

<b>Report to:</b>	<b>EXECUTIVE CABINET</b>
<b>Date:</b>	27 March 2019
<b>Executive Member/Reporting Officer:</b>	Councillor Brenda Warrington – Executive Leader Jayne Traverse – Director of Growth
<b>Subject:</b>	<b>HOUSING FINANCIAL ASSISTANCE POLICY 2018 – 2023</b>
<b>Report Summary:</b>	<p>Tameside's current Private Sector Housing Renewal Policy was approved in 2003.</p> <p>With increased Government Disabled Facilities Grant funding and continued repayments from previous housing improvement grants and loans, the report provides an updated Private Sector Housing Renewal Policy to enable a more holistic approach to Housing Adaptation improvements.</p>
<b>Recommendations:</b>	Members are asked to APPROVE the proposed amendments to the Policy set out in the report in connection with the Disabled Facilities Grant and other associated funding loans and grants, including a further three additional grants following the consultation process undertaken between 12 December 2018 and 25 January 2019.
<b>Links to Community Strategy:</b>	Supportive Tameside: Help people live independently
<b>Policy Implications:</b>	An updated Financial Assistance Policy underpins a number of Tameside and wider regional policies in providing quality care in the home for those that need it
<b>Financial Implications:</b> <b>(authorised by Section 151 Officer)</b>	<p>The 2018-19 Disabled Facilities Grant allocation is £2.37m and the 2018-19 commitments are in line with the allocation. Set out in section 3.8, in points one to five, are the services funded by the grant. There is no payback for this funding. The services set out in section 3.8, points six to eight, are the services to be funded by repayable Housing capital funding. As at 1 April 2018 there is a £0.372m reserve built up by the recycling of payback Housing capital funding over previous years. These services will be monitored separately from the Disabled Facilities Grant funded schemes. The ongoing funding of these schemes will be closely monitored because the timing of the repayments is unknown. The Boiler Replacement scheme set out in section 3.8, sub para 9, will be subject to available grant or other funding.</p> <p>An additional £0.500m has been earmarked for this new financial assistance policy which was approved by Executive Cabinet on 13 February 2019.</p>
<b>Legal Implications:</b> <b>(authorised by Borough Solicitor)</b>	The Council has statutory duties to provide Disabled Facilities Grants and various powers to provide financial assistance for the purpose of improving living conditions in its area. Failure to implement the grant scheme appropriately would leave the council at risk of legal challenge and could potentially lead to breaches of the Human Rights Act 1998. The current policy was approved in 2003 and so it is timely, given legislative changes, to

carry out a policy review, to ensure the Council remains compliant and that the scheme is meeting its objectives.

The Council is looking at removal of some of the bureaucracy involved with applying the scheme and to this end is adopting a wider discretionary policy to allow for flexibility. There is always a risk to the Council that the implementation of any policy may give rise to legal challenge, and so as with all Council policies it should be kept under review.

An EIA was completed before consultation, and has now been reviewed and refreshed for Members to ultimately consider and understand prior to approval of the final policy.

The Test of Resources (ToR), or means test, used to determine whether an applicant is eligible for grant assistance is a requirement of Section 30 of the Housing Grants, Construction and Regeneration Act 1996 and the Housing Renewal Grant Regulations 1996 as amended. When the Regulatory Reform Act 2003 removed references to mandatory means tested grants for various forms of private sector renovation Circular 05/03 stated, amongst other comments “... *Mandatory disabled facilities grants, paid under the legislation, are still directly subject to the provisions of the 1996 Act and Regulations*”.

Although the ToR is closely based upon the Benefits ToR there is no provision for a right of appeal in the regulations, and so it is all the more important to ensure the policy is clear for all applicants to understand, and properly implemented to avoid any successful legal judicial review challenge or complaint to the Local Government Ombudsman.

**Risk Management :**

Outlined in section 5 of the report.

**Access to Information :**

**Appendix 1** – Updated & Revised Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy 2018 -2023

**Appendix 2** – Updated Equality Impact Assessment

**Appendix 3** – Consultation Information

The background papers relating to this report can be inspected by contacting Nigel Gilmore, Head of Strategic Infrastructure.



Telephone: 0161 342 3920



e-mail: [nigel.gilmore@tameside.gov.uk](mailto:nigel.gilmore@tameside.gov.uk)

## **1.0 INTRODUCTION AND NATIONAL POLICY**

- 1.1 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 ) gives local authorities a general power to introduce policies for Private Sector Housing, to provide assistance to individuals with renewals, repairs and adaptations in their homes through grants or loans.
- 1.2 The aim of such general powers is to allow a local authority to fund essential home repairs to reduce injury and accidents, to ensure homes are adequately heated, to expand the scope of adaptations available under the Disabled Facilities Grant legislation, and allow people to relocate to alternative accommodation if their current home is not able to meet their needs. Assistance can be given directly to the individual or through a third party such as a local authority or other partner.
- 1.3 In 2008, Government made a number of changes to the way Disabled Facilities Grant was administered and used. These changes included the relaxation and removal of the ring-fence element in 2010, allowing Disabled Facilities Grant monies to be used more flexibly and as part of wider strategic projects, to keep people safe and well at home and to reduce bureaucracy in the grant's administration.
- 1.4 In reducing bureaucracy, local authorities are able to use the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 to create assistance schemes, which help people meet their needs without undergoing a full Disabled Facilities Grant process.
- 1.5 In order to take full advantage of the relaxed Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy, a local authority must comply with a number of conditions:
  - There must be a formally adopted policy in place, which sets out how the authority intends to use its powers;
  - Any policies must be readily available to the public.
- 1.6 The main provisions applied to any assistance delivered instead of a full Disabled Facilities Grant, are:
  - Home owners are owner occupiers;
  - That a full Disabled Facilities Grant is still available to the individual should it be requested;
  - Each case must be considered on its own merits and a clear mechanism for applying discretion is made available in all circumstances; and
  - That any scheme must meet identified need.
- 1.7 Assistance can be given as:
  - A grant - a sum of money for a specific purpose, with few or no conditions attached and no repayment required;
  - A repayment loan – interest bearing or 0% repaid in instalments over a period of time;
  - A charge on the property – interest bearing or 0% to be repaid on the sale, transfer or disposal of the property; and
  - A combination of these.

## **2.0 TAMESIDE MBC REGULATORY REFORM ORDER**

- 2.1 Tameside's current Private Sector Housing Renewal Policy was approved in 2003 and, subject to minor updates has remained generally unaltered. The original policy can be found at <https://www.tameside.gov.uk/housing/renewalpolicy>. The minor updates consist of:

- A 2011 Key Decision, addressing issues to improve delivery of adaptations outside the Disabled Facilities Grant process; and
- A 2013 Key Decision, changed the delivery of adaptations to meet the reduced level of funding; and
- A 2016 report to Single Commissioning Board, to enable the delivery of housing adaptations through the relaxation of a number of criteria.

2.2 In updating the current Tameside Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy, it is intended to:

- Incorporate changes in Government policy in respect of Disabled Facilities Grant and its increased flexibility;
- To reflect the continued increase in Government funding within the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy;
- Approve the use of ongoing loan repayments to fund alternative initiatives within this updated policy;
- Subject to available funding, increase the number of potential assistance initiatives; and
- Subject to available funding Include Energy Efficiency Measures/ Boiler Replacement Scheme within the updated policy

2.3 At the same time, whilst the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 repealed much regulation around repairs and renewals for local authorities, and considerably increased its flexibilities in meeting residents' needs, it did cite the continued requirement for a statutory Disabled Facilities Grant .

2.4 There is a general recognition, however, that any amount of Disabled Facilities Grant funding is unlikely to meet all eventualities. It is important, therefore, that any policy clearly sets out the limitations of any help available.

2.5 In recognition of the above Tameside has developed a number of additional assistance schemes to address the above.

### **3.0 SUMMARY OF THE NEW HOUSING FINANCIAL ASSISTANCE POLICY 2018 – 2023**

3.1 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 provides local authorities with the ability to design their own financial assistance policies to suit their specific requirements and priorities. In this respect the revised policy provides the means to allow vulnerable and disabled residents access to existing forms of financial assistance which will assist them in maintaining independence, preventing further deterioration in their condition and reducing the need to call upon social care and health services.

3.2 In addition and as part of the revised policy, the Council intends to introduce new forms of assistance to enable the offer to be increased to elderly and the vulnerable home-owner, assisting those individuals who may not qualify for a Disabled Facilities Grant adaptation but who may need other assistance to prevent or defer the need for further and more expensive interventions at a later date.

3.3 With the exception of mandatory Disabled Facilities Grant, help provided through the Policy will generally be available on a single occasion only. The Council will endeavour to advise people on how to maintain their homes and will expect them to do so following any help given without resorting to further financial assistance.

3.4 Proposed assistance is offered in a number of ways and subject to financial considerations as summarised in **Appendix 4**. Dependant on circumstance, individual instances can attract funding of varying amounts and are in many cases subject to a "test of resource" and for home owners, a local land charge.

- 3.5 In summary eleven alternative types of financial assistance are proposed.
- 3.6 The funding for assistance noted in sections 1 to 7 below will be provided utilising the annual allocation from government. There is no requirement to pay back this funding.
- 3.7 Funding for assistance noted in sections 8 to 10 below will be provided from repaid Housing Capital. This source of funding is from two historic assistance initiatives: Anchor Staying Put Scheme and West Pennine Equity Loan Scheme where the investment is secured by means of a charge. Disposal or transfer of ownership triggers the condition that requires repayment of the investment.
- 3.8 Section 11, Boiler Replacement Scheme, will be subject to external grant funding when made available through Government or elsewhere
1. **Mandatory Disabled Facilities Grant:** To provide assistance utilising the mandatory Disabled Facilities Grant to those people who qualify to make applications under existing legislation. The rules for circumstances where repayment of mandatory Disabled Facilities Grant may apply are applicable.
  2. **Proportionate Mandatory Disabled Facilities Grant:** To provide financial assistance to a homeowner who wishes to carry out works to undertake adaptations over and above those as assessed as being necessary and appropriate by an Occupational Therapist. The rules for circumstances where repayment of mandatory Disabled Facilities Grant may apply are applicable.
  3. **Grant for Adaptations (Discretionary Assistance):** As part of this Policy the Council will exempt any application for financial assistance to undergo the test of resources (means test) for Disabled Facilities Grant where the amount is under £5,000.
  4. **Provision of Equipment (straight & curved stairlifts, ceiling track hoists and WC's with a douche facility (Discretionary Assistance):** As part of this Policy the Council will provide financial assistance where there is a clear need to install certain equipment without the need for associated building works and where there is a risk of falls and/or a potential to reduce care costs. There will be no requirement to make a formal application or to undergo the test of resources following a recommendation from an Occupational Therapist.
  5. **Payments towards Adaptations (Discretionary Assistance):** Such a grant may include:
    - a. **Unforeseen Works Assistance:** For circumstances where the maximum grant has been awarded and unforeseen works occur
    - b. **Shortfall Assistance:** For circumstances where the cost of providing the adaptations as recommended by the OT exceeds the maximum Disabled Facilities Grant grant
    - c. **Contribution Assistance:** In circumstances where the disabled person or applicant cannot meet the contribution indicated towards the costs of the works, which has been determined by the statutory test of resources
    - d. **Relocation Assistance for Home Owners:** Relocation assistance applies in circumstances where the disabled person needs to move from their existing residence as a result of being unable to adapt the property
    - e. **Relocation Assistance for Tenants of Social and Private Landlords:** This assistance will cover typical removal costs and will apply to tenants in circumstances where it is deemed more appropriate for the client to move to a more suitable property or where adaptations are refused due to under-occupancy.
  6. **Hospital Discharge Grants:** Other areas of funding may include Discretionary Hospital Discharge Grants to prevent delayed discharge through assistance aimed at carrying

out works up to £5,000 to render a property habitable and safe for the patient to be discharged to. This grant is not repayable by the applicant.

7. **Dementia Assistance Grant (Discretionary Assistance):** This assistance will be available to any person affected by Dementia as determined by a specialist health professional. Depending upon circumstances funding may be provided to introduce changes to a property allowing the applicant to live there safely and for longer. The maximum assistance will be £2,000 and any application will not be required to undergo the test of resources (means test).
8. **“Stay Put” Scheme:** The provision of a “Stay Put” scheme for home-owners over 65 subject to certain qualifying conditions to provide assistance up to £6,000 for repair works of an essential nature that will prevent further deterioration of the property and help maintain independent living. There will be a local land charge for this funding at 0% interest.
9. **Home Repair Assistance:** Introduction of “Home Repair Assistance” for vulnerable home-owners under the age of 65 subject to certain qualifying conditions to provide assistance up to £6,000 to remove Health & Safety issues and carry out works of an essential nature that will prevent further deterioration of the property. There will be a local land charge for this funding at 0% interest.
10. **Safety Net Assistance:** In circumstances where the owner occupier does not qualify for either the Stay Put scheme or the Home Repair Scheme and where an extreme risk to the health and safety of the occupier or other members of the public exists due to the condition of the property the Council may provide financial assistance up to £6,000. There will be a local land charge for this funding at 0% interest.
11. **Boiler Replacement Scheme:** Whilst previously offered through the council, the Boiler Replacement Scheme inclusion provides for a more proactive intervention by the authority and will be subject to available grant or other funding. Assistance will only be available where a heating system or boiler is considered by the Council or a qualified Gas Safe engineer to be in need of repair, replacement, or condemned.

#### 4.0 FINANCIAL IMPLICATIONS

- 4.1 Over the five year period (2015/16 to 2019/20) Government indicated a substantial increase in overall Disabled Facilities Grant related funding. Whilst these figures have been generally borne out in practice, for individual years they are only confirmed well into each financial year providing continued uncertainty in long term planning. Over the period in question Tameside’s allocations have risen from £1.2m in 2015/16 to £2.327m during 2018/19.
- 4.2 A number of initiatives in this new policy will be funded from on-going capital and loan repayments associated with previous loan policy; in effect recycling the funds.
- 4.3 Previous schemes to assist residents to improve their homes included a charge on individual properties as part of the original 2003 Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy. Some of these charges are resulting in repayments of this assistance.
- 4.4 One scheme, Anchor Staying Put Scheme operated by Anchor Housing Home Improvement Agency on behalf of the Council, used housing capital to offer financial assistance to home owners over 60 years of age to carry out essential repairs to their properties. The assistance was secured by a land charge repayable upon disposal or transfer of ownership. The scheme came to an end in 2012.
- 4.5 The second scheme, an Equity Loan Scheme operated by West Pennine Housing Association (now Regenda) used Housing Capital provided by the Council, permitted home

- owners to carry out major repairs to their properties. The funds invested were secured by a charge at HM Land Registry and were repaid upon disposal or transfer of ownership.
- 4.6 The new Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy, in addition to assisting more people with disabilities, will help improve the overall condition of housing stock within the borough and will greatly assist with the Council's stated aim of supporting more of its residents to live independently and reduce the need for those same residents to call upon other and more expensive related services.
- 4.7 The overall capital expenditure in the provision of such initiatives, within the amended Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy, will not impact upon the current provision and will be contained within existing budgets.
- 4.8 Where new initiatives demand charges to be placed on a property, the repayment of this capital will be recycled to fund other schemes within this policy.
- 4.9 Whilst mandatory Disabled Facilities Grant requirements are statutory, all initiatives outside the Disabled Facilities Grant will be subject to the availability of relevant funding meeting relevant criteria.

## **5.0 RISK MANAGEMENT**

- 5.1 Making arrangements to meet assessed needs for people who fall within the requirements of the Care Act 2014 and dealing with applications for Disabled Facilities Grant's are statutory duties. Failure to make sufficient resource available creates a risk of external 3<sup>rd</sup> party intervention as well as reputational damage. Whilst the Local Government Ombudsman, in criticising long delays in delivering adaptations, has recognised that Councils have to work within their budgets and has looked favourably on appropriate priority systems, the Courts have always referred to the mandatory nature of the Disabled Facilities Grant and not considered the absence of funding as an excuse for long delays.
- 5.2 The failure to provide a sufficiently resourced service for the provision of adaptations is likely to lead to long term increased costs in the provision of care packages to the health and other sectors of the community as the independence of individuals is compromised. The provision of a full Disabled Facilities Grant with the proposed new initiatives will reduce such impacts.
- 5.3 Funding for initiatives that are deemed to be non-statutory will be subject to available resources. Raising expectations will lead to complaints and criticism and require careful management as the initiatives are publicised.
- 5.4 Future Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy reviews will be undertaken on a five year cycle unless legislation or other circumstances require additional intervention.
- 5.5 Table 1 below highlights the main risk elements of the proposed Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy.

**Table 1: Main Risk Elements of The Proposed Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy**

<b>Risk</b>	<b>Impact</b>	<b>Mitigation</b>
Failure to provide statutory Disabled Facilities Grant adaptations	Greater call by residents on alternative and more expensive interventions by health service and other	Ensure list of interventions is prioritised to ensure most urgent cases are

	partners. Reputational – Potential intervention by Local Government Ombudsman	funded.
Insufficient funding to provide appropriate interventions outside statutory Disabled Facilities Grant funding	Greater call by residents on alternative and more expensive interventions by health service and other partners	Ensure prioritised interventions by local authority provider
Existing loans not repaid to Authority	Reduced future funding for Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 policy	Ensure surety of repayment by land charge or other accepted legally binding interventions
Disputed funding award claim by applicants	Reputational. Potential intervention by Local Government Ombudsman	Ensure clear funding strategies are made available to wider public

## 6.0 EQUALITY IMPACT ASSESSMENT

- 6.1 An Equality Impact Assessment is attached to this report (**Appendix 5**) and includes details from the consultation process. It has been drafted to address the impacts of this policy change and will continue to operate alongside the implementation of the revised policy for the purpose of continuous monitoring.
- 6.2 The implementation of the proposed changes will positively aid disabled people who do not meet the requirements of Disabled Facilities Grant criteria and are not able to financially support further adaptation.
- 6.3 This EIA has been undertaken to explore how the impact of the proposed changes to adaptations funded by the Disabled Facilities Grant and other resources is provided in the future. The changes are driven by:
- Increasing demand exceeding current capacity in terms of both funding and resources to meet this demand.
  - Fluctuating Disabled Facilities Grant budget position over a number of years
  - Ongoing relaxation of Disabled Facilities Grant criteria in delivering services
  - Managing expectations of any proposed policy reviews
- 6.4 These actions will positively impact upon individuals who are:
- Disabled and living within the community
  - Unable to afford or fail to meet statutory requirements for a Disabled Facilities Grant .
  - Unable to move to more suitable accommodation due to financial restrictions
  - Unable to afford the cost of essential property repairs that are likely to have an impact on their health and wellbeing
  - Currently unable to move from a hospital environment into suitable residential accommodation without assistance to render a property habitable and safe for the patient to live in.
  - Potentially delayed by hospital discharge with increased cost to the NHS due to the inability to provide adaptations and facilitates in less formal care in the home environment
  - Suffering from Dementia related issues



- 6.5 To manage the changes within the policy, the authority will:
- Continue to offer reassessment should a person's needs change in the future
  - Continue to provide advice to individuals and signpost them where appropriate to alternative options
  - Ensure the impact of the proposals is kept under regular review, both generally and specifically, in individual cases.
- 6.6 The Council is not making any changes to the mandatory Disabled Facilities Grant, the ability of a disabled person to benefit from assistance or to purchase a more suitable home where the current home cannot be adapted or the safety net assistance to remove health and safety risks from the home.

## 7.0 CONSULTATION

- 7.1 In order to seek wider support for the proposed Housing Financial Assistance Policy update a public consultation exercise was undertaken between 12 December 2018 and 25 January 2019.
- 7.2 The process took the form of an online survey for individual responses via the Big Conversation where consultees were asked 8 separate questions and 1 for general comment.
- 7.3 A number of targeted emails were sent to health and age related bodies and housing providers with stock in the borough and requested their comments on the proposals.<sup>1</sup>
- 7.3 At the closing date for the consultation period 18 individuals had participated in the survey via the Big Conversation and 1 response had been received from the targeted email survey.
- 7.4 Outcomes from the Big Conversation are noted at **Appendix 6** below. In brief:
- 18 participants took part in the on-line survey. The overriding outcome is a majority (87%) agreed with the forms of assistance in the new Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy.
  - In response to the questions asked the highest response received was 100% in favour of introducing the Hospital Discharge Grant, the Stay Put Scheme and the Home Repair Assistance whilst the lowest response was 82.3% in favour placing a charge on a proportionate grant.
- 7.5 Question 9 of the online survey asked participants for additional comments. Those comments and our response is noted in Table 2

**Table 2: Additional Comments from Participants**

	Comment from Participant	Response from Authority
1	<i>Need to ensure budget is ear-marked</i>	This will be carried out as part of the scheme

<sup>1</sup> The list of consultees comprised: Age UK, Foundations, Infinity (NHS), Irwell Valley Housing Association, Jigsaw Homes (NCH), Onward Homes, Pennine Mencap, People First Tameside, Regenda Homes, Stroke Association, Tameside Sight, Tameside Welfare Rights, and Tameside & Glossop Mind, including those residents / public signed up to Big Conversation (around 130 people) and to the Council's Partnership Engagement Network (around 300 contacts which includes not only members of the public but also partner organisations and voluntary & community sector partners who then share this information widely with their own contacts).

	<i>for this and obviously monitor progress</i>	management and budget monitoring process
2	<i>Sometimes it's not people's fault they fall on hard times &amp; it's a good idea especially for homeowners to get assistance with home improvements / adaptations to their homes as it is their home at the end of the day &amp; would probably cost less in rehousing a vulnerable adult</i>	This is understood completely and part of the reason for introducing some of the new initiatives
3	<i>None received</i>	None
4	<i>Could the same breadth of consideration be given to social care payments? I believe direct payments from Tameside only match pound for pound unlike Derbyshire where full payments are made from the Council</i>	Whilst the comment doesn't have any direct relevance it is noted and it will be passed onto Adult Services.
5	<i>Having benefited under the grant I would like to ensure that the end user is actually consulted as to if the work has been satisfactory completed as I know mine wasn't. It still grates even today that the shower doesn't work properly</i>	In this instance it is not possible to determine the issues raised by the responder.
6	<i>I only agree with question 8, if a charge is placed on the owner occupier property for reclaim by the authority</i>	Charges will be applied where an owner receives assistance and will be recovered in the appropriate circumstance.

- 7.6 Of the targeted emails a single response was received from Foundations a sponsored Ministry of Housing, Communities and Local Government body set in place to support Home Improvement Agencies.
- 7.7 Foundations suggested that the Council considers including some of the recommendations made in the recently published report into the review of the Disabled Facilities Grant to widen the scope of some of our assistance initiatives.
- 7.8 In considering these recommendations a number have now been included into the new Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy.
- Provision of stairlifts, ceiling track hoists and specialist toilets where there is potential to reduce falls and reduce care input;
  - Assistance for tenants in rented accommodation to facilitate a house move o more suitable accommodation where this may result in few adaptations;
  - Provision of aids and assistance for people suffering with dementia related issues.
- 7.9 Overall the response to the consultation process has been limited. This should not be seen in a negative light however as the subject of the consultation, an improved Housing Financial Assistance Policy, will benefit all users of the various grants available.

- 7.10 In contrast consultations carried out where there is a potential detrimental consequence to services or to the public often provoke a larger volume response.
- 7.11 The outcome from the consultation, therefore, should be considered positive and as a result the new Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 Policy 2018 – 2013 be accepted with the inclusion of the additional initiatives.

## **8 RECOMMENDATIONS**

- 8.1 The recommendations are set out at the front of the report.