

**Report to:** **STRATEGIC PLANNING AND CAPITAL MONITORING PANEL**

**Date:** 14 December 2020

**Reporting Officer:** Councillor Eleanor Wills – Executive Member (Adult Social Care and Health)  
Stephanie Butterworth – Director of Adult Services

**Subject:** **ADULTS CAPITAL PLAN**

**Report Summary:** This report provides an update of the developments in relation to the Adults Capital Programme. The progress against approved projects contained within this report are:

- Review of Daytime Offer
- Christ Church Community Developments (CCCD) - 4C Community Centre in Ashton
- Disabled Facilities Grant (DFG) funded projects:
  - Moving with Dignity (Single Handed Care)
  - Disability Assessment Centre
  - Brain in Hand

This report also seeks to request a further DFG amount of £50k for the Mount Street supported accommodation scheme to take the total amount of DFG capital investment allocation to £100k.

Furthermore, an update is provided on the usage of the wider Disabled Facilities Grant, with a request for the capitalisation of salaries and running costs for the Housing Adaptations Service.

**Recommendations:** That the Strategic Planning and Capital Monitoring Panel be recommended to

- (i) note the updates provided in this report.
- (ii) recommend to Executive Cabinet that Statutory Compliance expenditure of £100,000 (in total) be allocated from the Disabled Facilities Grant budget to support the adaptations required at the Mount Street, Hyde supported living scheme.
- (iii) recommend to Executive Cabinet that the methodology by which the Housing Adaptations Service is resourced from the current fee based structure to one of direct capitalisation of salaries directly from the Disabled Facilities Grant

**Corporate Plan:** The proposals contained within this report support the delivery of the Corporate Plan.

**Policy Implications:** In compliance with Council policy.

**Financial Implications:** **1. Background:**

The Council's existing approved capital programme as at September 2020 was £82.2m, with a further £2.985m of earmarked schemes expected to be approved. These

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

schemes will require capital receipts of £8m from a forecast total of £15.3m based on the disposals approved in September 2020. Earmarked schemes currently not reflected in the figures above total £44.9m, with a forecast £33.2m of corporate funding from capital receipts needed to finance these schemes. Assuming that the planned disposals proceed there is a forecast balance of £7.343m of capital receipts to fund future earmarked capital schemes, meaning the broader capital ambition of the Council is currently unaffordable until such time as additional capital receipts are generated.

## **2. Oxford Park/Day Services Review:**

In March 2018 Executive Cabinet approved a capital budget of £455k for Oxford Park. This original proposal is now no longer thought to be fully achievable or represent value for money, and other proposals (both in terms of alternative service delivery and other capital schemes) are now being identified as part of a broader review of Day Services provision.

The scheme, or an alternative, was originally expected to deliver revenue savings of £267k over 2019/20 and 2020/21. The revenue budget forecast now assumes these will not be delivered, and it is therefore essential that alternative proposals to achieve savings are implemented urgently. Part of the Council's Improved Better Care Fund (IBCF) allocation was originally committed to support the start up and running of the Oxford Park service, but this funding has since been allocated to other pressures and is no longer available.

The capital funding originally allocated to Oxford Park was drawn from a dedicated grant and remains available to Adult Services, should a suitable proposal be identified.

## **3. 4C Community Centre:**

In March 2018 Executive Cabinet approved a capital budget of £150k for the 4C Community Centre in Ashton, to be matched by £51.5k of funding from other sources to be raised by 4C. The project is intended to support the delivery of a community-based development building on the successful Grafton Centre model. There have been recurring delays to this project due to change in contractors and most recently difficulties over the COVID period. However, work is expected to recommence at the end of November, with completion due in March and the remaining matched funding now obtained in full.

## **4. Moving with Dignity:**

Funding for the Moving with Dignity scheme was approved in July 2019 with the intention of reducing the volumes of, and expenditure on, domiciliary care provided on a 'double-handed' basis requiring two carers, where revised handling techniques and home adaptations could allow care to be delivered by a single carer only. Spending against these funds is slightly behind profile for this point in the year because of delays in recruiting to vacancies that have arisen in the team. The volumes of assessed clients and reduced hours are set out in detail in section 4 below, with the overall

reductions in demand on services estimated to be equivalent to around 966 hours per week or £570k annually. It should be noted that whilst the project is thought to have significantly reduced the general volume of homecare hours delivered, the broader increase in demand for homecare over recent months (particularly during the COVID period) has meant this has curtailed an overspend, rather than produced an outright saving.

#### **5. Disability Assessment Centre:**

Work is continuing to identify a potential location for the Disability Assessment Centre and until this is achieved, it is difficult to make an assessment of the final cost or timescales of the project. There will also be staffing and other operational costs (maintenance, utilities, rates etc.) for any new office that opens and it will be necessary to provide a suitable budget for these.

#### **6. Brain in Hand:**

The evaluation of the scheme has been extended at no additional cost, but to date, no specific cost reductions arising from the scheme have been identified. An evaluation has been drafted to establish to what extent users of the application may require less intervention from social services or the NHS, or benefit from improved outcomes in work or education. At this stage it is not established whether these would translate to cashable reductions in demand for services either to the Council itself, or to other bodies in the care system.

#### **7. Mount Street:**

The Executive Cabinet held on 26th August originally approved £50k of funding from the Disabled Facilities Grant (DFG) for developments at the new Mount Street supported accommodation project, originally endorsed by Strategic Commissioning Board. There is now a request to apply a further £50k of DFG, bringing the total capital funding to £100k. This expenditure is anticipated to ensure Mount Street can better support the needs of a wider range of service users, and improve the experience and safety of the users already in situ. The new facility will allow a number of out-of-borough and off-contract placements to be replaced more cheaply by in-house provision, as well as providing for the needs of future clients who might otherwise require external placements.

#### **8. DFG and related adaptations**

Progress against this year's allocation of funding is shown in the table, with expenditure behind the profiled forecast for this point in the year given delays over the COVID period.

#### **9. Housing Adaptations Service**

The operating costs of the scheme and its progress against the current budget are set out below. It is now proposed to revise the accounting arrangements of the scheme so that the salaries of those staff working on Housing Adaptations are capitalised, which will remove the requirement to charge VAT

on improvements delivered through the scheme, and should allow service delivery to be funded with more certainty.

The change in the methodology for recovering costs will ensure that the full costs of the scheme are funded, and gives reassurance to the contracting service.

**Legal Implications:**  
**(Authorised by the Borough Solicitor)**

Members will be aware that this is a general report providing a high-level overview of a number of projects which are subject to their own due diligence, governance and decision making.

The report provides details of the impact of the Covid pandemic on a number of the projects, which highlights the need for continued robust project management and review of expenditure to ensure value for money.

Members will note the proposal to capitalise staffing costs in relation to the Disabled Facilities Grant. For Cabinet to be able to consider this it needs to be content that an appropriate due diligence exercise has been undertaken to ensure that this is permitted under the terms of the grant and the accounting regulations and that the application of the capitalisation in relation to which salaries/part salaries will be capitalised and the methodology for identifying the same are clear.

**Risk Management:**

Risks are contained within the body of the report.

**Access to Information:**

The background papers relating to this report can be inspected by contacting:

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## 1. INTRODUCTION

1.1 This report seeks to provide an update on the projects that are funded through Capital monies and delivered through the Adults Directorate. A number of these projects are funded through the Disabled Facilities Grant (DFG).

1.2 These projects include:

	<b>Project</b>	<b>Amount approved</b>
1	Review of the day time offer	£455k
2	Christ Church Community Developments (CCCD)	£150k
3	Moving with Dignity (Single Handed Care)	£375k DFG
4	Disability Assessment Centre	£250k DFG
5	Brain in Hand	£20k DFG

1.3 This report also contains details of a new scheme for supported accommodation in Mount Street, Hyde. On 5 August 2020 the Strategic Commissioning Board approved £50k of DFG to be committed to this project. The Strategic Planning and Capital Monitoring Panel (SCMP) is now asked to recommend to Executive Cabinet the approval and commitment for a further £50,000 towards the additional works described in the body of this report at section 7. This will take the total DFG allocation and commitment of this scheme to £100,000 and be included as part of the overall Capital plan.

1.4 The DFG budget has been transferred from the Growth Directorate, and it will now be reported within the Adults directorate report. Details about the wider DFG and other related adaptation funding are therefore also contained within this report.

1.5 Lastly, this report contains a request for the change the methodology by which the Housing Adaptations Service is resourced. From the current fee based structure to one of direct capitalisation of salaries directly from the Disabled Facilities Grant

## 2. DAY TIME OFFER

### **Progress Update**

2.1 The proposal at Oxford Park will not proceed for the time being, and will now be reconsidered as part of a wider review of the offer of day time provision. A revised business case will be put forward for any new proposal that emerges. The funding and budgeting implications are discussed under the 'financial implications' on the front of the report.

## 3. CHRIST CHURCH COMMUNITY DEVELOPMENTS (CCCD) - 4C COMMUNITY CENTRE

### **Background**

3.1 The development of the 4C Community Centre capital investment was approved by Executive Cabinet in March 2018. As reported previously, the focus of the 4C community centre is that of providing a whole family offer with services and support to all members of the family from children through the spectrum to grandparents.

### **Progress Update**

3.2 Since the approval of the Capital grant by Executive Cabinet in March 2018, there has been a change in contractors which as reported at the last panel meeting, resulted in an increase of

£34k in costs and an increase in the match funding required to be raised by CCCD. The additional costs were due to the change in contractor and their increased price, increased cost of materials and the delay in funding being made available.

- 3.3 However, due to the delays as a result of the restrictions of the Covid pandemic, the Trustees of 4C were able to negotiate terms and conditions with an alternative construction company who have been able to offer a preferred arrangement which now meets the original costs of the contract. The contractor is also able to offer an advanced arrangement whereby they will be contributing to the delivery of the contract through their social responsibility to the community and will be working in partnership with the College and volunteers to assist the completion of the project.
- 3.4 Discussions have taken place with CCCD and the new contractors to agree a new service specification and it has now been confirmed that work will commence on site on 30 November 2020 with an estimated completion date of 5 March 2021.
- 3.5 CCCD have previously obtained funding from Viridor Credits to the value of £50k. Due to the new contractor arrangements now in place, the match funding required has now been achieved in full and will also allow for the purchase of new equipment/furniture etc. that is needed within the centre. This will also be delivered and supported through voluntary hours given in kind to complete the development.
- 3.6 Since the last report, it has been confirmed that the registration of the charge with Companies House and Land Registry is in process.
- 3.7 The grant agreement includes details of the original payment schedule. Table 1 shows the amended schedule due to the delays experienced (as detailed in section 3.4 of the report). Payments due from February and March 2020 have been made and payments will recommence in December 2020 for the remainder of the schedule. The table includes the amended dates for payment based on the work commencing in November 2020.

<b>Amount of Grant payable</b>	<b>Date of Payment</b>
<b>£15,000</b>	February 2020
<b>£15,000</b>	March 2020
<b>£55,000</b>	December 2020
<b>£35,000</b>	January 2021
<b>£15,000</b>	February 2021
<b>£15,000</b>	March 2021
<b>£150,000 TOTAL</b>	

- 3.8 The amended milestones are shown in the table below.

<b>Key Milestone</b>	<b>Target Date for Completion</b>
Build start (14 weeks)	30 November 2020
Build completion	5 March 2021
New facility open	April 2021

- 3.9 The primary risks associated with 4C include the potential high take up of places; which is a positive outcome, but will need to be managed effectively. Intensive, ongoing engagement with communities has taken place and consultation has highlighted that people are very interested

in the centre and take up will be high. Plans are in place to focus on all areas of the community and good relationships have already been achieved and are being maintained.

- 3.10 The centre already has a pool of volunteers and trustees and could be supported by paid workers once the centre is financially viable.
- 3.11 Because of the restrictions put in place due to Covid-19, structural and internal design changes have needed to be made to ensure that the building is safe for members to attend post Covid and with social distancing guidelines and practice in place. CCCD are also putting into place a Special Measures/Risk Assessment to ensure that all safe practice is adhered to and risk is managed effectively.

#### 4 MOVING WITH DIGNITY (SINGLE HANDED CARE)

##### Progress Update

- 4.1 The capital funding for the Moving with Dignity (also referred to as 'Single Handed Care') scheme was approved on 24 July 2019 at Executive Cabinet. It is an investment of £0.375m Disabled Facilities Grant in a dedicated team, tasked with reducing the instances of double-up staffing in order to undertake safe manual handling activities associated with the provision of care and support. The team has also supported the wider homecare workforce in implementing the new single or reduced-handling approach.
- 4.2 A core team of staff was established, but there have been delays in recruitment over recent months and consequently there has been less expenditure against the Moving With Dignity (MWD) funding than was originally profiled for this point in the year. The gap will be made up once the current vacancy is filled and it may be possible for the project resourcing to stretch for a longer period. Training has also been provided for eight additional Occupational Therapists and Manual Handlers across the Neighbourhood teams. During the COVID period, the MWD team have also supported the wider workforce in facilitating timely hospital discharge. There have also been 17 reassessments to prevent an increase in the care package back from reduced to double-handed handling.
- 4.3 The team are working closely with colleagues in Finance to track reductions in care and estimate the resulting savings. As of 6 November 2020, the following table summarises the work to date:

Assessment completed and new approach implemented	94
Assessment completed and client assessed as unsuitable	80
<b>Total Completed Assessments</b>	<b>174</b>
<b>Passed away since start of assessment</b>	<b>24</b>
Assessment ongoing	7
Potential assessment	47
<b>Total Pending Assessments</b>	<b>54</b>
<b>Community reassessments</b>	<b>17</b>
<b>Total Cases in Scope</b>	<b>269</b>

- 4.4 Where single-handed approaches had been implemented to date, it is estimated that reductions had been made to care packages equivalent to 966 home care hours and 44 night calls per week, and the Council no longer bears the cost of delivering these services. The gross saving will be offset by a reduction in client fees, given that some service users will pay

less towards the cost of their care as their packages are reduced, and it is also likely in some cases that the benefit will only be short-term as clients' needs change. Overall, after the reduction in client income and the effect of newly increased needs in care packages is considered, the net benefit of the work in 2020/21 to date is estimated to be £570k, which has assisted the Council and its homecare providers in managing the increased demand for care over recent months and the recent budget pressure.

- 4.5 The key risks associated with the MWD project remain the same as reported previously and as described above, relating mainly to the impact of Covid-19 and the winter period on available staff for this project, and the potential for them to be moved to support other parts of the system in crisis, such as hospital discharge.

## **5 DISABILITY ASSESSMENT CENTRE**

### **Progress Update**

- 5.1 Since the last report was presented in September 2020, progress is described below.
- 5.2 A recently visit to Hyde Market Hall was carried out with a view to determining if the location was suitable to locate the Disability Assessment Centre (DAC). An initial visit provided positive feedback regarding the access, parking, space etc and as a result further investigations will be undertaken..
- 5.3 The space would be accessible to all users and its location would provide a self-contained space to deliver the services intended. Removal of existing market units would be easy to provide the necessary floor space due to there being no structural walls. There is provision for all services and it could be possible to provide working specialist toilets and bathing facilities within the DAC. It should be possible to install a working step-lift as an alternative means of access to whichever level is deemed the most appropriate for the DAC. There is enough height in the market to allow installation of working stair lifts.
- 5.4 Bus services from most of the rest of the borough pass through Hyde. Some potential users may need to change buses in Ashton but generally the use of the DAC would be for those service users who are reasonably mobile or have their own transport. Parking facilities are relatively close to the shopping mall. The DAC would need to follow the opening hours of the Mall/ market but that would not be much different to the provision of a 9 to 5 service provision although it does give the opportunity to continue to provide a service on Saturdays should that be considered.
- 5.5 The Market Hall's future is the main issue to be considered. The Market hall is in need of major investment, although the capital earmarked for the DAC would be a substantial investment in a large portion of the hall. The future of the market hall needs resolving before too much time is invested in locating the DAC here.
- 5.6 In addition to the risk of the future of the Market Hall, other risks associated with the DAC remain unchanged and the impact of Covid-19 to ensure assessments are carried out adhering to effective social distancing guidance, infection control and carrying out thorough risk assessments. The demand for Occupational Therapy services remains high and continues to be monitored.

## **6 BRAIN IN HAND**

### **Progress Update**

- 6.1 Since the last update on 21 September 2020, work has been underway to refer more people who could benefit from Brain in Hand (BiH) technology. Of the total 20 licences, 12 have currently been activated, and of those four are in the process of being set up.



- 6.2 An evaluation methodology has been agreed, and the preferred approach is to baseline individuals before they start to use Brain in Hand, check in with them whilst they are using it every 2-3 months, and capture how they felt at the end of the process as well. There will be a mixture of qualitative and quantitative data through this process and at regular intervals, which will inform the investment viability in the future.
- 6.3 Because of the pandemic, and limited support that BiH has been able to offer during this time (BiH made the decision to furlough their staff at the start of the pandemic), a further six months' extension to the contract has been agreed in principle, and this would be at no further cost. This would take the current contract end date to the end of May 2021. The process to formalise the contract extension is being worked through.
- 6.4 The project continues to identify suitable people to take-up all 20 licenses with a goal that all of these will be activated by the end of December 2020.

## 7 MOUNT STREET, HYDE – SUPPORTED ACCOMMODATION

### Progress update

- 7.1 A report submitted to the Strategic Commissioning Board on 5 August 2020 described two schemes proposed for supported living within Tameside. One of these, Mount Street in Hyde developed by Irwell Valley Housing Association (IVHA), was already under construction at the time and was due to be completed shortly. The proposal identified was to convert the building to meet the requirements of supported living. The development would increase the provision of supported living within the Borough for adults with a learning disability and/ or physical disability, and/or mental health needs to live in their own homes.
- 7.2 The recommendation contained within the report of 5 August was to commit £50k funding from the overall allocation of funds for Disabled Facilities Grant, and this was approved. This initial outlay was to offset some of the costs already incurred in carrying out the adaptations required to meet the needs of the overall provision of supported housing.
- 7.3 Since then, a more detailed evaluation (initially delayed over the COVID period) of the needs of Mount Street's proposed tenants has been carried out. This has identified client needs including pressure-operated doors, adapted showers, and other improvements that will make Mount Street more suitable for a broader range of range of service users, and improve the experience and safety of the users already in situ.
- 7.4 The initial report via Strategic Commissioning Board contained a request for an initial £50,000 DFG towards initial works at Mount Street. The Strategic Planning and Capital Monitoring Panel is now asked to recommend to Executive Cabinet the approval and commitment for a further £50,000 towards the additional works described above. This will take the total DFG allocation and commitment of this scheme to £100,000 and be included as part of the overall Capital plan.

## 8 DISABLED FACILITIES GRANT AND OTHER RELATED ADAPTATIONS FUNDING

- 8.1 The current situation regarding progress with delivery of adaptations is listed in the table below as of end October 2020

Referrals received in year	144	Urgent and Substantial	From Adults and Children's Services
Approved schemes	162	Urgent and Substantial	Including 55 carried over from 2019-20.

			There are no approvals on hold due to Covid19
Completions to date	101	Urgent and Substantial	
Scheme currently being worked on – not yet approved	68	Urgent and Substantial	Including 2 on hold due to Covid19
Budget committed	£1,251,935	Value of schemes approved and ordered	Major and Minor Adaptations
Expenditure to date	£739,084	As per Agresso – includes minor works and fees	as at end October
Referrals awaiting allocation	17	Current waiting list for Substantial	Oldest referral is dated 01 June 2020
Referrals cancelled	23		8 Clients passed away. 6 decided not to proceed for various reasons. 3 decided to move house. 3 have gone into care. 1 cancelled due to carrying out their own work 1 due to re-assessment and 1 due to deciding to make their own application
Minor Adaptations Ordered	202	All tenures	Including 70 carried over from 2019-20
Minor Adaptations Completed	108	All tenures	

### **Housing Adaptations Service – Capitalisation Of Salaries**

- 8.2 The Housing Adaptations Service provides support to residents of Tameside to assist them in making applications for grant assistance toward adaptations utilising funds allocated to the Council through Disabled Facilities Grant. The service also designs the adaptations, specifies the works, obtains prices, oversees the work and ensures the works are complete to a reasonable standard, including making payments to contractors. It also provides support to the Occupational Therapists in Adults and Children's Services on a wide range of technical issues.
- 8.3 The current arrangement for resourcing the staff involved with Disabled Facilities Grants is based on a charge made against each approved grant of 12.5% (plus VAT) of the total cost of works. A plan drawing fee of £150 or £450 (plus VAT) can be charged dependent upon the type of scheme. Following recent increases in pay the current arrangement of charging fees still does not entirely cover the cost of the service. The income received in 2019/20 was £239k, compared to costs of running the service of £249k. Under the current arrangements, the shortfall is covered from corporate revenue funding held in Growth but is expected to grow in the coming years.
- 8.4 Housing Adaptations Services is reliant on a regular pipeline of referrals from Occupational

Therapists in Adult and Children's Services. The actual fees charged are then dependent upon the value of the works approved. The number, complexity and value of referrals fluctuates over the years making it difficult to predict what income the Service will raise. The current fee-charging regime was introduced four years ago to reduce the gap between operating costs and income.

- 8.5 Following consideration, it is proposed that the methodology for funding the service is amended to one based on capitalisation of the salaries of those people who are directly employed to work on Disabled Facilities Grants, as outlined in the table below. Capitalisation of salaries is an agreed and approved method for capital projects compliant with accounting regulations, and is already utilised across several other capital projects including Education and Highways. As of 2019, three other Greater Manchester authorities also used a capitalisation approach. The new arrangements will provide a much simpler and more transparent process, and will ensure salary costs are covered.

<b>Position</b>	<b>Grades</b>	<b>Basic</b>	<b>NI</b>	<b>Pension</b>	<b>Total Cost</b>
Housing Adaptations Manager	J	44,535	4,925	9,352	58,812
Senior Adaptations Surveyor	H	34,475	3,537	7,240	45,252
Senior Adaptations Surveyor	H	34,475	3,537	7,240	45,252
Senior Adaptations Surveyor	H	34,475	3,537	7,240	45,252
Strategic Property Support Officer Level 2	E	23,369	2,004	4,908	30,281
Strategic Property Support Officer Level 3	F	26,843	2,484	5,637	34,964
<b>TOTAL</b>		<b>198,172</b>	<b>20,024</b>	<b>41,617</b>	<b>259,813</b>

- 8.6 Capitalisation of salaries is the preferred method of funding the service, as under the present model it would require a substantial increase in fees charged to offset the true cost of operating the service. This would take Tameside to the top of the fee-charging regime in Greater Manchester compared to other authorities, when the maximum currently charged in GM is 15%. Each month the individual fee charged on every grant is manually transferred from the capital account to the revenue account. This is a time-consuming process and can lead to errors, with individual fees having to be calculated and charged individually to each grant at approval stage.
- 8.7 In addition, in a fee-charging model the service is required to charge VAT on each grant it approves, given that a service is provided to the individual grant applicant. This VAT cost is added to the grant awarded and is an unnecessary drain on the DFG allocation. During 2019/20 the amount of VAT charged was in excess of £45,000. Moving to capitalisation of salaries would avoid this requirement, and instead allow the largest possible amount of funding to be applied to actually providing improvements.
- 8.8 The proposal is considered reasonable due to the fact it meets the general requirements for the provision of adaptations: the service is set up for and designed to provide support to disabled people. There is no requirement to charge VAT within this proposal and funds will therefore remain available for adaptations.

## **9 NON –ADAPTATION WORKS (DISCRETIONARY ASSISTANCE)**

- 9.1 There are currently four schemes for Home Repair Assistance under preparation and a further four at the enquiry stage. Recently received enquiries have not progressed to a formal grant application due to failure to return the application form. There is no further update on these enquiries due to the need to focus on delivery of adaptations.

## **10 CONCLUSION**

- 10.1 Progress against all capital projects continues at pace where possible. Learning from the pandemic and first lockdown has all been built into processes and assessments of people's needs. New ways of working have been implemented to support progress and continue to achieve the best outcomes for local people, especially those clinically extremely vulnerable.
- 10.2 All costs and benefits are being constantly reviewed and revised to factor in the part-year impact, taking into account people's changing needs especially through the pandemic, and ensuring the right support is in place, whether that be assessment staff or adaptations to enable people to remain as independent as possible in their own homes.
- 10.3 Further schemes, such as the supported accommodation at Mount Street will further strengthen our collective goal to ensure people are able to maximise their independence for as long as possible, and be brought closer to home where their loved ones reside. This not only ensures outcomes are achieved for individuals but will also have positive financial implications.
- 10.4 The DFG and other related adaptations funding has been reported through the Adults Capital Monitoring report for the first time, and will continue to be reported in this way in the future.

## **11 RECOMMENDATIONS**

- 11.1 As set out at the front of the report.