been successful in the current Framework contract.

- 3.3 The estimated annual value of the Framework contract will be between approx. £1,500,000 and £1,800,000 giving a total contract value of between approx. £6,000,000 and £7,200,000 over the 4-year period. The actual expenditure per year, and therefore the term of the Framework, depends on a number of factors.
- The number of referrals received by Housing Adaptations.
 - The capacity of Housing Adaptations to deliver schemes at that time.
 - Co-operation of social housing providers (permissions, contributions).
 - Co-operation of the Service User and/or their family to engage.
 - The complexity of the adaptations required (complex works have risen compared with those prior to the Covid-19 pandemic).
 - The extent of the adaptations, i.e. internal works to a property, extension, garage conversion (requests for extensions have risen compared with the numbers prior to the Covid-19 pandemic).
 - The number of requests for non-adaptation works received (subject to capacity within the service)
- 3.4 This Framework contract does not include the provision of lifting and hoisting equipment. This is currently delivered under a separate joint contract with Oldham MBC (Oldham leads on this contract) with an annual expenditure of approx. £300,000-£400,000.
- 3.5 The anticipated expenditure for this new framework is based upon the number of referrals received and completed prior to the pandemic, which was higher than at present. This also takes into effect the cost of works due to continuing rising costs in the building industry. The total expenditure on adaptations for 2018-2019 was £1,875,000 and in 2019-2020 was £2,178,000.
- 3.6 Currently there is a substantial amount of work waiting for assessment in Adult Services. Together with a large number of referrals at various stages of preparation already within Housing Adaptations, there is more than enough work to equal, and potentially exceed those previous levels of expenditure over the lifetime of the framework contract.
- 3.7 As businesses recover from the Covid-19 pandemic, the building trade continues to experience increases in the cost of materials, fuel, energy and other associated activities. In addition to this, the current cost of living increases and the continuing issues around inflation, due to domestic and international factors outside the control of this authority, will affect the cost of delivering works within the framework during its lifetime. Issues persist in certain areas around technology related items, 'chips', electronics and delivery of materials from within the UK, Europe and beyond.

4 FINANCIAL IMPLICATIONS

- 4.1 Funding for adaptations is from the national Disabled Facilities Grant allocation each year from the Department of Levelling Up, Housing & Communities and Department of Health and Social Care. The national allocation has been steadily rising over the last 6 years and in 2021-2022 was £573,000,000. The annual allocation for Tameside during the last two years was £2,849,000. Government has indicated funding is likely to remain at this level over the next two financial years. The allocation to Tameside for 2022-2023 is again £2,849,000.
- 4.2 As per the grant determination letter for 2022-2023 "DFG is capital funding and can only be used for the provision of adaptations to help older and disabled people to live as independently and safely as possible and by local agreement a portion of the grant may also be used for wider social care capital projects." There is no implication for the Council's capital budget where this grant is concerned.

- 4.3 There is currently no obligation on any local authority to repay any unused grant allocation. However, because the DFG is a mandatory grant legislation states a local authority cannot refuse a valid application for DFG if they have spent all their allocation.
- 4.4 Over the past few years there has been a regular underspend and as such some of this could be made available to underpin any reduction in expenditure during the contract period should government decide to reduce any allocation to Tameside. Currently there is no guarantee on the level of grant funding beyond the agreed period 2023-2024. However as government continues to review guidance and legislation regarding provision of adaptations it is unlikely funding will be withdrawn completely for adaptations.
- 4.5 In addition to delivery of adaptations, there is also the inclusion in the Framework contract of discretionary non-adaptation works for vulnerable homeowners. Such works will assist in preventing continuing disrepair to a property with the potential for the occupiers to develop health related issues. The ultimate intention is to reduce, where possible, or delay the need for future intervention from Adult Social Care. This grant forms part of the approved Financial Assistance Policy 2018-2023 and funding for this work is from repaid housing capital grant collected over a number of years. This budget is separate from that for adaptations and does not have implications for other Council capital funds.

5 ALTERNATIVE OPTIONS

- 5.1 The Council has a number of alternative options to procuring a new Framework contract at this time regarding delivery of adaptations.
- 5.2 Option 1. Do nothing and allow the tender to expire. The Council could choose to only fulfil its' mandatory duty to deliver adaptations by the provision of the minimum service allowing individuals to make their own applications. This would render the Housing Adaptations Service unnecessary and mean redeployment of most of the staff. This is a drastic option and Tameside does not favour this option.
- 5.3 Option 2. Allow the tender to expire and do not re-tender but continue to deliver adaptations using Housing Adaptations Service. This would mean each scheme, no matter how small, would require individual procurement taking up substantial staff resources in order to make this work. Each scheme would require a specification and, a separate drawing. Each scheme would require two or three quotes for consideration. In this option, individuals can still make their own applications, as is their right. Tameside does not favour this option.
- 5.4 Option 3. The Council could decide to procure the provision of works in such a way that one main contractor is responsible for delivery of the entire or majority of the program of works. Tameside does not favour this option. An alternative on this approach would be to join an existing contract delivering works through one contractor. Again, in this option individuals can still make their own application. Tameside does not favour this option.

6 RISKS

- 6.1 Option 1. If the Council takes the decision to allow the current contract to expire and revert to its' mandatory duty only and not assist applicants, it could revert to a passive process. This would mean only reacting to enquiries and posting out the application forms for disabled people or their family to obtain their own prices and then make their own applications. If approved they would then be responsible for overseeing the works. The legislation would become the main operating factor and would require a complete review of the RRO Policy. In this scenario, the Council would only receive and process applications. It would only be required to consult with Adult and Children's Services on applications to determine the adaptations meet the requirements of 'necessary & appropriate'. The Council would determine (approve or not

approve) applications and it would make payments direct to the applicant or their contractor following an inspection, upon completion of the scheme.

- 6.2 This option is fraught with problems due to the very nature of the people requiring adaptations. Many people are not capable of making their own applications due to their disability. Unscrupulous builders may take advantage of vulnerable people, demanding upfront payments, poor workmanship, poor quality items, etc. The Council would not be able to exercise control over quality or the builder used and where quality is an issue it could refuse to pay out the grant. This would effectively put the client in dispute with their builder. Legislation requires grant payment upon completion of the works, although staged payments are possible this doesn't work for the majority of works, and many people are not in a financial position to cover these up-front costs. In order to make payment each individual has to be set up in Agresso, and this can be problematical when trying to obtain bank details. Many people would simply not apply for adaptations and would take the easy option to continue to rely on the Council to provide care through Adult and Children's Services. This option would mean a reduction in the staff required to deliver the service. Such an option would likely not achieve the number of completions currently experienced and would have a negative effect on expenditure.
- 6.3 Option 2. If a scheme-by-scheme procurement arrangement is followed, this would revert the Service back to the position it was in prior to the increase in allocations in 2015-2016. STAR Procurement would have to approve each contractor/price and may involve setting up of multiple small suppliers in Agresso. The current Framework contract arrangement was developed to avoid the issues raised with individual pricing arrangements and the negative effect this has on staff resources. The original increase in allocation of funding to just over £2,000,000 in 2015-2016 was a driver to change the delivery mechanism along with the adoption of the Housing Financial Assistance Policy 2018-2023 to remove some of the bureaucracy in place at the time. It would be completely impractical to return to this process taking into account the number of referrals and current budget levels.
- 6.4 There is currently a large backlog of people waiting for assessment within Adult and Children's Services. Together with the increasing number of complex cases including an increase in the number of extensions / conversions being referred, it is important to have contractors who are ready to take on work and who have already been through the procurement and vetting process. A scheme-by-scheme procurement process is time consuming. It would have a negative effect on the ability of the Service to deal with the number of referrals coming through and would create a further backlog. It would have a profound negative effect on expenditure due to the process employed.
- 6.5 Option 3. The procurement of a single delivery contractor or joining an existing arrangement would result in all the works delivered via a management contractor. There are no contractors based in Tameside large enough to deliver this type of arrangement. This option would most likely involve a contractor from within or potentially from beyond the GM region. Management contractors sometimes employ their own staff bypassing local contractors. This would affect local employment, local suppliers to the local contractors and spend within the borough because large contractors rarely buy locally. The effect on social capital would be profound.
- 6.6 Another aspect of management contractors is the use of independent sub-contractors who may not be from the area to deliver the works, although some may be persuaded to employ locally. In many cases, these subcontractors carry out the works for less than the contracted price in order for the main contractor to continue to make a profit. This arrangement can lead to subcontractors cutting corners to minimise their time on site and/or paying lower wages. This arrangement requires intensive management of the contract and distracts staff from delivering works, etc. In the previous Framework contract, two management contractors were asked to withdraw from the contract due to the number of complaints received concerning staff issues and the quality of work delivered by subcontractors.

- 6.7 If the existing current framework contract is not extended delivery will revert to the need to procure each scheme on an individual basis until a new framework was awarded. The effect would be the same as noted in 6.3 above. The main risk in not providing a delivery mechanism is that the Council could breach its duty to deliver mandatory grant. Not having a suitable delivery mechanism will increase delivery times putting more pressure on social care services.

7 PREFERRED OPTION FOR PROCUREMENT

- 7.1 The preferred procurement option is for a Framework split into a number of areas of work that covers a number of elements: local builders, local employment, local spend, social capital, less need to travel long distances, local material suppliers where possible, and the knowledge that the builder is doing something good for the community. Prior to commencing the procurement exercise local smaller contractors will be contacted and encouraged to bid for inclusion in the framework.
- 7.2 Successful bidders in Lot 1 (cost over £1,500 but less than £30,000) in the framework will be offered work on a regular rota basis and will have the option to accept or decline the work offered based upon an agreed process. Should they decline; the offer is made to the next contractor, and so on down the list. In particular, in Lot 1 using the Fixed Price Schemes and because bathroom schemes form the majority of work, the time spent obtaining prices is reduced and by having a number of available builders available, the works can start sooner.
- 7.3 Successful bidders in Lot 2 and Lot 3 (cost up to £1,500) in the framework will be offered work on a regular rota basis and will have the option to accept or decline the work offered based upon an agreed process. Should they decline; the offer is made to the next contractor, and so on down the list. Due the cost limit and no grant process for these works it means that they can offer quick and easy solutions to those people not requiring a major adaptation.
- 7.4 Successful bidders in Lot 4 will form a list of contractors chosen for their suitability to carry out works where the referral is for an extension or garage conversion in order to meet the assessed needs of the disabled person where the property does not lend itself to that persons needs. Those interested in the work at the relevant time will enter into a mini competition to provide prices for the works, with the lowest price being successful. Because contractors have already been successful in gaining access to the list, the award and delivery of works should be timely.
- 7.5 Successful bidders in Lot 5 will form a varied list of contractors who have indicated their interest in works relating to disrepair. A mini competition between those interested at the time will determine a suitable contractor to carry out the work in a similar manner to those in Lot 4.
- 7.6 This preferred procurement option gives the Council more flexibility and control in the provision of adaptations, and home repair assistance, to its residents, will provide decent response time, supports social capital, employment and investment in the borough. The delivery of works will not be under one single supplier and will reduce the possible single point of failure.
- 7.7 This preferred option still maintains the ability of those individuals who wish to make their own application to do so. This is their right under the terms of the legislation. Currently around 12 applications a year are approved through personal applications where the applicant chooses not to wait for an assessment of need, or is considering additional works to their property and the adaptations are being incorporated into those works. Where possible the contractors on the framework could price for works submitted as personal applications. In such circumstances, having a number of builders who understand adaptations can be of benefit to those making personal applications for grant assistance. However, their commitment to the framework is a contractual obligation.

8 MARKET ENGAGEMENT

- 8.1 The Council wishes to promote and increase opportunities for businesses within Tameside. This increases expenditure within the borough, helps to maintain employment, supports social capital and gives contractors a sense of helping their local community. It is possible a number of local suppliers will bid for inclusion on the new framework.
- 8.2 In order to ensure the Framework contract and the works contained within are available to as wide a section of local contractors as possible the Council is planning to hold a market engagement event to offer local suppliers the opportunity to meet the commissioners and ask questions about the framework and the procurement process. The previous tender process highlighted that the majority of contractors who are likely to be interested in this opportunity are from small or medium sized enterprises and the likelihood is that some may not be registered on the CHEST (North West Procurement Portal). It is therefore our intention to support these contractors to register on the CHEST portal prior to this event in preparation for the procurement process. STAR Procurement will be involved in providing this support.

9 EXTENSION OF EXISTING FRAMEWORK CONTRACT

- 9.1 The existing contract expires at the end of July 2022. It is proposed the current Framework contract is extended for a period up to 10 months or until the new Framework contract is awarded, whichever is the soonest. This will provide enough time to hold the market engagement event, prepare for the procurement process, carry out the evaluation process and complete governance for the award process.

10 EQUALITY IMPACT ASSESSMENT (EIA)

- 10.1 An Equality Impact Assessment (EIA) Part 1–Initial Screening is complete. The EIA is attached to this report at **Appendix 1**.
- 10.2 It is considered appropriate that a full EIA is not required for this procurement exercise. The procurement exercise is a mechanism for delivering the outcomes of the Housing Financial Assistance Policy 2018-2023, and it is this Policy that was considered under the previous EIA. When the Policy is reviewed a new EIA will be carried out.
- 10.3 The groups within the EIA have been previously considered and the impact on them assessed. These groups will have benefited from the Policy by an award of grant assistance when necessary and their protected rights have been considered, and will continue to be considered throughout the application process.

11 RECOMMENDATIONS

- 11.1 That the recommendations at the front of this report be approved.