



Oversight and Governance

Chief Executive's Department

Plymouth City Council

Ballard House

Plymouth PL1 3BJ

T 01752 305155

www.plymouth.gov.uk/democracy

Published 26/09/25

Delegated Decisions

Delegated Executive/Officer Decisions

Notice of call-in for non-urgent decisions must be given to the Democratic Support Team by 4.30 pm on Friday 03 September 2025. Please note – urgent decisions and non-key Council Officer decisions cannot be called in. Copies of the decisions together with background reports are available for viewing as follows:

- on the Council's Intranet Site at <https://modgov/mgDelegatedDecisions.aspx>
- on the Council's website at <https://tinyurl.com/3hwmppzp>

The Cabinet Member decisions detailed below may be implemented from 5pm on Friday 03 October 2025 if they are not called-in.

The non-key officer decision may be implemented immediately.

Delegated Decisions

1. Councillor Tudor Evans OBE - Leader of the Council:

- 1.a. L11 25/26 - 2025/26 Disabled Facilities Grant (DFG) Allocation & 2025/26 Plymouth Community Homes (PCH) Contribution **(Pages 1 - 22)**

2. Councillor Jemima Laing - Deputy Leader and Cabinet Member for Children's Social Care, Culture and Communications:

- 2.a. DL02 25/26 Plymouth Sound National Marine Park (PSNMP) Mount Batten Pontoon **(Pages 23 - 74)**

3. Councillor Chris Penberthy - Cabinet Member for Housing, Cooperative Development and Communities:

- 3.a. HCD-02 25/26 - Independent Living Policy Review 2025 **(Pages 75 - 142)**

4. Council Officer Decision - Gary Walbridge Strategic Director for Adults, Health and Communities:

- 4.a. COD05 25/26 - Variation number 76 of contract PEO 16175 to allow for payment Rough Sleeping Prevention and Recovery Grant (RSPRG) Funding for 2025 -2026 **(Pages 143 - 160)**

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER


Executive Decision Reference Number – L11 25/26

Decision	
1	Title of decision: 2025/26 Disabled Facilities Grant (DFG) Allocation & 2025/26 Plymouth Community Homes (PCH) Contribution
2	Decision maker: Councillor Tudor Evans OBE, Leader of the Council
3	Report author and contact details: Dave Ryland (Head of Housing Standards) 01752 304823 dave.ryland@plymouth.gov.uk Matt Garrett (Service Director of Community Connections) matt.garrett@plymouth.gov.uk
4	Decision to be taken: <ol style="list-style-type: none"> 1. Approve the briefing note; 2. Allocate £3,491,445 to the Capital Programme funded by Better Care Funding for the provision of mandatory Disabled Facilities Grants and assistance offered through the Independent Living Policy in 2025/26; 3. Approve up to a maximum £400,000 during financial year 2025/26 (limited to actual funding received from Plymouth Community Homes) to be added to the capital programme to replenish funding used from the DFG capital programme for the provision of mandatory DFG adaptations in PCH properties; 4. Approve the removal of £109,877.85, reflect unspent funds allocated for adaptations in Plymouth Community Homes (PCH) properties in 24/25; 5. Delegate the approval of spend and the award of contracts to the Strategic Director for Adults, Health and Communities, where they would otherwise not have authority to do so.
5	Reasons for decision: <ol style="list-style-type: none"> 1. Disabled Facilities Grants (DFGs) are a statutory requirement under the Housing Grants, Construction and Regeneration Act 1996. Failure to allocate and deliver these grants would prevent the provision of essential major adaptations, potentially leading to increased complaints of maladministration, financial penalties, reputational damage, and negative media attention. 2. Impact and Value - DFGs significantly enhance the quality of life for recipients, their carers, and families. Effective use of these grants helps reduce demand on social care services by enabling individuals to live safely and independently in their own homes. 3. Partnership Funding - Plymouth Community Homes (PCH) has agreed to contribute up to £5,000 per adaptation in their properties (excluding stairlift installations), with a maximum annual contribution of £400,000 for 2025/26. Invoices for completed works are issued retrospectively on a quarterly basis.
6	Alternative options considered and rejected:

	<p>DFG's are mandatory governed by the 1996 Housing Grants, Construction and Regeneration Act. The likely consequences for the council in not providing DFG's will be increasing complaints of maladministration, with resulting fines, and negative perceptions and media coverage.</p> <p>DFG's greatly improve quality of life for clients, their careers and family members and effective use of the grants will help contain the potential increase in associated costs to Social Care Services.</p>														
7	<p>Financial implications and risks:</p> <p>For 2025/26, the approved £3,491,445 Disabled Facilities Grant (DFG) budget is fully funded through a government grant, ring-fenced within the Better Care Fund (BCF).</p> <p>Revenue Implications</p> <p>Staff costs associated with the delivery of DFG works are capitalised and therefore partially funded from the capital allocation. There are no additional direct revenue implications. However, evidence indicates that DFG provision helps reduce revenue pressures across other services, including Adult Social Care, Children's Services, residential care, and health services. This aligns with the BCF's objective to integrate health, social care, and housing to deliver person-centred, sustainable care and improved outcomes.</p> <p>Additional Funding Impact</p> <p>If fully utilised, the £400,000 contribution from Plymouth Community Homes (PCH) could support approximately 35 additional adaptations in 2025/26, further extending the reach and impact of the DFG programme.</p> <p>Governance</p> <p>The funding and delivery of DFGs as outlined in the BCF settlement has been formally agreed and is supported by the Integrated Health and Wellbeing Board (IHWB).</p>														
8	<p>Legal Implications: (For completion by Legal Officers)</p> <p>No legal implication – Ian Wills</p>														
9	<p>Is the decision a Key Decision? (please contact Democratic Support for further advice)</p> <p>Please type an X into the relevant boxes</p>	<table border="1"> <thead> <tr> <th>Yes</th><th>No</th><th>Per the Constitution, a key decision is one which:</th></tr> </thead> <tbody> <tr> <td></td><td>X</td><td>in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total</td></tr> <tr> <td></td><td>X</td><td>in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1 million annually</td></tr> <tr> <td></td><td>X</td><td>is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.</td></tr> </tbody> </table>	Yes	No	Per the Constitution, a key decision is one which:		X	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total		X	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1 million annually		X	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.	
Yes	No	Per the Constitution, a key decision is one which:													
	X	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total													
	X	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1 million annually													
	X	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.													
	<p>If yes, date of publication of the notice in the Forward Plan of Key Decisions</p>	N/A													
10	<p>Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy</p>	<p>The provision of Disabled Facilities Grants (DFGs) directly supports the cooperate plan to "keeping children, adults and communities safe" by promoting independence, reducing health and social inequalities, and enabling individuals to live</p>													

	framework and/or the revenue/capital budget:	<p>with dignity and respect. Major adaptations funded through DFGs allow people to remain safely in their homes, helping to mitigate rising costs in health and social care and reducing risks for disabled individuals, their families, and carers.</p> <p>This approach aligns with the Care Act 2014, which places wellbeing at the heart of adult social care. Local authorities are required to consider the suitability of living accommodation as part of their duty to promote wellbeing. Major adaptations serve as a preventative measure, enhancing quality of life and enabling individuals to live independently for as long as possible.</p> <p>Keeping children, adults and communities safe.</p> <p>Focusing on prevention and early intervention.</p> <p>Spending money wisely.</p>		
I I	Please specify any direct environmental implications of the decision (carbon impact)	Please see attached Climate Impact Assessment.		
Urgent decisions				
I 2a	Is the decision urgent and to be implemented immediately in the interests of the Council or the public? Please type an X into the relevant box	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	X	(If no, go to section I 3a)
I 2b	Reason for urgency:			
I 2c	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
I 3a	Are any other Cabinet members' portfolios affected by the decision? Please type an X into the relevant box	Yes	X	
		No		(If no go to section I 4)
I 3b	Which other Cabinet member's portfolio is affected by the decision?	Councillor Chris Penberthy - Cabinet Member for Housing, Cooperative Development and Communities		
I 3c	Date Cabinet member consulted	16 July 2025		

14	Has any Cabinet member declared a conflict of interest in relation to the decision? Please type an X into the relevant box	Yes		If yes, please discuss with the Monitoring Officer				
		No	X					
15	Which Corporate Management Team member has been consulted?	Name	Gary Walbridge					
		Job title	Strategic Director Adults, Health and Communities					
		Date consulted	01 July 2025					
Sign-off								
16	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)	JS26 25/26					
		Finance (mandatory)	ITG.25.26.061					
		Legal (mandatory)	IW 5232					
		Procurement (if applicable)	N/A					
		Corporate property (decisions involving Council owned land or facilities) (if applicable)	N/A					
		Human Resources (if applicable)	N/A					
Appendices								
17	Ref.	Title of appendix						
	A	25.26 DFG Funding Briefing for Cabinet Executive Delegated Decision						
	B	Equalities Impact Assessment EIA - ILA (July 2025)						
	C	Climate Impact Assessment - CIA – DFG Funding 25.26						
Confidential/exempt information								
18a	Do you need to include any confidential/exempt information? Please type an X into the relevant box	Yes		If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)				
		No	X					
		Exemption Paragraph Number						
		1	2	3	4	5	6	7
18b	Confidential/exempt briefing report title:							

Background Papers								
19	<p>Please list all unpublished, background papers relevant to the decision in the table below.</p> <p>Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</p>							
Title of background paper(s)		Exemption Paragraph Number						
		1	2	3	4	5	6	7
Cabinet Member Signature								
20	<p>I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.</p>							
Signature				Date of decision		22 September 2025		
Print Name		Councillor Tudor Evans OBE, Leader of the Council						

This page is intentionally left blank

Disabled Facilities Grant Capital Funding Briefing

2025/2026 – Community Connections



Overview

This Executive Decision relates to the allocation of the Disabled Facilities Grant (DFG) for 2025/26, funded through the Better Care Fund (BCF). The Council has a statutory duty under the Housing Grants, Construction and Regeneration Act 1996 to approve mandatory DFGs for major adaptations, supporting individuals of all ages to live independently in safe, suitable housing. This contributes to reducing pressures on social care services and preventing hospital admissions.

Legislative and Strategic Context

DFGs are mandatory and subject to a means test unless covered by discretionary provisions. They fund essential adaptations that enable individuals to remain in their homes with dignity and independence. Since 2015/16, DFGs have been included in the BCF to encourage integrated, strategic planning across health, social care, and housing.

Plymouth's Disabled Facilities Grant (DFG) allocation for 2025/26 has increased to £3,491,445, up from £3,069,132 in 2024/25. This will be supplemented by a carry-forward of £1,014,173.52, although £109,877.85 will be deducted to reflect unspent funds allocated for adaptations in Plymouth Community Homes (PCH) properties. The carry-forward is largely attributed to delays stemming from COVID-19, Brexit-related supply chain disruptions, and the increasing complexity of adaptation works.

In addition, Plymouth Community Homes has committed a further £400,000 to support the delivery of adaptations for residents in their properties, reinforcing the partnership approach to meeting local housing and care needs.

Delivery Performance and Pipeline

In 2024/25, Community Connections completed 280 cases, delivering 424 individual adaptations. Each case typically involves multiple interventions, ranging from stairlifts and ramps to full extensions and loft conversions.

As of the start of 2025/26:

- 98 active cases are ongoing, with a committed spend of £1,204,125.20
- 217 validated cases are ready to progress, with a forecast cost of £1,820,900
- 114 pre-validation cases are in the pipeline, estimated at £873,900
- 142 cases are within Plymouth Community Homes (PCH) properties

Procurement and Quality Assurance

The Dynamic Purchasing System, introduced in 2019, continues to be used to engage competent local contractors through competitive tendering. All works are covered by a two-year insurance-backed warranty, with optional extensions available to clients.

Forward Planning and Risk Management

Demand for DFGs in 2025/26 is expected to exceed the available budget. Community Connections will manage this through:

- Ongoing review of validated cases to prioritise based on need and budget
- Continuation of the Discretionary Funding Panel for high-cost cases
- Engagement with PCH to actively engage with adaptations in their properties to reduce associated costs.
- Supplier engagement to secure best market prices
- Rigorous value-for-money assessments for all proposed works

- Expansion of fast-track stairlift delivery to reduce waiting times and improve client safety
- Implementation of a post-completion customer feedback process to inform service improvements
- Implement new case management systems to reduce the burdens on teams and increase customer satisfaction

Community Connections will continue to prioritise cases based on referral date and clinical need, as assessed by Livewell Southwest and Children's Social Care.

EQUALITY IMPACT ASSESSMENT – DISABLED FACILITIES GRANTS – COMMUNITY CONNECTIONS

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Stephen Evans – Major Adaptations Manager	Department and service:	Major Adaptations, Community Connections	Date of assessment:	28 July 2025
Lead Officer: Head of Service, Service Director, or Strategic Director.	Dave Ryland Head of Housing Standards	Signature:	D.Ryland	Approval date:	31 July 2025
Decision required:	<p>The Council has a statutory duty to approve mandatory Disabled Facilities Grants (DFGs) for major adaptations. This work helps people to live independently in their own homes, thereby helping to contain the potential increase in costs to Social Care Services.</p> <p>The legislation governing DFGs is the Housing Grants, Construction and Regeneration Act 1996. DFGs are mandatory and are available from Local Authorities in England and Wales, subject to a means test. The purpose of the Grant is to provide adaptations to the home environment to promote independence and allow people to remain in their own homes.</p> <p>Please note that this document is based on information from the 2021 UK census and hence DFG data has been updated since the previous Equality Impact Assessment.</p>				

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	Yes		No	x
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x

Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes	x	No	
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	N/A			

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
--	--	----------------	-----------------------	--------------------------------------

Age	<p>Plymouth</p> <ul style="list-style-type: none"> 16.4 per cent of people in Plymouth are children aged under 15. 65.1 per cent are adults aged 15 to 64. 18.5 percent are adults aged 65 and over. 2.4 percent of the resident population are 85 and over. <p>South West</p> <ul style="list-style-type: none"> 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none"> 17.4 per cent of people are aged 0 to 14. 64.2 per cent of people are aged 15 to 64. 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p> <p>Respondents aged '16-24' were <u>significantly</u> less likely to agree Plymouth's Sound is special to the city (71%) compared with those aged '25+' (89%-97%). (City Survey 2022)</p>	<p>Older people and younger people are recognised as potentially vulnerable groups.</p> <p>The DFG is means tested.</p> <p>Homes that cannot be adapted to meet the occupier's need.</p> <p>Owner occupiers are encouraged and supported to move to a more suitable home. Tenants are supported to find more suitable accommodation either via Community Connections or Devon Home Choice.</p> <p>Services offered in lieu of DFG – NIL Grant Application (please see Plymouth City Council Independent Living Assistance Policy 2025, section 3.9) with a fee of 1% of the cost of the works payable to Independence Community Interest Company (INCIC) for the use of the Dynamic Purchasing System (DPS) and a further 2.5% of the cost of the works payable to Plymouth City Council (PCC) to cover administration costs.</p>	<p>Advice for those with a means-tested contribution to make towards the cost of their DFG works.</p>	<p>Ongoing, Community Connections, Head of Housing Standards</p>
-----	--	---	---	--

<p>Care experienced individuals</p> <p>(Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>	<p>No adverse implications anticipated.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
--	--	---	------------------------	------------------------

Disability	<p>9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)</p> <p>Respondents with 'no limiting disability or health problem' (92%) were <u>significantly</u> more likely to agree with the statement Plymouth's Sound is special to the city than those who were 'limited a lot' (87%).</p>	<p>Limitations of the approved budget potentially result in some disabled people waiting for their adaptations. If the adaptations are considered eligible (e.g. following OT assessment and means testing) for grant funded works, they may have to wait.</p> <p>A prioritisation system is in place to ensure those most in need receive their adaptation soonest (please see Independent Living Assistance Policy 2025).</p>	<p>Continued monitoring of prioritisation process to ensure fairness and compliance by officers.</p> <p>Notification to customers of the anticipated wait time.</p>	Ongoing, Community Connections, Head of Housing Standards
Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans woman (2021 Census).	No adverse impact anticipated.	Not applicable.	Not applicable.
Marriage and civil partnership	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).</p>	No adverse impact anticipated.	Not applicable.	Not applicable.
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impact anticipated.	Not applicable.	Not applicable.

Race	<p>In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p> <p>Those identifying themselves as 'White' were <u>significantly</u> more likely to agree Plymouth Sound is special to the city (92%) compared with those identifying themselves as 'Any other ethnic group' (85%).</p>	<p>No impact anticipated.</p>	<p>Work with partners to promote services to the BME community.</p> <p>Review application rates from BME communities.</p> <p>Monitor the impact of promotion to BME communities.</p> <p>Policy and related documentation can be translated in to required language upon request via 'Translate Plymouth'. Publications for local information and marketing will be given to organisations using the most appropriate language. Organisations will be consulted on the most appropriate language and translation and other formats offered.</p> <p>Staff have been trained in Equality & Diversity and comply with the requirements.</p>	<p>Ongoing, Community Connections, Head of Housing Standards</p>
-------------	---	-------------------------------	---	--

Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>No adverse Impact.</p> <p>Small number of applicants from minority religions identified.</p>	<p>Work to promote services to minority groups.</p> <p>Review application rates from BME communities.</p> <p>Monitor the impact of promotion to BME communities.</p>	Ongoing, Community Connections, Head of Housing Standards
Sexual orientation	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p> <p>Respondents identifying as 'Heterosexual / Straight' (92%) were <u>significantly</u> more likely to agree with the statement Plymouth Sound is special to the city than those who identified as Bisexual / Gay / Lesbian (86%).</p>	No adverse impacts anticipated.	<p>Work with partners to promote services to Minority community.</p> <p>Review application rates from Minority communities.</p> <p>Monitor the impact of promotion to Minority communities.</p> <p>Staff have been trained in Equality & Diversity and comply with the requirements.</p>	Ongoing, Community Connections, Head of Housing Standards

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>Disabled Facilities Grant are aimed at improving health and safety within the home. This will help reduce hospital admissions and reduce the risk of admission to residential care.</p> <p>The Disabled Facilities Grant is contained within the Independent Living</p>	Not applicable.	Not applicable.

	<p>Assistance Policy 2025, which is written in line with the Equalities Act 2010. It therefore adheres to the UN Convention of the Human Rights as part of UK law.</p> <p>Plymouth City Council recognises Article 14 of the Human Rights Act – The right to receive Equal Treatment and prohibits discrimination including sex, race, religion and economic and social status in conjunction with the Equalities Act which includes age and disability.</p> <p>All staff and service users will be treated fairly, and their human rights will be respected.</p> <p>No adverse impact on human rights has been identified.</p>		
--	---	--	--

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to: <ul style="list-style-type: none"> promote equality, diversity and inclusion facilitate community cohesion support people with different backgrounds and lived experiences to get on well together 	No adverse impacts anticipated.	Not applicable	Not applicable.
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	Not within scope of the Independent Living Assistance (ILA) policy.	Not applicable.	Not applicable.

Build and develop a diverse workforce that represents the community and citizens it serves.	<p>All staff and service users will be treated fairly, and their human rights will be respected.</p> <p>No adverse impact on human rights has been identified.</p>	Not applicable.	Not applicable.
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.	<p>Disabled Facilities Grants are mandatory means tested grants, with no targeted intervention within communities. DFG is applicable to all tenures of housing.</p> <p>Mandatory grant is available to those with specific living requirements due to disability in relation to the home environment. The grant is available city wide and is means tested, therefore is targeted towards those who are unable to fund adaptations via their own funds.</p>	Not applicable.	Not applicable.

This page is intentionally left blank

Exec Decision for the additional allocation of Disabled Facilities Grants 2025/26

Project details

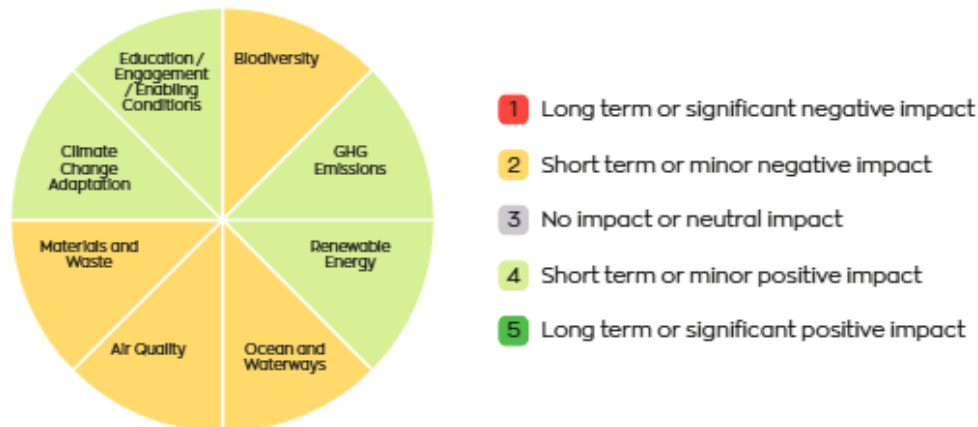
Assessment author

Dave Ryland

Project summary

Funding to deliver Major Adaptations in homes across Plymouth.

Summary of assessment



Assessment scores

Biodiversity

Score

(2) Short term or limited negative impact

Score justification

DFG works are done to improve the quality of life for clients by delivering major adaptations in peoples homes. This will see a range of building works undertaken in peoples homes.

Mitigatory measures applied:

We have controls on the system to utilise local contractors where possible.

GHG Emissions

Score

(4) Short term or limited positive impact

Score justification

DFG works are done to improve the quality of life for clients by delivering major adaptations in peoples homes. This will see a range of building works undertaken in peoples homes.

Renewable Energy

Score

(4) Short term or limited positive impact

Score justification

We are working with PEC and Low Carbon to share information in respect of our clients who would qualify for grants.

Ocean and Waterways

Score

(2) Short term or limited negative impact

Score justification

Some building works will be carried out to the perimeter of properties such as ramps. In constructing a ramp there will be a short increase in respect of water use and waste water created which is unavoidable.

Mitigatory measures applied:

We have changed from standard block construction ramping and are using modular ramping where possible reducing the amount of water waste. Further we are piloting new modular construction on larger projects.

Air Quality

Score

(2) Short term or limited negative impact

Score justification

We utilise only local firms in the delivery of major adaptations. This works to reduce the travelling required and reduces emissions.

Materials and Waste

Score

(2) Short term or limited negative impact

Score justification

To deliver adaptations in peoples homes we are required to remove existing and replace with new to meet a clients need. The removal of items frequently results in waste being created. We are working to increase our recycling of products used.

Climate Change Adaptation

Score

(4) Short term or limited positive impact

Score justification

Works delivered are done so in line with modern building construction methodology and as such aim to always achieve greater resilience.

Education / Engagement / Enabling Conditions

Score

(4) Short term or limited positive impact

Score justification

We are instigating work with contractors and suppliers in respect of Net Zero ambitions. We are currently out for consultation in respect of awarding more points to contractors (increasing their chances to be awarded works) who have measures in place to reduce their carbon footprint. Further we are looking to award more points to contractors who are working with apprentices thus educating the next generation of contractors.

This page is intentionally left blank

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER

Executive Decision Reference Number – DL02 25/26

Decision	
1	Title of decision: Plymouth Sound National Marine Park (PSNMP) Mount Batten Pontoon
2	Decision maker: Councillor Jemima Laing (Deputy Leader)
3	Report author and contact details: Sharon Mercer (Head of Strategic Programmes); Sharon.Mercer@plymouth.gov.uk ; +441752308808
4	Decision to be taken: <ol style="list-style-type: none"> 1. Approves the Business Case; 2. Allocates £2,093,698 for the project into the Capital Programme funded by Corporate Borrowing; 3. Confirms and allocates £264,000 from Improvements to Corporate Estate Fund to the Capital Programme; 4. Confirms and allocates £136,000 from Health and Safety Fund to the Capital Programme; 5. Delegates the award of the pontoon works contract to Service Director for Economic Development; 6. Delegates the decision of the ownership of the pontoon to the Strategic Director for Growth in consultation with the Mount Batten Board.
5	Reasons for decision: <p>This Mount Batten Pontoon replacement is part of the Plymouth Sound National Marine Park (PSNMP) project and seeks to deliver a more accessible pontoon to enable the Centre to provide better access to the activities for those with additional needs and ensuring more and more diverse people can engage with the heritage of the Sound.</p> <p>The pontoon will also deliver a new permanent home for the Mount Batten Water Ferry in a more sustainable location and to continue to operate a vital transport link to the Mount Batten Peninsula and repair a PCC asset in terms of the bridgehead where the pontoon operates from.</p> <p>The project seeks the additional funding to deliver a pontoon fit for purpose in the environment based on the extensive investigations works completed, as well as the additional requirements of the Mount Batten Water Ferry and the repair of the bridgehead.</p>
6	Alternative options considered and rejected: <ol style="list-style-type: none"> 1. Do Nothing - Would result in delivery of a minimal pontoon that would deliver some of the needs of the Centre, but would not deliver the Ferry requirements, thus resulting in termination of the Ferry service to the Mount Batten peninsula. Without the bridgehead repairs that new bridge would be fitted to a structure that is not fit for purpose and would likely fail in the near future thus making the pontoon unusable for all users which would likely result in the Mount Batten Centre failing as a going concern. 2. Delivery of the Ferry requirements and bridgehead repairs but not deliver the commercial berths that would provide an ongoing revenue stream to mitigate the maintenance cost of the new pontoon. This

option would require ongoing revenue cost to maintain an operate the pontoon with not mitigation to of set it.				
7 Financial implications and risks: Total of pontoon project (including commercial berths to generate a revenue income) is £4.2m. PSNMP budget is £1.7m, FM committed £400k, leaving £2.1m budget pressure to be addressed through corporate borrowing. Cost increase due to incorporate water taxi requirements (£650k), bridgehead repairs (300k), eight commercial berths (£730k), plus additional cost as a result of site investigations that have confirmed rock increasing the piling and construction costs for the project. Risks; <ul style="list-style-type: none">• Project costs could increase further due to unknowns at this stage. However included in this proposal is appropriate contingency allowances to mitigate any further costs increase. The pontoon project will be an NEC contract that means only approved compensation events could impact the cost, due to the extensive investigation works already completed and provided at the point of tender therefore would have been allowed for by the contractor.• That the estimated income from commercial berths and pontoon is not achieved either due to lack of dedicated focus to drive income, or due to other external pressures that limit the market available. Clearly assigning the responsibility to drive and secure income from the pontoon would need to be assigned to a suitably qualified resource by the owner of the pontoon. This resource would also need to identify ways to mitigate market pressures should the arise.• Marine works for the pontoon are impacted and delayed by winter storms. Contingency allowance made to cover downtime for crew and jack-up barge, as well as other unknown factors.				
8 Legal Implications (AC): A compliant procurement has been undertaken for the works. Once the ownership of the pontoon has been determined by the Strategic Director for Growth a decision regarding ownership of the pontoon will be published.				
9	Is the decision a Key Decision? (please contact Democratic Support for further advice)	Yes	No	Per the Constitution, a key decision is one which:
			x	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total
			x	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1 million annually
			x	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.
	If yes, date of publication of the notice in the Forward Plan of Key Decisions			
10	Please specify how this decision is linked to the Council’s corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:	The PSNMP programme is key strategic priority for the Council and links to the following Corporate Plan priorities: <ul style="list-style-type: none">• Make Plymouth a great place to grow up and grow old. This project seeks to enhance both Plymouth as a city and its citizens wellbeing by reconnecting people to the ocean and		

		<p>all the wellbeing benefits that brings. Being the home of the UK's first National Marine Park brings huge prestige to the city that raises the profile of the city national and internationally all of which encourages more investment and visitors to the city.</p> <ul style="list-style-type: none"> • Green Investment, Jobs, Skills and Better Education are delivered within the PSNMP project. Investment in local business, Inspire element will focus on Skills development and schools programme that seeks to engage with every primary school in Plymouth either annual for four years or for one full school year. In addition the delivery of a new more sustainable location for the Mount Batten Water Ferry to land is part of Green Investment in sustainable transport routes. • Spending Money Wisely is a clear aim of the project. All ideas for the programme were tested in the development phase and capital plans were developed to RIBA 3 to ensure only the essential items were included and this was done through many rounds of review and value engineering to develop the solutions that represent the best value of money. <p>The Mount Batten Centre through its activities which require the more accessible pontoon are an essential delivery partner to achieving the aim of the PSNMP project.</p>		
I I	Please specify any direct environmental implications of the decision (carbon impact)	The environmental implications for the PSNMP programme including the Mount Batten pontoon were identified and considered as part of the original business case in approved by the Cabinet in Feb 2024. This decision does not change the environmental implications already considered.		
Urgent decisions				
I a	Is the decision urgent and to be implemented immediately in the interests of the Council or the public? Please type an X into the relevant box	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	x	(If no, go to section I3a)
I b	Reason for urgency:			
I c	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
		Yes	X	

I 3 a	Are any other Cabinet members' portfolios affected by the decision?	No		
I 3 b	Which other Cabinet member's portfolio is affected by the decision?	Councillor Tudor Evans OBE (Leader) Councillor Sue Dann (Cabinet member for Customer Experience, Sport, Leisure and HR and OD) Councillor Chris Penberthy (Cabinet member for Housing, Cooperative Development and Communities)		
I 3 c	Date Cabinet member consulted	25 September 2025		
I 4	Has any Cabinet member declared a conflict of interest in relation to the decision?	Yes	X	Discussed with Monitoring Officer, agreed approach for Councillor Laing (Deputy Leader) to take decision. Councillor Evans OBE (Leader has delegated this responsibility to Cllr Laing on 25/09/2025.
		No		
I 5	Which Corporate Management Team member has been consulted?	Name	Glenn Caplin-Grey	
		Job title	Strategic Director for Growth	
		Date consulted	14/08/2025	

Sign-off


I 6	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)	JS30 25/26
		Finance (mandatory)	ITG.25.26.064
		Legal (mandatory)	LS/00001312/1/AC/26/9/25.
		Procurement (if applicable)	SN/PS/798/ED/0925
		Corporate property (decisions involving Council owned land or facilities) (if applicable)	FM/250926/004
		Human Resources (if applicable)	N/A

Appendices

I 7	Ref.	Title of appendix
	A	Briefing report for publication - <i>PSNMP MB Pontoon budget uplift - Briefing Report v2</i>
	B	Equalities Impact Assessment - <i>250804-PSNMP-MB-EqIA-Mount-Batten-PONTOON</i>
	C	Climate Impact Assessment - <i>Mount Batten Pontoon_MOU-3478-25_19-05-2025_FINAL (1)</i>
	D	

Confidential/exempt information

	Yes	x	
--	------------	----------	--

I 8 a	Do you need to include any confidential/exempt information? Please type an X into the relevant box	No						
		Exemption Paragraph Number						
		1	2	3	4	5	6	7
I 8 b	Confidential/exempt briefing report title: 2025 Capital Business Case - PSNMP MB Pontoon_v6.4 (Approved)			X				
Background Papers								
I 9	Please list all unpublished, background papers relevant to the decision in the table below. Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.							
Title of background paper(s)		Exemption Paragraph Number						
		1	2	3	4	5	6	7
Cabinet Member Signature								
2 0	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.							
Signature				Date of decision		26/09/25		
Print Name		Councillor Jemima Laing (Deputy Leader)						

This page is intentionally left blank

Mount Batten Pontoon Budget Uplift

Briefing Paper Part I



1. EXECUTIVE SUMMARY

2. The Mount Batten pontoon project has expanded from the original concept (meeting the needs to the Mount Batten Water Sports and Activity Centre) to include provision for the public Mount Batten Ferry and repairs to the bridgehead or sea wall.
3. The Mount Batten Centre pontoon and bridgehead works meet the following requirements:
 - 3.1 Replacement of the Mount Batten Water and Activity Centre pontoon as part of the National Lottery Heritage Funded Plymouth Sound National Marine Park (PSNMP)
4. Replacement of the Mount Batten Ferry landing stage. The previous landing stage and bridge were condemned and operations moved to the Mount Batten Centre existing pontoon. The new facility will meet both requirements.
 - 4.1.1. Bridgehead repairs. The bridgehead that supports the bridge to the Mount Batten pontoon has been identified as needing repair and strengthening works, at the request of FM these works have been incorporated into this project.
- 1.3 The three elements were incorporated within the tender for the pontoon replacement works.
- 1.4 The total pontoon project is £4,221,963. The PSNMP budget made up of The National Lottery Heritage Fund and UK government grants is £1.7m leaving a £2.5m budget uplift. The uplift is required to meet the new requirements of the project (bridgehead repairs and public ferry), and to meet increased construction costs identified due to results of surveys and seabed investigations. The uplift has been met from Facilities Management; Corporate Estate Fund, Health and Safety Fund and Corporate Borrowing.

5. PROJECT PREPARATION AND BUSINESS CASE

- 5.1. This budget uplift covers the replacement of the Mount Batten Water Sports and Activity Centre pontoon, provision for the Mount Batten ferry to operate and essential repairs to the bridgehead where the connecting bridge comes ashore. The works compliment the refurbishment of the Mount Batten Water Sports and Activity Centre, public realm and Mount Batten Tower (amenities) already underway.
- 5.2. The pontoon project scope was originally to replace the pontoon only for a wider more accessible pontoon deck to enable the Mount Batten Centre to provide better access to the activities for those with additional needs and ensuring more people could engage with the heritage of Plymouth Sound as part of the Plymouth Sound National Marine Park.
- 5.3. The project appointed technical advisors (Cattewater Harbour Commissioners) to support the development of the project. With their guidance, extensive investigations works were undertaken to help de-risk the project; these include wave report, UXO investigations and substantial seabed investigation including rock testing and boreholes. The results of these investigations were that the seabed was identified as limestone rock rather than mud, which has resulted in piling requirement to rock socket all piles, which is the most expensive type of piling. The investigations also identified wave heights could be higher than expected in extreme weather conditions, even with the shelter position of the pontoon and therefore this has resulted in the need for a heavier duty pontoon design.

- 5.4.** Within the design process options for additional commercial berths (8 in total) have been considered to provide ongoing revenue income to offset the maintenance and operational cost associated with the pontoon.
- 5.5.** In Jan 2024 following the failure of the PCC Mount Batten Landing Stage Bridge, the PSNMP project team was expanded to cover the Ferry operation. The project objective was now to provide a single pontoon landing stage to the Mount Batten peninsula.
- 5.6.** This option was then presented to the Mount Batten Centre Board who also agreed in principle to the proposal subject to design and final agreements. The MBP project team have been developing the project since this time based on these decisions, this has resulted in a wider scope for the investigation works thus creating additional cost to the project to date.
- 5.7.** In April 2024 the project team were advised by our technical advisors Cattewater Harbour Commissioners (CHC) that during investigations cracks had been identified in the bridgehead. The bridgehead forms part of the PCC estate. Facilities Management contractors carried out extensive investigations. With agreement from Facilities Management and in order to coordinate all works and prevent project delay the bridgehead was included in the overall project and put to competitive tender.
- 5.8.** The overall project was the subject of open competitive tender covering construction, professional fees, surveys and contingency.
- 5.9.** The results of the tender process and budget were the subject of a Business Case approved by CPOG (14th August) and CPB (17th September 2025).

The following relates to exempt or confidential matters (Para(s) 3 of Part 1, Schedule 12A of the Local Govt Act 1972). Any breach of confidentiality could prejudice the Council/person/body concerned & might amount to a breach of the councillors /employees codes of conduct.

Document is Restricted

This page is intentionally left blank

EQUALITY IMPACT ASSESSMENT – MOUNT BATTEN PONTOON – PLYMOUTH
SOUND NATIONAL MARINE PARK

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): This is the person completing the EIA template.	Jessica Jarvis	Department and service:	Economic Development, Place	Date of assessment:	01/08/2025
Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Kathryn Deeney	Signature:		Approval date:	4 th August

Overview:

The National Lottery Heritage Fund (NLHF) Round 2 bid was successful, and the full grant applied for was approved by the NLHF Board in Dec 2023. The focus of the project is to support underserved communities in Plymouth to have increased access to the sea and coast through a suite of both capital and revenue interventions.

The delivery stage of the project will catalyse work to deliver the NMP vision over a 5 year period, starting in January 2024 following the discharging of the grant conditions and acceptance of the grant funding.

The project is an integrated, transformative collaborative programme of work to enable a new relationship between the city and sea, which benefits people and nature. The aim of the different areas of the project is to work holistically together to bring the NMP to life. The project includes.

- An inclusive Activity Plan, which will provide different communities with opportunities to engage with the Park, discover and learn more about the NMP and support activities to help enhance and care for the Park.
- Sensitive Capital enhancements to key hubs along the waterfront opening up new places and spaces for communities to enjoy and engage with the NMP.
- Pioneering nature restoration initiatives.
- An innovative Digital Park to ensure the heritage beneath the waves is visible, accessible and inspirational.

- An Interpretation Plan which will highlight the past, present and future, co-designed with our communities and reaching into the heart of our city.

This cohesive programme has been designed to enable a new sustainable relationship with the sea. By removing identified barriers to access, it will enable communities across the city to engage with the NMP in a manner that is relevant and beneficial to them. There will be a focus on working alongside communities that currently have little or no engagement with the NMP. This will deliver significant benefits and ensure that the NMP is inclusive and welcome for all.

The Capital works are a huge enabler to encourage this sustainable relationship with the sea by providing new and engaging access points to the Ocean.

At Mount Batten the capital works include the largescale restoration of the Mountbatten Watersports and Activity Centre (ground floor) and the redesign of the public spaces with increased access to the Mount Batten Tower scheduled monument. The Mount Batten Watersports and Activity Centre ground floor works include new accessible changing facilities, reimagined café and outdoor seating area. Separate but complimentary to this current work, the centre’s pontoon will be replaced to allow new facilities and public access.

Engagement in Project Design

To help inform the project design and delivery and, ensure that equality diversity and inclusion is at the center of our project, we have engaged with local community organisations including ethnic minorities, disability groups, the LGBTQ+ community, and organisations that work with neurodivergent individuals.

During the test and trial phase we have spoken directly to 10,000 people, inspired over 7,000 school children, reached millions through our digital engagement and motivated over 200 people to become volunteers. The project team and partners have worked with our communities to provide genuine engagement and a deep understanding of how this project can drive a very positive transformation for people, the environment and Plymouth.

Over the past 2 years the project has ensured inclusive engagement has enabled communities to shape the project that will be submitted at the next stage, as well as ensuring people had the opportunity to interact with the NMP in new ways.

The Development Phase research and consultation programme clearly established how local people, communities and businesses perceive the area and its heritage. The majority of feeling was overwhelmingly positive, consistent with data from the 2022 City Survey which recorded that 97.8% of respondents said that Plymouth Sound was either Important or Very Important to them. The findings from this research has led to the identification of a set of barriers to engagement which are mitigated by a programme of activities as we have set out in the table below.

Based on desk research, consultation and pilot projects, the priority audiences for this project, i.e. communities that feel disconnected, are confirmed as:

	<ul style="list-style-type: none">Families with school-age childrenAdults (55+) from lower income neighborhoodsPlymouth catchment schools (primary, secondary and SEND)Students: Higher and Further educationPeople with health conditions or impairments • People from ethnic minority backgrounds <p>The research underlined the importance of co-design and co-development with community groups and communities of interest. Co-development is embedded in the Activity Plan methodology, aligned to each priority audience, with input from specialist sector charity.</p> <p>The full Business Case and an Executive Decision to accept the funding and add it to the capital programme was presented to cabinet 12 February and was approved (minute reference 103).</p>
Decision made:	<p>Mount Batten Pontoon</p> <ol style="list-style-type: none">Approves the Business CaseAllocates £2,093,698 for the project into the Capital Programme funded by Corporate Borrowing.Confirms and allocates £264,000 from Improvements to Corporate Estate Fund to the Capital Programme.Confirms and allocates £136,000 from Health and Safety Fund to the Capital Programme.Delegates the award of the pontoon works contract to Service Director for Economic DevelopmentDelegates the decision of the ownership of the pontoon to the Strategic Director for Growth in consultation with the Mount Batten Board.

<p>Potential external impacts:</p> <p>Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?</p>	Yes		No	X
<p>Potential internal impacts:</p> <p>Does the proposal have the potential to negatively impact Plymouth City Council employees?</p>	Yes		No	X

Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required, and you must complete section three)	Yes		No	X
---	-----	--	----	---

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	It is unlikely the programme will have any negative impacts. However, we have conducted the full EIA assessment in this case to ensure that all members of our community are afforded equality of access to the programme.
--	--

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g., data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department

Age	<p>Plymouth</p> <ul style="list-style-type: none">• 16.4 per cent of people in Plymouth are children aged under 15.• 65.1 per cent are adults aged 15 to 64.• 18.5 percent are adults aged 65 and over.• 2.4 percent of the resident population are 85 and over. <p>South West</p> <ul style="list-style-type: none">• 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64.• 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none">• 17.4 per cent of people are aged 0 to 14.	<p>No adverse impact is anticipated from the Mount Batten programme however:</p> <p>Specialist teams such as PCC Youth Services are unable to deliver youth sessions on the shoreline as they lack knowledge about where to go safely, marine science and benefits for young people.</p> <p>A common denominator that restricts engagement for all priority audiences is low income and therefore the need for free activities and free or low-cost travel, and /or events that are walking</p>	<p>Close working with PCC youth workers will build confidence in the youth team and offer benefits to young people of learning from a Ranger.</p> <p>All engagement will be taken place with the PSNMP team (Either the PCC/Street Services Rangers or Mount Batten themselves in line with their collaboration agreement)</p> <p>Central works must integrate an entirely accessible route that</p>	<p>Our Marine citizenship pathway sets out a clear 3 step programme:</p> <p>Step 1 – Experience and Learn</p> <p>Step 2 – Discover and Learn</p> <p>Step 3 – Connect and Act</p> <p>PSNMP will begin targeted work with younger people on Step 1 in 2024 and with over 55s from low income neighborhoods in 2025.</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by</p>
-----	---	---	--	--

	<ul style="list-style-type: none"> 64.2 per cent of people are aged 15 to 64. 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p> <p>Respondents aged '16-24' were <u>significantly</u> less likely to agree Plymouth's Sound is special to the city (71%) compared with those aged '25+' (89%-97%). (City Survey 2022)</p>	<p>distance from home this is particularly relevant to young people who often cite the cost of public transport as a barrier.</p> <p>Restrictions for the 20% of Plymouth residents who are 60+ years of age risk restriction due to their physical ability to access the works.</p> <p>Very low, or non-attainment in age related tests and formal qualifications is a barrier to transition through school and in job or career.</p> <p>Teaching and learning support for Science Technology, Engineering and Maths (STEM) subjects was in demand by teachers.</p>	<p>allows all to engage with Mount Batten café, when they are unable to engage in physical activities, allowing all age engagement to Mount Batten.</p> <p>Tailored coaching for pupils and young people supports a city-wide approach to unlocking potential for employment in the blue STEM sector for marginalised young people.</p> <p>The addition of a pontoon will enhance water access and offer a more stable, safer means of boarding and disembarking from vessels, particularly supporting older adults and youth groups who may have reduced mobility or coordination.</p>	PSNMP and Plymouth City Council.
--	---	--	---	----------------------------------

Care experienced individuals. (Note that as per the Independent Review of	It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of	No adverse impacts are anticipated from the Mount Batten programme, however: A common denominator that restricts engagement for all priority audiences is low	Lack of transport and access, together with the cost of activities and cultural differences are all significant barriers that the project aims to	The majority of people with identifiable care experience needs will be younger people. PSNMP will begin targeted work
---	--	--	---	---

Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).	<p>those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>	<p>income and therefore the need for free activities and free or low-cost travel, and /or events that are walking distance from home. These factors are likely to be particularly relevant to Care Experienced individuals.</p> <p>Care experienced individuals are particularly likely to suffer from poor educational attainment and very low, or non-attainment in age related tests and formal qualifications is a barrier to transition through school and in job or career.</p>	<p>overcome and will be a focus for the Activity Plan in collaboration with MBC, a significant budget has been earmarked to support low income groups to overcome these barriers.</p> <p>Further to this the Activity Plan will involve specific engagement to key groups, this will include both communities in and providing care.</p> <p>The project has created 4 supported, paid internship placements every year for four years of the project, and these will be targeting people from our target audiences from year two until year four. We will also consider how these can support internships can support Care Experienced Individuals through the role profiles we develop for them.</p> <p>Mount Batten should be involved in taking on some of these</p>	<p>with younger people on Step 1 in 2024.</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by PSNMP and Plymouth City Council.</p>
--	---	---	---	---

			internships/volunteers to	
--	--	--	---------------------------	--

			<p>promote blue career pathways.</p> <p>The addition of a pontoon will directly support inclusive participation by enabling safe, accessible entry to the water for young people who may lack confidence or have not previously had access to structured water-based experiences. It removes physical and psychological barriers to engaging in marine learning and activities, fostering a sense of belonging and opportunity.</p>	
--	--	--	---	--

Disability	<p>9.4 per cent of residents in Plymouth have their activities limited ‘a lot’ because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited ‘a little’ because of a physical or mental health problem (2021 Census)</p> <p>Respondents with ‘no limiting disability or health problems’ (92%) were <u>significantly</u> more likely to agree with the statement Plymouth’s Sound is special to the city than those who were ‘limited a lot’ (87%).</p>	<p>No adverse impacts are anticipated from the Mount Batten programme, however:</p> <p>There are significant barriers to engagement for people with health conditions and impairments.</p> <p>The capital programme envisages works to a number of buildings on the waterfront which have historically</p>	<p>Consultation during and after the works should take place with a wide range of groups demonstrating that responses must be specific and targeted.</p> <p>Plymouth residents receiving treatment for a mental health illness, and many more who will not be formally diagnosed</p>	<p>PSNMP will begin targeted work with people with a health impairment on Step 1 in 2025</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by PSNMP and Plymouth City Council.</p>
------------	--	--	--	--

		<p>suffered from poor physical access.</p>	<p>can utilise Plymouth’s proximity to the ocean and the development of PSNMP for blue social prescribing used within their mental health services</p> <p>Works taken place must focus on improving access in the context of marine heritage buildings (The Mount Batten Tower) where the natural topography is a limiting factor.</p> <p>Reasonable steps must be taken to improve access/allow those physically unable to access The Tower to still feel engaged and connected.</p> <p>All works must also consider the disabilities that are not obvious to the eye such as sight and hearing impairments.</p> <p>Works must involve a hearing loop and accessible access where required for those that need extra support</p>	
--	--	--	---	--

			and/or guide dog guidance.	
--	--	--	----------------------------	--

			<p>Staff will be appropriately trained in how to approach and support the public who require extra support without making them feel disconnected or an inconvenience.</p> <p>The inclusion of a new pontoon will enable level access to boats and water-based activities, reducing physical barriers for wheelchair users, those with mobility impairments, and people recovering from injury.</p>	
--	--	--	--	--

Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans woman (2021 Census).	No adverse impacts anticipated. However: National and local research highlights that trans and nonbinary individuals often experience discomfort, discrimination, or exclusion in gendered changing or activity spaces, particularly in physically exposed environments such as swimming or outdoor water access.	Training for staff and activity leaders will include gender identity awareness to ensure respectful and supportive environments during pontoon-based sessions. The Activity Plan will review how water-based sessions, including those using the pontoon, can be further adapted to support inclusion of trans and non-binary participants, including	Ongoing engagement with LGBTQ+ communities as part of wider participation strategy.
---------------------	--	---	---	---

			privacy and dignity considerations.	
Marriage and civil partnership	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnership of the same sex. 0.06 per cent of residents are in a civil partnership with the opposite sex (2021 Census).</p>	No adverse impacts anticipated	Not applicable	Not applicable
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impacts anticipated	Not applicable	Not applicable

Race	<p>In 2021, 94.9 per cent of Plymouth’s population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p> <p>Those identifying themselves as ‘White’ were <u>significantly</u> more likely to agree Plymouth Sound is special to the city (92%) compared</p>	<p>No adverse impacts are anticipated from the programme, however:</p> <p>English language proficiency is a barrier for some people from ethnic minority backgrounds.</p> <p>Significant cultural barriers exist that prevent some people from ethnic minority backgrounds participating in mainstream activities.</p> <p>Many people perceive swimming and water-based sports as dangerous due to lack of open water swimming</p>	<p>Community specific organisations are trusted and will create a gateway to engagement.</p> <p>Co-development of programmes will help mitigate cultural barriers and orientate people to the range of activities available.</p> <p>The PSNMP has developed a collaboration with Hope Plymouth, a group consisting mainly of African and Middle Eastern men, women and</p>	<p>PSNMP will begin targeted work with people from ethnic minority backgrounds on Step 1 at the latest in 2026.</p> <p>In the interim we will build community capacity to engage through our volunteering and ambassador programme.</p> <p>Pontoon installation scheduled for 2025/26. Sessions co-developed with groups like Hope Plymouth will trial pontoon use in 2025–26. Led by PSNMP,</p>
------	--	--	--	--

	with those identifying themselves as ‘Any other ethnic group’ (85%).	confidence and this is especially true for some ethnic minority communities.	<p>children who are primarily refugees awaiting decisions on asylum claims.</p> <p>The Rangers have been co-designing activities as a number of these men particularly have trauma associated with the water and therefore any activities that are suggested need to be carefully considered.</p> <p>The addition of a pontoon provides a stable, gradual, and visibly safe access point to the water, which is less intimidating for people unfamiliar with open water environments. It reduces anxiety around unpredictable or unclear entry points and helps address trauma-related concerns.</p>	with input from community facilitators and accessibility/inclusion advisors.
--	--	--	--	--

Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totaled less than 1 per cent (2021 Census).</p>	<p>No adverse impacts are anticipated from the Mount Batten programme, however:</p> <p>Significant cultural barriers exist that prevent some people from minority faith backgrounds participating in</p>	<p>Co-development of programmes will help mitigate cultural barriers and orientate people to the range of activities available.</p>	<p>The evaluation element of the programme will continue to assess the success of our engagement programme, and should other faith related issues be identified we can ensure that these are addressed in</p>
		<p>mainstream activities, e.g. Muslim women are likely to uncomfortable with mixed swimming sessions.</p>	<p>We are redeveloping the changing facilities at Mount Batten to provide a changing space with 2 door separation between men and women's changing areas.</p>	<p>the activity plan for year four in 2027.</p>
Sex	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	<p>Women are underrepresented in STEM based occupational groups.</p>	<p>We will ensure that STEM provision is inclusive and promoted to young women and girls.</p>	<p>Addressing the shortfall in women is STEM occupations within the programme context is aligned with our work with children and young people.</p> <p>PSNMP will begin targeted work with younger people on Step 1 in 2024.</p>

		importance of Plymouth Sound.		
Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census). Respondents identifying as 'Heterosexual / Straight' (92%) were <u>significantly</u> more likely to agree with the statement Plymouth Sound is special to the city than those who identified as Bisexual / Gay / Lesbian (86%).	No adverse impacts are anticipated from the programme, however: The engagement programme to date has included work with LGBTQ+ groups but as yet no specific barriers related to this protected characteristic have been identified that would explain the disparity between LGBTQ+ groups and the wider community in terms of their views about the	Whilst LGBTQ+ groups are not an identified target group we will continue to engage constructively with them as part of wider ongoing engagement programme.	The evaluation element of the programme will continue to assess the success of our engagement programme and should this continue be the case we would take additional steps to enable to engage with this audience.

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
--------------	--------------	--------------------	--------------------------------------

	<p>No adverse impacts to human rights are anticipated.</p> <p>Families with school-age children are recognised as a priority target group, however there is nothing in the delivery plan that would give rise to an Article 8 (rights to respect for family life) concern since the delivery programme will seek to encourage rather than compel participation.</p>	Not applicable	<p>2024-2029</p> <p>Place</p>
--	---	----------------	-------------------------------

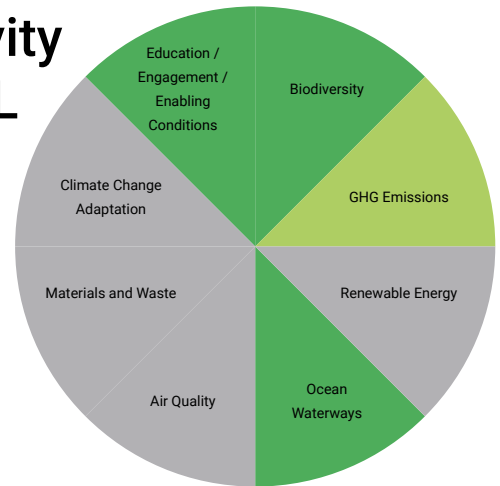
SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
<p>Celebrate diversity and ensure that Plymouth is a welcoming city.</p>	<p>No adverse impacts are anticipated. The Mount Batten project is centered around ensuring that all communities feel welcome and supported to access the sea and the coast through the Centre with a range of activities and access points. The Activity Plan sets out in detail how this will be delivered.</p>	<p>In 2027 our engagement programme will be evaluation led so that any communities or interest or geography who have not been fully engaged will be recognised and included as target communities for the fourth year of the programme.</p>	<p>2024-2029</p> <p>Place</p>
	<p>An engagement plan will help to ensure that both communities of interest and geography are engaged in the project.</p>		

Pay equality for women, and staff with disabilities in our workforce.	Not applicable Post hosted by partner organisations will be subject to their own policies and procedures.	Not applicable	2024-2029
Supporting our workforce through the implementation of Our People Strategy 2020 – 2024	Staff and volunteers' skills will be developed around Equality, Diversity and Inclusion to be able to deliver the range of activities in the activity programme when working with priority audiences.	Not applicable	2024-2029
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.	Many of the community organisations we will be co-developing our programme with are designated safe reporting centres. We will respond positively to any reports we receive through these, or other routes, that relate to our staff, service users or programme delivery.	Not applicable	
Plymouth is a city where people from different backgrounds get along well.	No adverse impacts are anticipated. The Activity Plan will offer opportunities for all and will tailor activities and events to meet the needs of all our communities. An engagement plan will help to ensure that both communities of interest and geography are engaged in the project.	Not applicable	2024-2029

This page is intentionally left blank

Mount Batten Water Sports and Activity Centre and Mountbatten Tower FINAL



Assessment ID: MOU609

Assessment Author: Jon Parr

Project Summary:

The project is the refurbishment and restoration of a key access point of the Plymouth Sound National Marine Park (PSNMP). The changes are being delivered to enable a new gateway to the PSNMP that will support programmes that will get more and more diverse groups of people to engage with the PSNMP, removing barriers and developing a new relationship with the sea. The Mount Batten Centre key business is providing access to the water and surrounds. The envisaged works promote water activities, access to nature.

Summary of Assessment:

The project is the refurbishment and restoration of an existing building rather than the a new less sustainable build. The changes are part of the development of the Plymouth Sound National Marine Park (PSNMP) providing one of 4 Gateways to Plymouth Sound and the rich biodiversity there. The PSNMP supports

programmes to engage diverse groups to engage with the park

removing barriers and developing a new relationship with the sea. The marine citizenship programme of activity that runs alongside the built asset changes aims to deliver benefits to communities but also foster positive environmental behaviours.

Biodiversity Score: 4

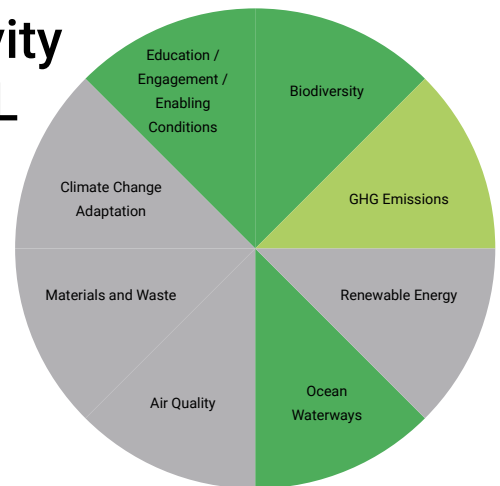
Biodiversity Score Justification: The main part of the project is internal refurbishment and changes to the space to allow greater accessibility. However alongside the works are substantial changes to the public realm, a designed planting scheme and improvements to the Mountbatten Tower path. The planting and management looks to enhance biodiversity throughout

Biodiversity Score Mitigate: Yes

Biodiversity Revised Score: 5

Biodiversity Revised Score Justification: Part of wider Plymouth Sound National Marine Park long term enhancement of biodiversity. Future works on Mountbatten Peninsula will consider biodiversity gain alongside intertidal works and engagement projects

Mount Batten Water Sports and Activity Centre and Mountbatten Tower FINAL



GHG Emissions Score: 3

GHG Emissions Score Justification: The works are construction around the refurbishment of existing buildings and car parking. There will be limited soil disturbance (car parking) and temporary increase in traffic. The scheme involves new planting and tree planting. Gas boilers remain but a total of three air source heat pumps will be included as part of the new works (heating cooling condensers for café (x2nr) and reception (x1nr))

GHG Emissions Score Mitigate: Yes

GHG Emissions Revised Score: 4

GHG Emissions Revised Score Justification: Planting scheme (including tree planting) Three air source heat pumps included as part of the new works (heating cooling condensers for café (x2nr) and reception (x1nr)), reduced use of gas boiler to heat radiators and lead to lower emissions

Renewable Energy Score: 3

Renewable Energy Score Justification: The works are refurbishment and do not include energy use changes to the centre

Renewable Energy Score Mitigate: No

Ocean and Waterways Score: 3

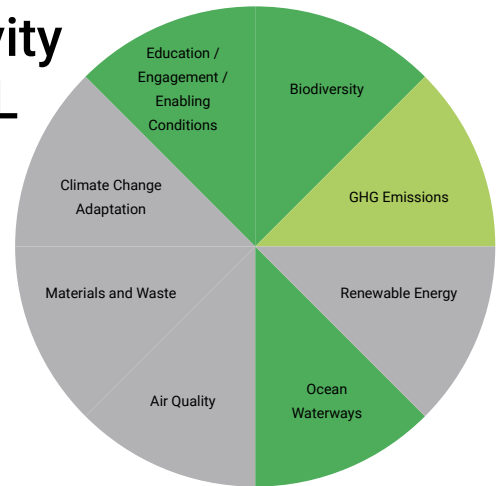
Ocean and Waterways Score Justification: The works are the refurbishment of existing facilities. The same number of showers and toilets are included as present. There may be additional impacts from the extension of the cafe function but minimal impact

Ocean and Waterways Score Mitigate: Yes

Ocean and Waterways Revised Score: 5

Ocean and Waterways Revised Score Justification: A Planning pre-commencement condition requires a Habitat Regulation Assessment (HRA) strategic mitigation plan to secure the delivery

Mount Batten Water Sports and Activity Centre and Mountbatten Tower FINAL



of appropriate measures required to address likely impacts on the Plymouth Sound & Tamar Estuaries Marine protected Area that have been identified in the HRA.

Air Quality Score: 3

Air Quality Score Justification: Some construction traffic impact. Project includes planting scheme in the public realm with limited positive impact. Successful contractor will agree traffic management plan to minimise impact

Air Quality Score Mitigate: No

Materials and Waste Score: 3

Materials and Waste Score Justification: Tender process requires construction materials have been carefully selected for long term robustness and durability to reduce life cycle carbon footprint whilst having regard to the need to follow best practice

Materials and Waste Score Mitigate: No

Climate Change Adaptation Score: 3

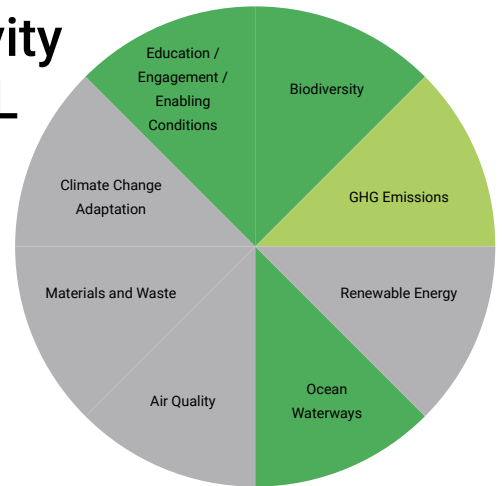
Climate Change Adaptation Score Justification: The Mountbatten Water Sports and Activity Centre is not at risk of flooding. The work of the centre and the PSNMP is to highlight climate change, adaptation and mitigation.

Climate Change Adaptation Score Mitigate: No

Education / Engagement / Enabling Conditions Score: 4

Education / Engagement / Enabling Conditions Score Justification: The Mountbatten Watersports and Activity Centre is one of 4 Gateways to Plymouth Sound National Marine Park. They are directly involved in the promotion and accessibility to the marine environment. A key message is to engage marine citizens and understand our impact on the marine environment

Mount Batten Water Sports and Activity Centre and Mountbatten Tower FINAL



and its impact on us.

Education / Engagement / Enabling Conditions Score Mitigate: Yes

Education / Engagement / Enabling Conditions Revised Score: 5

Education / Engagement / Enabling Conditions Revised Score Justification: The wider project proposes an activity programme that will work with the restored and repurposed areas in the building to help enable a change in the relationship between people and the PSNMP. This will be a sustainable change that will benefit communities and nature.

Wheel Key

- Long lasting or severe negative impact
- Short term or limited negative impact
- No impact or neutral impact
- Short term or limited positive impact
- Long lasting or extensive positive impact

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER


Executive Decision Reference Number – HCD02 25/26

Decision	
1	Title of decision: Independent Living Policy Review 2025
2	Decision maker: Councillor Chris Penberthy - Cabinet Member for Housing, Cooperative Development and Communities
3	Report author and contact details: Dave Ryland – Head of Housing Standards Dave.ryland@plymouth.gov.uk Tel: 01752304823 / Community Connections Service Director Matt Garrett, matthew.garrett@plymouth.gov.uk Tel: 01752306733
4	Decision to be taken: I. To approve the Independent Living Assistance Policy Review 2025.
5	Reasons for decision: It is important to review the Independent Living Policy now to ensure continued compliance with statutory obligations and to reflect the evolving policy landscape, including the integration ambitions of the Better Care Fund and the care needs recognised under the Care Act 2014. Rising demand, increased adaptation costs, and a growing emphasis on flexibility and local responsiveness further underscore the need for an updated, robust policy that supports effective delivery and cross-sector collaboration. As part of the Policy review, public and professional consultation has been conducted receiving strong and constructive engagement, shaping local policy. Respondents expressed clear support for proposed amendments to the Independent Living Assistance (ILA) Policy, including the introduction of low-interest loans, continued availability of discretionary Moving On Grants, and access to a marketplace for privately funded works. Innovative delivery methods, such as modular construction, ramps, and wall panelling, were welcomed, alongside practical adjustments like omitting hardstanding's, where alternative access solutions (e.g. platform lifts or ramps) are viable. The consultation also revealed enthusiastic backing for the council's commitment to achieving Net Zero and for encouraging contractors to employ apprentices, reflecting a shared vision for sustainable development and inclusive growth.
6	Alternative options considered and rejected: Under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002, local authorities must publish a housing assistance policy before offering support. Since 1990, councils have been legally required to provide Disabled Facilities Grants (DFGs) to help disabled individuals adapt their homes. As such, alternative approaches to this Policy have not been considered.
7	Financial implications and risks: Revisions to the Housing Assistance Policy include an increase in the maximum discretionary assistance, for Top-Up Grant, from £20,000 to £30,000. This adjustment reflects global price inflation and aims to reduce financial barriers wherever possible for eligible residents. Additionally, the fee for 'Nil Grant'

	<p>applications has been raised from 1% (INCIC) + 1% (PCC) to 1% (INCIC) + 2.5% (PCC), with 1% attributed to the infrastructure and systems used for tendering works (payable to INCIC), plus 2.5% assigned to the staffing resource required to manage project delivery from design through to completion (payable to PCC).</p> <p>Furthermore, means testing will now be applied to parents or legal guardians in children's cases where the grant amount exceeds the statutory maximum, for the discretionary Top-Up Grant amount only. This change is intended to ensure equitable access while maintaining fiscal responsibility within the broader funding framework.</p>		
8	<p>Legal Implications: (For completion by Legal Officers)</p> <p>No legal implications.</p>		
9	<p>Is the decision a Key Decision? (please contact Democratic Support for further advice)</p> <p>Please type an X into the relevant boxes</p>	<p>Yes</p> <p>No</p>	<p>Per the Constitution, a key decision is one which:</p> <p>in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total</p> <p>in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1million annually</p> <p>is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.</p>
	<p>If yes, date of publication of the notice in the Forward Plan of Key Decisions</p>	N/A	
10	<p>Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:</p>	<p>The provision of Disabled Facilities Grants (DFGs) directly supports the corporate plan to "keeping children, adults and communities safe" by promoting independence, reducing health and social inequalities, and enabling individuals to live with dignity and respect. Major adaptations funded through DFGs allow people to remain safely in their homes, helping to mitigate rising costs in health and social care and reducing risks for disabled individuals, their families, and carers.</p> <p>Keeping children, adults and communities safe.</p> <p>Focusing on prevention and early intervention.</p> <p>Spending money wisely.</p> <p>This approach aligns with the Care Act 2014, which places wellbeing at the heart of adult social care. Local authorities are required to consider the suitability of living accommodation as part of their duty to promote wellbeing. Major adaptations serve as a preventative measure, enhancing quality of life and enabling individuals to live independently for as long as possible.</p>	
11	<p>Please specify any direct environmental implications of the decision (carbon impact)</p>	<p>No direct implications as a result of this decision.</p>	

Urgent decisions				
I2a	Is the decision urgent and to be implemented immediately in the interests of the Council or the public? Please type an X into the relevant box	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	X	(If no, go to section I3a)
I2b	Reason for urgency:			
I2c	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
I3a	Are any other Cabinet members' portfolios affected by the decision? Please type an X into the relevant box	Yes	X	
		No		(If no go to section I4)
I3b	Which other Cabinet member's portfolio is affected by the decision?	Councillor Jemima Laing - Cabinet Member for Children's Social Care, Culture & Communications Councillor Mary Aspinall - Cabinet Member for Health and Adult Social Care		
I3c	Date Cabinet member consulted	19 May 2025		
I4	Has any Cabinet member declared a conflict of interest in relation to the decision? Please type an X into the relevant box	Yes		If yes, please discuss with the Monitoring Officer
		No	X	
I5	Which Corporate Management Team member has been consulted?	Name	Gary Walbridge	
		Job title	Strategic Director Adults, Health and Communities	
		Date consulted	01 July 2025	
Sign-off				
I6		Democratic Support (mandatory)		JSI9 25/26

	Sign off codes from the relevant departments consulted:	Finance (mandatory)	ITG.25.26.058						
		Legal (mandatory)	IW 5232						
		Procurement (if applicable)	N/A						
		Corporate property (decisions involving Council owned land or facilities) (if applicable)	N/A						
		Human Resources (if applicable)	N/A						
Appendices									
17	Ref.	Title of appendix							
	A	Independent Living Assistance Policy Review 2025 Briefing							
	B	Independent Living Policy July 2025							
	C	Equalities Impact Assessment							
	D	CIA - ILAP (July 2025)							
Confidential/exempt information									
18a	Do you need to include any confidential/exempt information? Please type an X into the relevant box		Yes		If yes, prepare a second, confidential ("Part II") briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)				
			No	X					
			Exemption Paragraph Number						
			1	2	3	4	5	6	7
18b	Confidential/exempt briefing report title:								
Background Papers									
19	Please list all unpublished, background papers relevant to the decision in the table below. Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.								
Title of background paper(s)			Exemption Paragraph Number						
			1	2	3	4	5	6	7

Cabinet Member Signature							
20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.						
Signature			Date of decision	26 September 2025			
Print Name	Councillor Chris Penberthy - Cabinet Member for Housing, Cooperative Development and Communities						

This page is intentionally left blank

Independent Living Assistance Policy Review 2025 Briefing Community Connections - Major Adaptations



Introduction

Demand for Disabled Facilities Grants (DFGs) remains consistently high. With an ageing population and a growing number of residents living with multiple long-term health conditions, it is imperative that Plymouth City Council maintains a relevant and up-to-date Independent Living Assistance Policy (ILAP). This ensures we are equipped to meet current and future needs, enabling residents to live safely, independently, and with dignity in their own homes.

The ILAP has been reviewed to ensure it remains legally compliant, relevant to residents' needs, operationally effective, financially sustainable, strategically aligned, and trusted by stakeholders.

Legal and Regulatory Compliance

Ensures alignment with the latest legislation, including the Disabled Facilities Grant (DFG) Guidance 2022 and other statutory changes. Maintains legal defensibility and reduces the risk of challenges.

Relevance to Resident Need

Reflects the changing needs of residents, including demographic shifts and evolving expectations around accessibility and independence. Supports a person-centred approach to service delivery.

Operational Effectiveness

Improves clarity and consistency in decision-making by incorporating lessons learned and feedback from professionals. Enhances service delivery and reduces delays or disputes.

Financial Sustainability

Ensures efficient use of public funds by reviewing funding mechanisms and cost recovery processes. Supports better coordination with internal and external funding sources.

Strategic Alignment

Aligns the policy with broader council priorities such as the Plan for Homes 4 and the Armed Forces Covenant. Strengthens the council's ability to deliver on housing and wellbeing objectives.

Stakeholder Confidence

Demonstrates transparency and responsiveness to residents, partners, and professionals. Builds trust and reinforces the council's commitment to high standards of support.

Context

The review reflects:

The latest Disabled Facilities Grant (DFG) Guidance (2022)

- Legislative changes since the last policy review
- Feedback from resident, client and professional consultation
- Evolving best practice in supporting independent living

Consultation

As part of the Policy review, public and professional consultation has been conducted receiving strong and constructive engagement, shaping local policy. Respondents expressed clear support for proposed amendments to the Independent Living Assistance (ILA) Policy, including the introduction of low-interest loans, continued availability of discretionary Moving On Grants, and access to a marketplace for privately funded works. Innovative delivery methods, such as modular construction, ramps, and wall panelling, were welcomed, alongside practical adjustments like omitting hardstanding's, where alternative access solutions (e.g. platform lifts or ramps) are viable. The consultation also revealed enthusiastic backing for the council's commitment to achieving Net Zero and for encouraging contractors to employ apprentices, reflecting a shared vision for sustainable development and inclusive growth.

Key Policy Updates

General Updates

Policy aligned with the 2022 DFG Guidance, incorporating updated legal duties and best practice for local delivery.

Legislative references updated to reflect recent changes in housing, social care, and equality law.

Clause 2.5.4 – Landlord Consent

Clarification added regarding the progression of DFG-funded works where landlord consent

Clause 3.1.6 – DFG Maximum for Under-18s

Discretionary assistance will be considered where appropriate, with funding explored from adult/children's services, charitable sources, and client contributions.

Sections 3.2, 3.3 & 3.6 – Discretionary Assistance

Reframed discretionary clauses to focus on maximum funding limits rather than specific types of work.

Updates reflect actual usage patterns and feedback from professionals.

Clause 3.2.1.1 – Means Testing for Children

Clarification that means testing applies to parents/guardians when adaptations are for a child. Financial assessments will determine contributions above the mandatory grant.

Clause 3.7 – 'Nil Grant' Applications

Increase in the administration fee to 2.5% to cover PCC's costs for processing applications where no grant is awarded.

Clause 20.0 – Strategic Alignment

New references added to PCC's Plan for Homes 4 and the Armed Forces Covenant, reinforcing our commitment to inclusive housing support.

INDEPENDENT LIVING

DISABLED FACILITIES GRANTS (DFG)

ASSISTANCE POLICY 2025



CONTENTS

1	Introduction	3
2	Roles and Responsibilities	3
3	Types of Assistance	8
4	Prioritisation Process	12
5	Referral Process	12
6	Means Tested Contributions	14
7	Repayment and Recovery of Specialised Equipment	14
8	Applicant no longer entitled to grant	16
9	Changes in circumstances	16
10	Cases in which grant may be recalculated, withheld or repaid	17
11	Conditions as to repayment in case of compensation	17
12	Deferring Grant Payment	18
13	Grant Conditions	18
14	Disputes about the assistance provided	18
15	Fraud	19
16	Consultation	19
17	Applying Fairness	21
18	Access to information and Data Protection	21
19	Review and Revision of this policy	22
20	Appendices	
	Appendix A – Housing and Health	23
	Appendix B – Application Form	27
	Appendix C – Eligible works	40
	Appendix D – Discretionary Assistance Allocation (DAA) (Summary)	45
	Appendix E – Interim revisions to policy	46

1.0 INTRODUCTION

1.1 The purpose of the Policy is to:

- i) Assist Officers of the Council, Partner Agencies, and Citizens of Plymouth in the interpretation and implementation of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (The Order) so far as it relates to the adaptation of the homes of disabled people.
- ii) Ensure fair, equitable and consistent treatment for all disabled people who require the Council's assistance in adapting their home.

1.2 This Policy should be read in conjunction with the following documents:

Housing Grants, Construction and Regeneration Act 1996 (The Act).

Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (The Order)

1.3 The Council accepts that there may be circumstances that warrant exceptions to this Assistance Policy. The Community Connections Service Director is authorised to assess individual cases and where appropriate, and reasonable to do so, decide that an exception be made to the normal Assistance Policy.

1.4 In addition the Council has determined that under certain circumstances it shall use its discretion under the legislation to provide additional discretionary grant assistance (see section 3.0 Types of Assistance). This grant assistance is intended to allow additional flexibility within the DFG process however can only be provided should adequate levels of funding allow.

1.5 From 1st April 2015 there was a significant change in the way that national government funding for provision of home adaptations grants (DFG) is paid to local authorities. Instead of national government making a direct payment to each local housing authority to help them to meet the cost of providing Disabled Facilities Grants (DFG), this allocation is now paid through Better Care Funds (BCF). This arrangement presents an opportunity to consider how to integrate provision of help with home adaptations across housing, health and social care systems to achieve better health and wellbeing outcomes for those with Care & Support needs (See Appendix A).

2.0 ROLES AND RESPONSIBILITIES

2.1 **The Role of the Council as 'Housing Authority':**

2.1.1 The legal responsibility for the provision of DFGs sits with Plymouth City Council (The Council) as the 'Housing Authority'. All applications for DFGs must meet the relevant requirements as set out within the legislation. This means that works being requested must be deemed as being 'necessary and appropriate' and 'reasonable and practicable' and eligible works (eligible works are noted in section 23 of the Housing, Grants, Construction & Regeneration Act 1996).

- 2.1.2 By law the Council must consider applications for DFGs and make determinations on those applications within 6 months of receipt. The Council considers that an application for a DFG has been submitted at the point of a satisfactorily completed application form, Occupation/Owners Certificate, Landlord Certificate and any relevant permission in principle. Where a grant is to be means tested, evidence of financial income and savings will be required to consider the application as valid. Note: Where assistance is required to complete the Application Forms, please call 01752 668000, or E-mail: ccspoke@plymouth.gov.uk to discuss this further.
- 2.1.3 The Council have combined the referral and initial application form into one form completed by the 'Social Services' provider. This form is now known as the Independent Living Assistance Application Form. Further information may be required if the application requires a means test.
- 2.1.4 Whilst applications for DFG must be determined within 6 months of receipt, the application must be completed in full to be considered a valid application. The Council will advise if there is missing information. Once an application for a DFG is approved (determined) the Council must ensure that the DFG is completed within 12 months. By combining the referral and application form it is hoped the process will be shorter for applicants.
- 2.1.5 As part of the consideration of an application the Council has a duty to determine whether works being requested are necessary and appropriate and are eligible for DFG funding (eligible works are noted in section 23 of the Housing, Grants, Construction & Regeneration Act 1996). To inform this decision, during the application process the Council has a duty to consult with the 'Social Services Authority'. The Council reserves the right to discharge this duty to Occupational Therapists identified via the Adaptations, Repairs, Maintenance and Improvement (ARMI) Dynamic Purchasing System. This may include a 'Social Services' delivery partner.
- 2.1.6 In addition as part of the consideration of an application the Council has a duty to determine whether works being requested are reasonable and practicable. Factors considered in deciding if the works are reasonable and practicable include the size of the property, the number of occupants, its location and any environmental or physical constraints. This will be determined through information obtained during the application process and observations made during any site visit by the Council or any other party involved in the adaptation works.
- 2.1.7 Where the Council is likely to refuse an application for a DFG, the Council will, where applicable, contact the applicant to give them the opportunity to provide additional information which may affect such a decision, prior to a formal refusal being made.
- 2.1.8 Where the Council has no option but to refuse an application for grant, the Council will advise the applicant of the reasons for such refusal in writing.
- 2.1.9 An applicant will have the right to a review of such a decision and if required, should request a review in writing to the Community Connections Service Director within 28 days of the date of the refusal letter.

- 2.1.10 Where works are approved and undertaken, they must be carried out to the satisfaction of the grant applicant and the Council. The grant applicant will be asked to sign a completion certificate to indicate their satisfaction. However, the Council will have the overriding decision as to whether the works have been carried out to a satisfactory standard and will make direct payments to contractors, other than where a prior agreement has been made with the applicant.

2.2 The Role of the Occupational Therapist:

- 2.2.1 The Council in their role as the Social Services Authority has a duty to respond to consultation requests from the Housing Authority to help determine whether a request for a DFG is necessary and appropriate.
- 2.2.2 The Council commissions a Social Care Delivery Partner to undertake the Social Services role for Adults. Hence, in determining what is necessary and appropriate the Council discharges this duty to Livewell South West, as commissioned by Plymouth City Council. In the case of Children's applications, Occupational Therapy is provided by Children's Social Care, within Plymouth City Council.
- 2.2.3 Following the assessment of a disabled person by an Occupational Therapist, recommendations where adaptations are considered necessary and appropriate, will be received by the Council as a referral (see Appendix B), This will detail the clinical needs of the applicant and the purpose for the grant in accordance with section 23(1) of the Act (see Appendix C).
- 2.2.4 The Occupational Therapist will provide a specification of the requirements using the standard specification and highlighting any variation to the standard specification of works (see Appendix B). They will also provide an estimation of cost and have evidenced a discussion with the applicant in regard to moving to more appropriate accommodation (where applicable) and the applicant covering the cost of works above the grant maximum.
- 2.2.5 The 'Social Services Authority' has a responsibility to provide community care equipment and minor adaptations, which a person has been assessed to need and for which he or she is eligible, free of charge provided the costs (including fittings) is less than £1,000.
- 2.2.6 A minor adaptation (e.g. grab rails, fixed shower seats and ramps) for both adults and children are normally defined by a value of up to £1,000. These works, regardless of cost, if they require traditional building methods (i.e. would be considered 'Construction' work under Construction Design and Management Regulations 2015), may be procured using the Dynamic Purchasing System. This is to ensure best value and regulatory compliance. The application process may differ depending on the nature of the works.

2.3 Role of the Independence Community Interest Company:

- 2.3.1 The Council operates a Dynamic Purchasing System (DPS) to support DFG applicants and those in need of minor building works to meet their home

environmental needs in engaging with reputable and compliant contractors. The system offers consumer protection and insurance backed warranty for the work completed via the system. Independence CIC manage the DPS on behalf of Plymouth City Council.

- 2.3.2 Independence CIC will ensure the compliance of each contractor who is entered into the DPS. This will include all necessary certification, qualifications and insurances. They will provide on-going monitoring of compliance, and address non-compliance as it arises.
- 2.3.3 Contractors entered into the DPS are required to be TrustMark registered. Independence CIC run a TrustMark Operating Scheme and as such where a contractor is registered via Independence CIC, they will complete sample inspections of work completed via the DPS as part of the contractor's membership to the TrustMark scheme.
- 2.3.4 Where non-compliance is discovered or alerted to, Independence CIC will support in resolving disputes, either directly through TrustMark or via an Alternative Dispute Resolution provider.

2.4 Role of the Applicant:

- 2.4.1 The applicant and/or applicants' carer is expected to provide all information relevant to the application as requested and sign the declaration at the end of the application form.
- 2.4.2 As detailed above the Council operate a Dynamic Purchasing System, that the applicant will need to indicate their desire to utilise, within the Application form. However, should the applicant wish to use an alternative contractor of their own choosing, they will be provided with a grant approval figure based upon indicative adaptation costings (See Appendix B) and given the option to self-fund any additional costs. PCC will contact the applicant to assist in all matters relating to the administration of the grant, including submitting a comparable quote for the works from their chosen contractor. The applicant must take full control and be solely responsible for ensuring all works are completed to the satisfaction of the Council prior to the release of any grant funding. The applicant will be responsible for all parts of the works including selecting, instructing, liaising with, and managing the contractor and works, for ensuring the works are suitable for the need and that any relevant permissions/certifications are obtained. Furthermore, the applicant must resolve any issues arising with their chosen contractor themselves.
- 2.4.3 The applicant is expected to keep appointments made with parties involved in the DFG process and ensure they read and understand all correspondence. Where the applicant wishes to undertake work not included within the grant approval, they are expected to self-fund works outside of the grant funded eligible works.
- 2.4.4 Where an applicant has a means tested contribution to make, this must be made directly to the contractor before commencement of the works. No grant funding will be released until the confirmation that the contribution has been paid is received by the Council.

2.5 Role of the Landlord:

- 2.5.1 Where the grant applicant is a tenant, they must ensure their landlord is aware that they intend on applying for assistance to adapt the property.
- 2.5.2 The Council will seek permission in principle to adapt the property from the landlord. Following a design being confirmed as eligible for funding the Council will seek full permission for the works to proceed from the landlord. If the landlord does not give permission to adapt the property to meet the tenant's needs, no application can be accepted, and the tenant will be unable to apply for assistance.
- 2.5.3 Full permission will be sought from the landlord upon receipt of full details of works. The landlord is asked to respond within 5 working days.
- 2.5.4 Where it is considered, by the tenant that their landlord has unreasonably refused permission in principle they must follow the necessary complaints procedure with their landlord or housing association.
- 2.5.5 Means testing, servicing and maintenance of equipment in the case of a tenant:

2.5.5.1 Housing Association Tenants

If the application is made by the tenant, then it is their resources that will be tested. If the application is made by the landlord, then the local authority has discretion on the level of grant offered. The powers in section 31 (3) of the Act provides for a general power to enable a local authority to use its discretion in deciding the level of any grant offered in respect of a landlord's application. Section 31 (3) of the Act also requires authorities to have regard to the extent to which the landlord can charge a higher rent for premises following the completion of works.

2.5.5.2 Private Renting

Most tenancies in the private sector are assured short hold tenancies, which normally run for a fixed term, generally 6 – 12 months. Assured short hold tenancies provide little security for tenants and create uncertainty about how long they will be able to stay in the property.

It is a requirement of the application for DFG that a certificate to state the intention of the applicant to remain living in the property for 5 years. However, for a DFG application the certificate is only about intention and does not require a formal tenancy which will last for five years. Unless it is very unlikely that the tenancy could last 5 years, then this should not be a barrier to a successful DFG application.

The Council has discretion not to require a tenant's certificate where it is "unreasonable in the circumstances to require such a certificate". Para 22(3) of the Act.

The tenant must note that they are responsible for the maintenance and servicing of the equipment after installation.

3.0 TYPES OF ASSISTANCE

3.1 Disabled Facilities Grant (Mandatory Assistance)

- 3.1.1 DFGs are largely subject to the requirements of legislation and are mandatory. Approval is required where an applicant meets specific disability and financial criteria.
- 3.1.2 The assessment of need must detail what is necessary and appropriate to meet the assessed need of the DFG applicant, the eligible works that meet the purpose(s) of the grant (see Appendix C) and provide recommendations for adaptations.
- 3.1.3 These recommendations will form the 'client brief'.
- 3.1.4 The grant will be means tested (except where the works are for a child) and subject to prioritisation. Prioritisation will be as ascertained by the Occupational Therapist.
- 3.1.5 DFG Applicants in receipt of a means tested benefit will not need to be means tested for the grant and will therefore be 'passported' through the application process.
- 3.1.6 The statutory grant maximum is £30,000 (less any means tested contribution, if applicable).

3.2 Discretionary Assistance Allocation (DAA) – 'Top Up' Grant

- 3.2.1 Applications will be available for the provision of a 'top-up' to the Disabled Facilities Grant (Mandatory Assistance) where costs exceed the maximum amount of £30,000. Decisions will be made by the Discretionary Funding Panel (DFP).
- 3.2.2 The 'Top Up' Grant will be subject to means testing regardless of the age of the applicant (already completed for Adult cases as part of the mandatory DFG). For Children's cases, the parent(s) / guardian(s) will subject to a financial assessment to determine their ability to fund additional costs on top of mandatory grant assistance before discretionary assistance will be considered.
Note: Where no assessed contribution is payable, the maximum discretionary assistance of £30,000 will be considered. Where an assessed contribution is payable, this will be taken as a deduction from the maximum discretionary assistance. E.g. if assessed contribution = £5,000, then maximum discretionary

assistance for the 'Top Up' Grant will be £25,000 (this being the maximum £30,000 minus the £5,000 assessed contribution).

- 3.2.3 'Top Up' Grant will be a maximum of £30,000.
- 3.2.4 A local Land charge will be placed upon the property. Should the property be sold within the term of the 'Top Up' Grant, repayment of the 'Top Up' plus interest will be made to the council.
- 3.2.5 The term of the 'Top Up' Grant will be 15 years.
- 3.2.6 The grant will incur interest 'rolled up' for the term of the 'Top Up' Grant and will be charged at 0.5% per annum.
- 3.2.7 DAA applicants with no means tested contribution must have savings of less than £23,250 to be eligible (this amount is the Upper Capital Limit used to determine entitlement to help with the cost of social care from your local Council).

3.3 Discretionary Assistance Allocation (DAA) – 'Moving on Grant' Moving to more suitable accommodation

- 3.3.1 Where required adaptations involve substantial structural alterations or extensions and, in any event, where the cost of the adaptation work exceeds £30,000 (plus 'Top Up' if eligible), then moving to more suitable accommodation shall be considered to address the needs of the household.
- 3.3.2 In addition where it is not possible to provide adaptations to meet the need of the applicant, moving to more suitable accommodation shall be considered.
- 3.3.3 In order to help facilitate a move to appropriate alternative accommodation the Council shall provide grant assistance to cover the 'moving costs' associated with such a move.
- 3.3.4 Eligible 'moving costs' include estate agent fees, solicitor costs, survey costs, stamp duty, removal expenses and the connection or disconnection of appliances.
- 3.3.5 Grant maximum will be £15,000.
- 3.3.6 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.3.7 Grant assistance will be awarded for applicants moving within Plymouth City Council's boundaries only.
- 3.3.8 In order to be eligible for this assistance Community Connections, and 'Social Services' must be involved in the property identification process and to ensure the existing accommodation cannot be adapted to meet the assessed need. Where an applicant chooses to move to an unsuitable property or does not involve both Community Connections and 'Social Services' in the property identification process, they will not be eligible for this assistance.

3.4 Discretionary Assistance Allocation (DAA) - 'Fast Track' Adaptations

- 3.4.1 Applications will be 'Clinically Fast Tracked' if they are for terminally ill applicants with a prognosis of less than 12 months or with a rapidly progressive condition, e.g. MND.
Note: The client will be required to have a completed SRI form or meet the requirement for this or other reasonable medical evidence (please discuss this with your Occupational Therapist).
- 3.4.2 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.4.3 Grants will be a maximum of £10,000. Costs above this maximum may be considered in exceptional circumstances.

3.5 Discretionary Assistance Allocation (DAA) - 'Hospital Discharge' Adaptations

- 3.5.1 Works to allow the applicant to be discharged from hospital or Care facility, or; an individual is at risk of admission to an inpatient setting due to an unmet housing need.
- 3.5.2 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.5.3 Grants will be a maximum of £10,000. Costs above this maximum may be considered in exceptional circumstances.

3.6 Discretionary Assistance Allocation (DAA) - 'Replacement Hoist or Stairlift'

- 3.6.1 Cases will only be considered where evidence is provided by the applicant that the lift is beyond its lifetime and/or cannot be repaired. The applicant will be expected to provide evidence of good maintenance practice of the hoist/stair lift since its original installation.
- 3.6.2 All applications for a replacement Hoist or Stairlift will require a new Occupational Therapists assessment to ensure that needs have not changed during the lifespan of the existing stairlift.
- 3.6.3 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.6.4 Grants will be a maximum of £10,000. Costs above this maximum may be considered in exceptional circumstances.

3.7 Discretionary Assistance Allocation (DAA) - 'Cleaning or clearance of a home to enable safe discharge from hospital'

- 3.7.1 Clearance of a home to allow the applicant to be discharged from hospital or Care facility, or; cleaning or clearance of a home where an individual is at risk of admission to an inpatient setting.
- 3.7.2 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.7.3 Grants will be a maximum of £5,000. Costs above this maximum may be considered in exceptional circumstances.

3.8 Discretionary Assistance Allocation (DAA) - 'Works for people with dementia'

- 3.8.1 Works for applicants with dementia, including colour and contrast decorating, carbon monoxide/cold/heat alarms, lighting, safety flooring, digital technology
- 3.8.2 The application will be moved through to completion and not be subject to any prioritisation process or means test.
- 3.8.3 Grants will be a maximum of £5,000. Costs above this maximum may be considered in exceptional circumstances.

3.9 'Nil Grant' Applications

- 3.9.1 Following the mandatory means test for Disabled Facilities Grants, should an applicant's contribution exceed the cost of the works deemed necessary, and the applicant wishes to fund the works themselves then the applicant will be offered a 'Nil Grant' Application.
- 3.9.2 'Nil Grant' Applications will be supported via the Dynamic Purchasing System.
- 3.9.3 A fee of 1% of the cost of the works will be paid to Independence Community Interest Company for use of the Dynamic Purchasing System.
- 3.9.4 A fee of 2.5% of the cost of the works will be paid to Plymouth City Council to cover administration costs.

3.10 Discretionary Assistance Availability

- 3.10.1 The availability of all discretionary grant assistance is subject to the Councils annual budget setting procedure and the availability of sufficient levels of funding.
- 3.10.2 All such payments are at the Council's discretion and will be removed once available funds are exhausted.

3.10.3 Mandatory Assistance will take priority over Discretionary Assistance.

3.10.4 If demand for Mandatory Assistance was at a level where there were insufficient funds to offer Discretionary Assistance the applicant will be offered a choice of proceeding with the works via a Mandatory Disabled Facilities Grant (and thus its requirements) or waiting until funding becomes available.

3.10.5 The council would not therefore be in breach of its Statutory Duty to approve a Mandatory Disabled Facilities Grant to an eligible applicant.

4.0 PRIORITISATION PROCESS

- 4.1 Applicants will be allocated an initial prioritisation from point of triage, by the Occupational Therapist. Mostly, this will be at initial contact to the Council. This triage prioritisation will assist in managing demand for Occupational Therapy Assessment in relation to adaptations.
- 4.2 Furthermore, during periods of high demand, the Council reserves the right to use a needs-based prioritisation scheme to ensure priority is given to those applicants for DFGs who are in greatest need. This prioritisation will be determined by the assessing Occupational Therapist, upon completion of clinical assessment and consideration of risk. The prioritisation will be a 'fast track', 'red', 'amber', 'green' system, where 'fast track' is the highest priority and thus the risk of injury to the applicant if adaptations are not provided is higher. This prioritisation will be used to determine when works can commence.
- 4.2 The Occupational Therapist will discuss their assessed priority with the applicant during the assessment.
- 4.3 The applicant will receive notification of their priority within their needs assessment. Based on this priority the applicant will be advised of likely timescale for dealing with recommended adaptations following this being received by Community Connections.
- 4.4 As detailed above the level of priority is determined following a needs-based assessment. If an applicant's health deteriorates from the initial assessment there will be the opportunity for their case to be reprioritised, subject to advice and information from the assessing Occupational Therapist.
- 4.5 If an applicant is dissatisfied with the priority they have been awarded, they may appeal against the decision made, in writing, outlining the reasons why they feel the case has been incorrectly assessed, by contacting Adult Social Care.

5.0 REFERRAL PROCESS

- 5.1 Requests for assessment regarding the home environment for children or adults will initially be made via Social Care (for Adults this is Livewell South West).
- 5.2 A clinical assessment of functional need within the home environment will be conducted by an Occupational Therapist or Assistant (please refer to Social Care guidelines for

timescales) to identify what is necessary and appropriate to meet the assessed need within the home environment.

- 5.2 As part of their engagement, the Occupational Therapist will discuss different options regarding the applicants housing needs. Should other Social Care needs be identified they will make the appropriate referral. For example, if the applicant's needs can be met through equipment provision, it may be that adaptations to your property are not deemed necessary or appropriate and will therefore not be eligible for DFG.
- 5.3 Upon receipt of the Application form from the Occupational Therapist, as agreed with the applicant, Community Connections will confirm receipt of the form from Social Care and provide a copy of the recommendations to the applicant.
- 5.4 The Application form will then be processed, and any mean testing will be undertaken. Should further information be required, Community Connections will make this request of the applicant.
- 5.5 Community Connections will establish eligibility (including means testing, where applicable), and notify the applicant of any assessed contribution they have to make towards the cost of the works. For the application to progress, the applicant will have sign to agree to pay their contribution before the works commence.
- 5.6 The priority detailed by Social Care will determine when the case will be submitted to the appropriate 'Lot' within the Dynamic Purchasing System. If the applicant wishes to use their own contractor to undertake the work, they should discuss this with their allocated DFG Officer.
- 5.7 Once costings for the required adaptation have been provided by suppliers, the Council will consider if the works are 'reasonable and practicable'.
- 5.8 The Council will then notify the applicant in writing of the grant determination. This may either be rejection of the application if not considered eligible or formal approval of the grant.
- 5.9 Within the formal approval of grant letter the applicant will be notified of expected completion timescales (in accordance with their priority, where applicable).
- 5.10 The awarded provider will arrange to complete the works with the applicant.
- 5.11 Works must be completed within 12 months of the date of valid application.
- 5.12 The works must be completed in a safe and compliant manner.
- 5.13 Where the provider is selected by the grant applicant, the grant applicant must take on the role of 'Domestic client' under the Construction Design and Management Regulations 2015. Where the provider is selected by the Council via the Dynamic Purchasing System, the Council will take on the role of the 'Domestic Client'. This is regardless of tenure.
- 5.14 Where statutory permissions are required; these must be obtained prior to work commencement.

- 5.15 Grant payment will not be released until all certification and compliance notification is received by the Council. This will include, electrical and gas safety certificates, building control certificates, and any other compliancy requirements related to the specific works.

6.0 MEANS TESTED CONTRIBUTIONS

- 6.1 As part of the Mandatory Disabled Facilities Grant application process, a standard test of resources is undertaken to determine whether the applicant needs to make a financial contribution toward the cost of works undertaken.
- 6.2 The Council will use its discretion under the Regulatory Reform Order 2002 to provide 'non-means tested' DFG, as detailed in section 3.0.
- 6.3 Applications for mandatory grant assistance to meet the needs of a child (valid application must be before 19th birthday), are 'non-means tested'. Please refer to section 3.0 for discretionary assistance.

7.0 REPAYMENT AND RECOVERY OF SPECIALISED EQUIPMENT

7.1 Repayment of Grant

- 7.1.1 The Council will reclaim funding for DFG works that exceed £5,000 up to a maximum of £10,000 where the homeowner sells the home within 10 years of the grant completion¹.
- 7.1.2 A charge will be registered as a local land charge on the title deeds of the property.
- 7.1.3 This money is recouped via the land charge.
- 7.1.4 The local housing authority may demand the repayment by the recipient of such part of the grant that exceeds £5,000 (but may not demand an amount in excess of £10,000) if:
- (a) the recipient disposes (whether by sale, assignment, transfer or otherwise) of the premises in respect of which the grant was given within 10 years of the certified date; and
 - (b) the local housing authority, having considered:
 - (i) the extent to which the recipient of the grant would suffer financial hardship were they required to repay all or any of the grant;
 - (ii) whether the disposal of the premises is to enable the recipient of the grant to take up employment, or to change the location of their employment;
 - (iii) whether the disposal is made for reasons connected with the physical or mental health or well-being of the recipient of the grant or of a disabled occupant of the premises; and
 - (iv) whether the disposal is made to enable the recipient of the grant to live with, or near, any person who is disabled or infirm and in need of care,

¹ The Housing Grants, Construction and Regeneration Act 1996: Disabled Facilities Grant (Conditions relating to approval or payment of Grant) General Consent 2008

which the recipient of the grant is intending to provide, or who is intending to provide care of which the recipient of the grant is in need by reason of disability or infirmity,

and it is satisfied that it is reasonable in all the circumstances to require the repayment.

- 7.1.5 In addition, any recipient of a DFG that has adaptations carried out and subsequently moves property within the City and is seeking further grant assistance to install similar adaptations to those previously funded, then the cost of the original adaptation will have to be repaid by the applicant before new adaptations can commence.
- 7.1.6 Each case will be considered on its own merits and evidence to justify the move will be required to avoid repayment of grant. The applicant will have to provide evidence and justification in writing to Community Connections.
- 7.1.7 Where charges are levied, then in each case the Council must be satisfied that it is reasonable to require the repayment and will consider this in line with the legislation.

7.2 Recovery of Specialist Equipment

- 7.2.1 Where an application for Disabled Facilities Grant has been approved under section 23(1) of the Act and the eligible works consist of or include the installation in the property of specialised equipment for the disabled occupant(s), the applicant shall notify the Council if and as soon as the equipment is no longer needed².
- 7.2.2 For the purposes of this condition;
 - 7.2.2.1 the Council shall, on approving the application, specify in writing the equipment to which this condition is to apply and the period (being a reasonable condition period for the equipment in question) during which it is to apply, and shall serve on the applicant a copy of such written specification; and
 - 7.2.2.2 the Council, or Social Services on their behalf, shall be entitled, upon reasonable prior notice given to the applicant, inspect the equipment and, to remove it.
- 7.2.3 The Council agrees, within a reasonable time following inspection (by the provider) of the equipment:
 - (a) to notify the applicant whether the equipment is to be removed; and
 - (b) if the equipment is to be removed, arrange for it to be removed and to make good any damage caused to the property by its removal.
- 7.2.4 Subject to the Council (or Provider) giving prior notice in accordance with the above the applicant is expected to give the Council (or Provider) reasonable access to the property for the purposes of inspection and removal of the equipment.

² The Housing Renewals Grants (Additional Conditions) (England) General Consent 1996

- 7.2.5 In the event of a breach of any of the conditions set out above, the Council may demand repayment from the applicant of a sum equal to the amount of the grant paid and the same shall become repayable to the Council in accordance with Section 52 of the Act.³

8.0 APPLICANT NO LONGER ENTITLED TO GRANT

- 8.1 Where a grant applicant ceases to be entitled to a grant before completion of the works, the Act states that the Council cannot pay any grant or any further instalments after that date. If the grant applicant makes an owner's application, he ceases to be entitled to a grant when he ceases to have a qualifying owner's interest or ceases to have the intention specified in the owner's certificate which accompanied the grant application.
- 8.2 If the grant applicant makes a tenant's application, he ceases to be entitled to a grant when he ceases to be a qualifying tenant of the dwelling or if the landlord ceases to have the intention specified in the owner's certificate submitted with the application.
- 8.3 The Council has the right under the legislation to demand any instalment that has already been paid to be repaid forthwith together with interest from the date on which it was paid until repayment. The Council will consider each case on its own merits in deciding whether to recover any such payments.

9.0 CHANGES IN CIRCUMSTANCES

- 9.1 In some cases there is a change of circumstances after the grant has been formally approved that may affect the payment of grant. These circumstances detailed in the Act are:
- 9.1.1 where the medical need changes and the approved grant eligible works are no longer considered necessary or appropriate to meet the needs of the disabled person,
 - 9.1.2 the disabled occupant ceases to occupy the dwelling,
 - 9.1.3 the disabled occupant dies.
- 9.2 In such circumstances, the Act states that the Council can take appropriate action and may:
- 9.2.1 refuse to make any payment, or further payment of grant.
 - 9.2.2 agree that the works or a portion of the works will be completed and the grant or an appropriate proportion of it paid.
 - 9.2.3 request that the application should be re-determined given the new circumstances.

³ This includes reference to compound interest (currently at 8%)

- 9.3 The Council has the right under the Act to demand any instalment that has already been paid to be repaid to the Council together with interest from the date on which it was paid until repayment. Each case will be considered on its own merits in deciding whether to recover any such payments.

10.0 CASES IN WHICH GRANT MAY BE RECALCULATED, WITHHELD, OR REPAID

- 10.1 The Council can refuse to pay grant or any further instalment of grant which remains to be repaid or make a reduction in the amount of grant if:
- 10.1.1 The Council ascertains that the amount of grant was approved based on inaccurate or incomplete information and exceeds that to which the grant applicant was entitled.
 - 10.1.2 The Council ascertain that without their knowledge the eligible works were started before the application was approved.
 - 10.2.3 The works are not completed within 12 months (due to applicant action or inaction).
 - 10.2.4 The cost of works is less than the estimated expense upon which the grant was calculated.
 - 10.2.5 The work has been carried out by a contractor who was not one of the contractors who originally quoted for the work.
- 10.2 Where any of the above situations arise, the Council can demand repayment by the applicant in whole or part, of the grant or any instalment of the grant paid together with interest from the date of payment until repayment³. Each case will be considered on its own merits in deciding whether to recover any such payments.

11.0 CONDITIONS AS TO REPAYMENT IN CASE OF COMPENSATION

- 11.1 Where the Council approve an application for a grant, they impose a condition requiring the applicant to take reasonable steps to pursue any relevant claim to which this section applies and to repay the grant, so far as appropriate, out of the proceeds of such a claim.
- 11.2 The claims to which this section applies are:
- 11.2.1 an insurance claim, or a legal claim against another person, in respect of damage to the premises to which the grant relates, or
 - 11.2.2 a legal claim for damages in which the cost of the works to premises to which the grant relates is part of the claim;
- and a claim is a relevant claim to the extent that works to make good the damage mentioned in paragraph (11.2.1), or the cost of which is claimed as mentioned in paragraph (11.2.2), are works to which the grant relates.
- 11.3 In the event of a breach of a condition under this section, the applicant shall on demand pay to Plymouth City Council the amount of the grant so far as relating to any such works, together with compound interest as from such date as may be prescribed by or

determined calculated at such reasonable rate as the authority may determine and with yearly rests⁴.

12.0 DEFERRING GRANT PAYMENT

- 12.1 The Council has the discretion to defer any payment of an approved grant for a period of up to twelve months from the date of grant approval.
- 12.2 Any such decision must be set out within the grant approval notice.

13.0 GRANT CONDITIONS

- 13.1 Throughout this policy reference is made to grant conditions, these are detailed below:
 - 13.1.1 The grant conditions run for a period of time following the completion of the works, this is known as the grant condition period. The conditions run from the certified date, which is the date that the Council certifies the grant funded work as completed to its satisfaction.
 - 13.1.2 This period is 5 years.
 - 13.1.3 A local land charge will be registered for a period of 10 years in the case of owner occupiers.

14.0 DISPUTES ABOUT THE ASSISTANCE PROVIDED

- 14.1 Nothing in this document is to be interpreted as committing the Council to the approval, or payment, of assistance towards works to the property.
- 14.2 Nothing in this policy is to require the consideration of an application for financial assistance where:
 - 14.2.1 There is an excessive risk to the health and safety of Council staff, agents, or other persons or
 - 14.2.2 There are any indications that there is a fraudulent element to the application or
 - 14.2.3 There are outstanding monies owed to the Council (other than by way of an agreed mortgage where the repayment schedule has been maintained) or
 - 14.2.4 The applicant fails to co-operate with the Council (or other persons) in their reasonable requirements to enable this application to be considered (or to be considered in the context of delivering the assistance programme to other applicants) or

⁴ Currently 8% compound interest, which may be charged from the date of payment

14.2.5 There are other difficulties whereby the approval of an application for financial assistance is unlikely to result in the relocation to an appropriate property.

14.3 Decisions regarding these matters are to be referred to the Community Connections Service Director.

14.4 If you are not satisfied with the decision made regarding works that are eligible for grant funding or any other aspect of the service, you can make a complaint via:

<https://www.plymouth.gov.uk/feedbackandcomplaints/makegeneralcomplaintcomplimentorgiveusyourfeedback>

15.0 FRAUD

15.1 If the Council discovers that the details of the application are incorrect, misleading, or that the quotations have been subject to collusion, or that any other attempt has been made to defraud the Council, then the approval may be cancelled, any payments made may become repayable (together with interest) and, in appropriate cases, the matter will be investigated and may be subject to prosecution.

16.0 CONSULTATION

Agreed with the Plymouth City Council Portfolio Holder for Housing & Co-operative Development, pre-policy consultation has been conducted from Friday 07 February to Friday 14 March 2025. The below partners, organisations, internal departments and user groups have all been contacted.

Livewell

Plymouth Community Homes

PCC Departments:

- Adult Social Care
- Children's Young People & Families
- Commissioning
- Community Connections
- Community Learning Disability Team
- Across PCC via PCC Staffroom

Aster Group

Hastoe Housing Association

Plymouth Charity Trust

Stonewater

South Devon Rural

Clarion Housing Association

Salvation Army

Sanctuary Housing

Guinness Partnership

Westward Housing Group Limited

Willowtree Housing Partnership (formerly South Western Housing Society and Tamar Housing Society)

Bournemouth Churches Housing Association (BCHA)

Livewest Housing Association

Sovereign Housing Association

Highbury Trust

Improving Lives Plymouth (DIAC)

Plymouth Area Disability Action Network:

Plymouth Dementia Action Alliance (PDAA)

Motor Neurone Disease Association

SSAFA

Age UK

Plymouth Octopus Project

Royal British Legion

Elder Tree Befriending Service

Family hubs (via Community Empowerment, Libraries PCC Commissioning)

End users identified by key stakeholders

Children's Young People and Families

Community Learning Disability Team

Adult Social Care

Commissioning

Dementia Friendly City Co-ordinator

The main considerations resulting from these consultations are:

- Increased scope of discretionary funding.
- Offer of low-cost loan service for DFG applicants – Subject to future policy revision. Note: Funds are required to introduce this, and further discussion is required at this time.
- A list of competent contractors to deliver adaptation works for applicants who are privately funding their adaptations.
- Continuation of the 'Nil Grant' offer as a low-cost service where applicants can pay for their own adaptation works. Note: This offer is only available to applicants with a higher contribution than the cost of their works following a financial means test, see section 3.9.
- Continued use of alternative methods of delivery, including modular extensions (in place of traditional construction), modular ramps (in place of concrete ramps) and wall panelling (in place of wall tiles).
- Renewed scrutiny around requests for hardstandings and consideration of alternatives to meet the assessed need(s).

- Selection of DFG contractors being influenced by the contractor's commitment to Net Zero.

In response to these considerations, we have:

- Increased the discretionary assistance for 'Top Up Grant', see section 3.2.
- Revised the discretionary assistance offer, please see sections 3.2 to 3.9 inclusive.
- Introduced modular construction, modular ramps and wall panelling as acceptable alternatives to traditional construction, concrete ramps and wall tiling respectively.

17.0 APPLYING FAIRNESS

- 17.1 The Council's policy is to treat all those that apply for assistance fairly and on an equitable basis founded on case by case needs assessment, regardless of gender, sexual orientation, marital status, race, nationality (including citizenship)⁵, disabilities or religious or political affiliation.
- 17.2 The Council regularly monitors its applications for assistance to ensure that policies and procedures comply with current equal opportunities legislation.
- 17.3 An Equality Impact Assessment has been carried out and is available to the public via the Plymouth City Council website.
- 17.4 Plymouth's agreement with the Fairness Commission states that Plymouth City Council should commit to fairness in what it does, how it does it, and who gets what:

In this instance the following principles apply:

- 17.4.1 The city should give priority to those in greatest need when it allocates resources.
- 17.4.2 Things that make the biggest difference to people's lives should get priority when deciding where resources go.
- 17.4.3 Preventing inequalities is more effective than trying to eliminate them.
- 17.4.4 Services should be provided 'with' people, not 'for' them.

18.0 ACCESS TO INFORMATION AND DATA PROTECTION

The information collected on the questionnaire, application form and supporting evidence from Plymouth City Council will be used to process applications for assistance. The information may be passed on to the Department of Work and Pensions and Inland Revenue as permitted by law.

The Council may also check the information provided by the applicant or information provided by a third party, with other information held by the Council.

The Council may also obtain information from certain third parties or give information to them to check the accuracy of the information, to prevent or detect crime, or to protect public funds in

⁵ (subject to Appendix B – General Conditions of Assistance, item 12 – Persons from abroad)

other ways, as permitted by law. These third parties include Government Departments and other Local Authorities.

Personal information will not be disclosed about applicants to anyone outside Plymouth City Council nor will we use information about you for other purposes unless the law permits this. Where requested by the applicant in writing, we will share the full DFG referral, e.g. with Housing Associations, to support a request for their consent to proceed with adaptation works.

Information may be used for statistical purposes. Such information will be displayed so that it cannot be attributed to any person.

We will never share or use your information for marketing purposes.

We will only keep your information for 6 years. It will be stored and processed in line with the principles of the Data Protection Act 2018. You have certain rights under the Data Protection Act and the EU General Data Protection Regulations (GDPR), which include the right to access, rectification and erasure. To enforce these rights or enquire about any other aspects of data protection, please contact:

Data Protection Officer, Plymouth City Council, Ballard House, West Hoe Road, Plymouth PL1 3BJ.
Email: dataprotectionofficer@plymouth.gov.uk

Plymouth City Council is registered as a data controller with the Information Commissioner's Office (registration number: Z7262171).

The Council's full Privacy notice can be found at:
<https://www.plymouth.gov.uk/aboutwebsite/privacypolicy>

19.0 REVIEW AND REVISION OF THIS POLICY

This policy will be reviewed and revised as and when required.

This Policy, when approved, will be advertised, as required, in accordance with the provisions of Article 4 of the Regulatory Reform (Housing Assistance) (England & Wales) Order 2002.

20.0 APPENDICES

Appendix A – Housing and Health

In order to meet a range of performance outcomes and to manage local needs, a budget for provision of DFG will usually require contributions from housing, social care and health. The allocation from national to local government is intended to contribute towards meeting local need, but is not expected to meet all local needs, hence contributions will be required and/or demand will need to be managed.

Home adaptations contribute to meeting a range of Public Health, NHS and Social Care Outcomes⁶.

The vast majority of disabled people (all ages) live in general (not specialist) housing, and so home adaptations play a key role in enabling safe, healthy and independent living at home. Whilst efforts are being made to increase the development of specialist new build homes, this will not satisfy the demand for adapted homes, and these will invariably require adaptations themselves.

Home adaptations can reduce health and social care costs, help to reduce risk of injury e.g. from falls, enable faster hospital discharge, delay onset of admission to residential care and reduce care costs e.g. for people with dementia.

The quality and suitability of the home environment is particularly important for disabled people, older people, those living with a chronic disease e.g. dementia or the consequences of a serious injury, and those who experience functional and cognitive difficulties.

The Council's ;Plan for Homes 4; is our latest housing strategy, the plan contains 10 initiatives to support five key themes, one of these being specialist and supported housing

This can be found using the following link:

[The Plan for Homes | PLYMOUTH.GOV.UK](https://www.plymouth.gov.uk/planning-and-building-control/planning/planning-policy/planning-policy-10-the-plan-for-homes-4)

Health and care leaders have come together to develop a Long Term Plan⁷ to make the NHS fit for the future, and to get the most value for patients out of every pound of taxpayers' investment.

This plan has been drawn up by those who know the NHS best, including frontline health and care staff, patient groups and other experts. The plan represents the opinions and interests of 3.5 million people.

⁶ Care & Repair England (2015): Integration Briefing 1, Disabled Facilities Grant Funding via Better Care Funds – An Opportunity to Improve Outcomes.

⁷ NSH: January 2019, Long Term Plan

Some of the ways the plan sets out improve care for patients over the next ten years relate to the home environment, and the types of assistance set out in the policy:

- helping more people to live independently at home for longer
- developing more rapid community response teams to prevent unnecessary hospital spells and speed up discharges home.
- making further progress on care for people with dementia
- giving more people more say about the care they receive and where they receive it, particularly towards the end of their lives.

The main legislative framework governing DFGs is provided by the Housing Grants, Construction and Regeneration Act 1996 (the Act). Since 1990, local housing authorities have been under a statutory duty to provide grant aid to disabled people for a range of adaptations to their homes. This grant aid is means tested for adults (not for children) and eligibility is defined in the Act.

Recognition of the Armed Forces - Under section 343AA of the Armed Forces Act 2006 (inserted by section 8 of the Armed Forces Act 2021), local authorities are required to have due regard to the three principles of the Armed Forces Covenant when exercising certain housing functions, including allocating disabled facilities grants. Under this provision, special provisions for veterans may be justified in some circumstances.

The Housing Act 2004, Local Authorities have a duty to keep housing conditions under review, including having regard to particular hazards that might be dangerous or prejudicial to health for certain vulnerable groups.

Social care authorities have had legal obligations concerning provision of help with home adaptations for disabled people that pre-dates the housing law.

With the introduction of the Care Act 2014, there remain social care duties in relation to the delivery of home adaptations. These include, for example, adult social care statutory requirements under the Care Act to assess needs and to arrange for appropriate assistance to be provided and statutory entitlements to community equipment and minor adaptations (e.g. handrails to the access to a property or lever taps to a kitchen sink or washbasin).

The nine point legal definition of wellbeing in the Care Act includes 'suitability of living accommodation' (Care Act 2014 (section 1(2))). Four outcomes listed in the eligibility regulations under the Act can be affected by home adaptations:

- Maintaining personal hygiene
- Managing toilet needs
- Maintaining a habitable home environment
- Being able to make use of the home safely

Note that disabled children also have entitlements to DFG as defined by the Act and there is consequently a further legal interface with legislation concerning social care and children, not detailed here, but in the Children Act 1989.

The Government's Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) provided opportunities for Local Authorities to make significant changes to the way they tackle housing issues. The adoption and publication of a Policy for housing assistance is a requirement of the RRO before any assistance can be offered. Under the RRO, a Council has the discretion to decide whether it provides grants, loans, advice etc. for the purpose of repairing, improving, extending, converting or adapting housing accommodation.

The Council can decide the extent to which it offers assistance and what conditions are applied to these services. The exception to this is the mandatory Disabled Facilities Grant (DFG), the terms and conditions of which remain substantially as set out in the Housing Grants, Construction and Regeneration Act 1996. However, the Government has issued three consents which enable the Council to apply conditions to DFGs in addition to those specified in the 1996 Act, namely:

- The Housing Renewal Main Grants (Recovery of Compensation) General Consent 1996 (This relates to the repayment of grant where the beneficiaries have received compensation relevant to the works carried out)
- The Housing Renewals Grants (Additional Conditions) (England) General Consent 1996 (This relates to the recovery of grant aided equipment where it is no longer required by the disabled person)
- The Housing Grants, Construction and Regeneration Act 1996: Disabled Facilities Grant (Conditions relating to approval for payment of Grant) General Consent 2008 (This relates to the repayment of a portion of the grant monies should the property be sold or ownership transferred)

All three of these consents have been incorporated into this policy. Further details are provided in the policy.

DFG's are mandatory grants and are available to disabled people when works to adapt their home are deemed necessary and appropriate to meet their needs and when it is reasonable and practicable to undertake such adaptations having regard to the age and condition of the dwelling or building.

In order for the Council to determine whether adaptations are necessary and appropriate, the Council is required to liaise and consult with the Social Services Authority regarding the adaptation needs of disabled people (as stated in Section 24 of the Housing, Grants, Construction, Regeneration Act 1996). Generally, the Council will accept those recommendations provided by the Occupational Therapist (OT) however in order to best use resources there may be a need to better identify and fully explore alternative solutions in some instances, for example relocation by means of a Discretionary Relocation Grant.

One of the key areas of connection between housing law and social care law with regard to provision of DFG is the decision about what adaptations a DFG grant should pay for.

Housing authorities themselves must decide what action to take regarding the award of a DFG on the basis of the advice from the social care authority about what works are 'necessary and

appropriate', alongside their own judgement as to whether the recommended/requested adaptation is 'reasonable and practicable'.

It is important to note that social care eligibility criteria (e.g. only providing help for those assessed to have eligible care and support needs under the Care Act 2014) do not apply to housing legislation, including the Act and DFG regulations, and DFGs should not be limited on this basis.

There are, however, occasions whereby it is not reasonable and practicable to adapt a property, based on its age, condition and/or layout. In cases where it is not possible to adapt a property to an appropriate standard or where the cost of the works is considered excessive the Council may determine that works are not reasonable and practicable and may require other options to be considered, e.g. Discretionary Relocation Grant or alternative housing solution.

The Council is sensitive to the aspirations of all applicants; however, these will not automatically form part of the considerations surrounding the determination of the most appropriate scope of works which would be eligible for grant funding. However, should the applicant wish to enhance the eligible works, consideration will be given to self-funded enhancement, as long as the needs are met (e.g. additional/coloured tiling as part of a Bathroom Adaptation).

Mandatory DFG's are subject to a means test (except in the case of children) giving due regard to the financial position of the applicant. This will determine the amount (if any contribution) they may be required to make towards the cost of the works and hence the amount of Grant available to them. Applicants in receipt of certain benefits are also exempt, and considered 'passporting', details of which will be given upon application.

It is important to note that the means testing process is clearly defined by the Regulations and the Council does not have any discretion in applying it.

The current maximum Grant limit is £30,000 and all applications must be approved within 6 months of the full and complete application being submitted to the Council.

The grant can be recovered following the relevant disposal of the property within 10 years of payment provided that the Council is satisfied that it is reasonable to do so. Grants below £5,000 are excluded and the maximum amount that the Council can recover is £10,000.

- This Assistance Policy re-asserts the need to apply Section 52 of the Housing Grants, Construction and Regeneration Act 1996, which sets out the principles of seeking repayment of grant under specific circumstances. This power has the advantage that on repayment, the monies can be re-used to assist other applicants in need of home adaptations.

Appendix B - Application Form**INDEPENDENT LIVING ASSISTANCE**

Housing Grants, Construction and Regeneration Act, 1996

Regulatory Reform Order (2002)

Application Form

APPLICANT:					
Full Name *:				Address *:	
Date of Birth *:				Postcode *:	
Male *	<input type="checkbox"/>	Female *	<input type="checkbox"/>	E-mail Address *:	
Eclipse ID *:				Date of First Contact with ASC *: <i>Date of first contact specifically related to works in this application.</i>	
<p>Please confirm your preferred means of communication here: (E-mail / Telephone / Letter – please delete as applicable)</p> <p>Please note we will communicate with you via email unless specified above.</p> <p>Communication information: Please add a note here if there is anything that needs to be shared with us and Contractors when contacting the client (e.g. client has a hearing impairment / mobility impairment and might take an extended time to answer the phone / door / when visiting / please knock on the door to the rear of the property etc.)</p> <p>As the Client, if your telephone number changes, please E-mail communityconnections@plymouth.gov.uk or phone 01752 398500 with your name and address and new phone number so we can update our records. This will help to avoid any delay as your case progresses.</p>					
Telephone Number *:				NI Number *:	
Does anyone hold Power of Attorney for you? If so, please include their name, address & telephone number *:			Yes or No – Please provide details		
Is there someone else with whom you are happy for us to communicate? If so, please include their name, address, telephone number & relationship to you:			Y or No – Please provide details		
ACCOMMODATION *:					
Are you a:	Owner Occupier - If leasehold only, please specify the freeholder below:			<input type="checkbox"/>	Tenant: <input type="checkbox"/>
	Living with parents / family member:			<input type="checkbox"/>	Shared Ownership: <input type="checkbox"/>
Who else lives in the house with you?	Name		Relationship		
	Contact Number		Date of Birth		
	Name		Relationship		
	Contact Number		Date of Birth		
	Name		Relationship		
	Contact Number		Date of Birth		

Housing Association / Private Landlord / Freeholder (if applicable):	Name		Company	
	Contact Number		Email Address	

INCOME (THIS SECTION MUST BE COMPLETED FOR APPLICATION TO BE ACCEPTED) *:

Do you or your partner receive any of the following (you will need to provide proof of benefits upon request):
YES or NO

		Documents seen by Livewell
Guaranteed Pension Credit	<input type="checkbox"/>	<input type="checkbox"/>
Housing Benefit	<input type="checkbox"/>	<input type="checkbox"/>
Universal Credit	<input type="checkbox"/>	<input type="checkbox"/>
Income Support	<input type="checkbox"/>	<input type="checkbox"/>
Employment Support Allowance (income based)	<input type="checkbox"/>	<input type="checkbox"/>
Jobseeker's Allowance (income based)	<input type="checkbox"/>	<input type="checkbox"/>
Working/Child Tax Credit (with a household income less than £15,050)	<input type="checkbox"/>	<input type="checkbox"/>

FURTHER INFORMATION *:

Do you receive paid care?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Does a family member care for you?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you previously applied for a DFG?						Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If yes, please give details (including description of works and approx. date):									
Will you or a member of your family carry out the works?						Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you already begun the works?						Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Have you already finished the works?						Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

OCCUPATIONAL THERAPIST ASSESSMENT *:

Therapist's Name:		Telephone Number:			
E-mail Address:					
OT Manager's Name: (Checked by)		Date:			
Community Connections: (Checked by) (Not to be completed by Livewell SW)		Date:			
Should Community Connections contact the OT prior to contacting the client?		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Is the customer registered on Devon Home Choice:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Band			
Feasibility Visit Has a Feasibility Visit been carried out for this case? If Yes, please provide details: <i>(Please note that Feasibility Visits can be carried out virtually / Google Street View can be used to look at front access)</i>								
Comments regarding paid care The provision of an adaptation could have a direct impact on the necessity for continued care. If this applies in this case, please provide details: (N.B. This may impact on the points system and may highlight if there is some other action that could be taken).								
Amount of paid care (£) per week	before adaptation			after adaptation				
Adaptation Requirements - Reasoning and Recommendations <i>(Please give detailed information regarding the ability of the person and potential for deterioration (physical, sensory, cognitive, learning disability for example) and how this affects their function (i.e. abilities and needs)). You should consider – E.g. Client, environment, task, family dynamics e.g. where TFL required. Please remember to include any relevant points which were discussed with the Client, e.g. Stairlift discussed but agreed not necessary and appropriate at this time or declined by the Client, option of moving has this been considered/discounted and why)</i>								
Access (REQUIRED)*: Comment on access to/from property and applicant's ability to manage access currently and in the future: <i>(Please consider if adaptations are required to access in the future. Consideration should be given where works are required within communal hallways/footpaths/entrance doors as this might not be eligible for grant funding and could have a detrimental effect on other occupants sharing these facilities)</i>								
Suitability of property Long Term (REQUIRED)*: Comment on suitability of property to meet persons long term needs (if recommended adaptations go ahead): <i>(Please note any future works that might be required for this Client stating reasons why they are not necessary and appropriate at this time)</i>								
What is necessary and appropriate to meet the need? * <i>(List the N&A (necessary and appropriate) in clear terms of what is required, not a wish list, sufficient and clear descriptions and reasoning are required the recommendations should meet the persons needs for the next 5 years at least). Please see Appendix 4 for current eligibility. Please also consider if the Client is not able to remain in the property while the works are completed – Please discuss this with your Localities/DFG Lead before submitting your referral).</i>								
May we share the information given in this form with others involved in your grant? <i>(this could include bodies outside of Plymouth City Council)</i>					Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Would you like PCC to select a contractor on your behalf? (See Appendix 2).					Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
The works to be undertaken are covered under the Construction Design and Management Regulations 2015, are you happy for PCC to act as the client in regard to these regulations (See Appendix 3).								

RAG Rating *					
Red	<input type="checkbox"/>	Amber	<input type="checkbox"/>	Green	<input type="checkbox"/>
Fast Track					<input type="checkbox"/>
PRIORITY REASONING (REQUIRED) *: Please provide professional reasoning for RAG RATING including any interim solution which will meet need in short term (NB: Any FAST TRACK rating will need to be sent to Localities/DFG Lead for authorisation in the first instance).					

REQUIREMENT DETAILS *									
Does the person have support from carers with the tasks relevant to this application?				Yes		<input type="checkbox"/>	No		<input type="checkbox"/>
Full Time Wheelchair User	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Part Time Wheelchair User	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Is the person likely to be using a wheelchair in the next 5 years?						Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If yes, please select all that apply			Indoor	<input type="checkbox"/>	Outdoor	<input type="checkbox"/>	Shower		<input type="checkbox"/>
If yes, please supply the external size and the weight of the wheelchair:									
Customer weight (please note stone & lbs OR kg)				Customer height (please note if feet and inches OR metres)					
PROPERTY INFORMATION *									
Parking Restrictions? If so, what? (E.g. pay and display, residents parking etc.)		Unable to park directly outside the property.				Is the property a New build?		<input type="checkbox"/>	
Type of Property		Bungalow		<input type="checkbox"/>	House	<input type="checkbox"/>	Flat		<input type="checkbox"/>
Type(s) of Adaptation *: If any of the requirements are not possible the installer/contractor is to discuss with the OT. Please delete adaptation rows that are not required.									
CHECKLIST FOR TYPES OF ADAPTATION: - Bathroom Adaptation – level access shower - Heating – removal of the radiator and vertical radiator to be installed - Other (please specify details)									
IMPORTANT: Please provide specific detail that you feel will benefit the contractor with their installation, (i.e. stronger on left or right for rail/control positions, breathing difficulties regards dust producing works, increased need to use toilet) but do not type the clients name in the sections below:									
Bathroom Adaptation				Specifics to be completed					
Thermostatically controlled push button (or other easy to use control) electric or mixer shower unit; longer length riser rail and standard length shower hose, unit to be positioned 1200mm above floor level.				Is shower to be used by individual or used by carer assisting (to aid with positioning controls) – carer assisted					
Level Access Floor Former Shower									
Step in shower tray, please note maximum tray height client could manage									
Shower Tray size (Min), consider future seating options				Size in millimetres 800 x 1000mm minimum					
Shower enclosure				Please state preference:					

Grab rails – fixed or drop down,	
Freestanding shower seat being supplied by OT	
Wall mounted shower seat, with back rest, arms and support legs.	
New WC	
Wash and dry toilet	
New Wash hand basin	
Changes to access door	
Room layout – possibly knocking WC and bathroom into one room, enlarge bathroom by moving internal wall or forming bathroom/WC in new area of property.	
Internal Door Adjustments? If other than bathrooms or kitchens or external access	Specifics to be completed
Door alterations, widening, convert to sliding, open opposite direction, remove internal timber thresholds	
External Access	Specifics to be completed
Garden	

Adaptation Estimated Cost

You are not expected to obtain quotations. Please simply use the indicative cost to populate the Estimate Cost box. This is to give the grant administrator an idea of the estimated total cost, and how close to the grant maximum the works are likely to be.

Adaptation Type	Indicative Cost	Estimated Cost
Bathroom Adaptation	£6,000	
Bathroom Adaptation – 2 rooms knocked into 1	£8,000	
Wash dry toilet seat (Bio bidet or AKW)	£1,100	
Wash dry toilet (i.e. Geberit)	£4,500	
Stair Lift – Straight, internal	£2,500	
Stair Lift – Straight, external (on existing steps, as long as not communal)	£4,800	

Stair Lift – Straight, external (new steps to be formed)	£14,800	
Stair Lift – Curved, internal	£6,500	
Stair Lift – Curved, external (on external steps as long as not communal)	£10,000	
Through Floor Lift, no extra building work	£15,000	
Through Floor Lift, with building works	£18,000	
Ceiling Track Hoist – Straight	£2,500	
Ceiling Track Hoist – Straight bariatric	£5,000	
Ceiling Track Hoist – H Track	£3,750	
Ceiling Track Hoist – H Track bariatric	£6,500	
Door Widening, internal door	£600 (per door)	Note how many doors
Door Widening, external door	£1,700	
Automatic Door Opening System on existing door mainly in blocks of flats	£4,000	
Automatic Door Opening System with new door mainly external doors	£5,300	
Automatic Window Opening System	£650 per window opening	Note how many windows
Kitchen	£14,000	
External Ramp – concrete (basic, door landing ramp, landing)	£7,000	
External Ramp – concrete (complex, multiple landings & ramps)	£14,000	
External Ramp - modular (basic)	£6,000	
External Lift Access	£25,000	
Sub Total		
Other Works (estimate cost)		
Estimated Grand Total		
Works over £30000?	Yes	No
If yes, customer can fund works over £30000?	Yes	No
Have you discussed moving to alternative accommodation?	Yes	No
If yes, what was the outcome		
If no, please put the customer works in priority order, or suggest where funding over £30000 is to come from?		

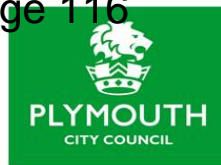
DECLARATION PLEASE READ CAREFULLY

- I declare that the information I have given is correct and complete, to the best of my knowledge and belief.
- I authorise the Council making enquiries to check the information I have given. This may mean contacting other Government agencies, my employer, or my accountant if I am self-employed.
- I understand that if I give false information or knowingly leave out information I may be prosecuted.
- I authorise the Occupational Therapy Service to provide Community Connections with any information on my disability/condition considered necessary to enable the determination of this grant application.
- I understand that submission of this form does not constitute a valid application until all relevant information has been received.
- I understand that I give permission in principle to the recommendations as discussed with the Occupational Therapist completing this form (the recommendations are subject to change and agreement with all parties).
- I understand that my landlord will have to give consent (delete if owner occupier)

Applicant Name		Signed		Date	
----------------	--	--------	--	------	--

Please send completed form to:

communityconnections@plymouth.gov.uk



Housing Grants, Construction and Regeneration Act, 1996

Part I: Chapter I Owner's Certificate

To Plymouth City Council:			
In connection with my application dated			
For a Disabled Facilities Grant in respect of Property address			
		Post Code	
I HEREBY CERTIFY that I [have] or [propose to acquire] a qualifying owner's interest in the dwelling intended for the application.			
I INTEND that the disabled occupant will live in the dwelling or flat as their only or main residence throughout the grant condition period (5 years for grants of £5,000 or less, 10 years for grants over £5,000) or for such shorter period as [my] [their] health or other relevant circumstances permit.			
Signed by all owners		Date	
Where the applicants have an owner's interest in the property specified in the application (i.e. the house or the dwelling within the building) are to be owned in accordance with the Occupation Certificate. Where there is a relevant disposal of part or all of the property within 10 years of the date of completion the Council may demand repayment of that portion of the grant which exceeds £5000 subject to a maximum repayment of £10,000. Full details of this condition are set out in Annex 4 of the Housing Assistance Policy 2011.			

**Housing Grants, Construction and
Regeneration Act, 1996**

Part I: Chapter I
Tenant’s Certificate

To Plymouth City Council:			
In connection with my application dated			
For a Disabled Facilities Grant in respect of Property address			
		Post Code	
I HEREBY CERTIFY that my application is a tenant’s application for a disabled facilities grant.			
I INTEND that the disabled occupant will live in the dwelling or flat as their only or main residence throughout the grant condition period or for such shorter period as [my] [their] health or other relevant circumstances permit.			
Signed by all tenants		Date	

Stair Lift Controls

Standard Joy Stick – Long



Ergonomic Joy Stick



Standard Joy Stick – Short



Arm Control – Paddle



Rocker Switch



Arm Control – Toggle



External Ramp:

- Gradient of the ramp will be 1:15.
- Maximum length of ramp will be 5m before landing is required.
- Minimum Clear width of 1200mm.
- Top and Bottom Landings of 1200mm x 1200mm.
- Landing provided at each change in direction (1200mm x 1200mm).
- Ramp and landings will have 100mm upstands.
- Bi-lateral metal railings will be installed where the drop is more than 600mm on both exposed sides.
- Rails will be 900mm high.
- Ramp and Landing Surface will be slip resistant.

This standard specification will be adhered to unless otherwise indicated and justified by the Occupational Therapist. Contractors will undertake full measured survey of the site and advise if ramp specification is not feasible.

For 1:15 Ramp	
Height of Steps (Rise)	Length of Slope (going)
100mm	1500mm
200mm	3000mm
300mm	4500mm
400mm	6000mm
500mm	7500mm

Selecting a Contractor on the grant applicant's behalf.

Plymouth City Council run a Dynamic Purchasing System (DPS) for all adaptation procurement (major adaptations), which means all contractors/providers are registered and compliant in regard to the work they undertake for our customers. All contractors/providers are TrustMark registered (see <https://www.trustmark.org.uk/> for more detail), and will provide the customer with an insurance backed warranty (2 years, extendable up to 5 years if grant applicant wishes to pay for this extension) for the work they undertake via the DPS. The customer will receive a leaflet about the service upon acknowledgement of this form.

Having PCC procure the work on the customers behalf means that other relevant legislation, e.g. Construction Design and Management Regulations 2015 is covered, and processes followed.

The works identified to meet the customers' needs will be placed on the relevant 'Lot', e.g. Lot 2 for Bathroom Adaptation with Design, and providers will be asked a series of questions relevant to the works, customer etc. and asked to submit a 'percentage adjustment bid' to our standard Schedule of Works. This information will determine the selected contractor/provider, who will be awarded the work following formal grant approval.

The contractor/provider will ask the customer to sign a contract. The contract for the works is between the customer and the contractor/provider NOT PCC.

If the customer has concerns or there are problems with the works, if the contractor/provider has been selected by PCC on the customers behalf, In.CIC and PCC will provide support to resolve the matter.

Should the customer choose to not utilise the DPS, they will be responsible for providing 3 quotations for the works, which must match your recommendations. The contractors they select must hold the relevant insurance. Please contact your allocated DFG officer to discuss this further.

If a family member undertakes the work, the cost of materials **only** will be covered. Where the customer selects their own contractors/provider or a family member undertakes the works, they must take full responsibility for the project and any subsequent issues. PCC will take no responsibility for these works.

In.CIC, or Independence Community Interest Company have been employed by PCC to produce and manage the Dynamic Purchasing System. They also offer a TrustMark registration scheme for adaptation specialists, and support PCC in ensuring compliance and quality of contractors/providers.

Construction Design and Management Regulations 2015.

The construction design and management regulations 2015 places a duty on domestic clients' who has construction work carried out on their home (construction work means any work that employs construction techniques, materials or equipment). CDM 2015 applies to adaptations.

PCC feel it unreasonable to expect the grant applicant to take this duty on and hence in most circumstances PCC will take the 'client role'. The only exception to this is when the grant applicant wishes to retain this duty, when the grant applicant does not want PCC to select the contractor or when an architect is employed.

The regulations places duties on all parties to give full consideration to the health and safety of those involved in the project and for future maintenance.

PCC will ensure the appropriate contractor/provider is selected (via the DPS), that they consider health and safety during the works (the construction phase plan), and provide required information for use and maintenance of the equipment (the Health & Safety file).

The works are not notifiable; however, the co-ordination role is important and a legal duty.

The grant applicant must agree to PCC undertaking this role by completion of the box within the form, or they must undertake this role themselves. PCC will check there is a construction phase plan and health and safety file before releasing grant payment.

Appendix C - Eligible works:

The adaptation works eligible for assistance will be those listed under section 23 (1) of the Housing Grants, Construction and Regeneration Act 1996, as follows:

Facilitating access to the home and garden

Where there is a need to remove or help overcome any obstacles which are preventing the disabled person from moving freely in and out of the property, including common parts, in and around the garden and any yard, outhouse or “other appurtenance” (e.g. a balcony or the land adjacent to the mooring of a qualifying houseboat).

Access might also include works outside the normal curtilage of the dwelling, such as a dropped kerb pavement crossing.

Eligible works to facilitate access to the home and garden may include, but are not limited to:

- Ramped access to the main entrance door for wheelchair use; widened or shallower steps to main entrance door or a step lift;
- Widened entrance door for wheelchair use;
- Path to entrance door;
- Alterations to secondary entrance door/patio window to provide access to rear garden/yard where access cannot reasonably be gained via the adapted main entrance and drive/side path;
- Installation of Platform Lift or Step Lift equipment.

In deciding the extent of providing access to the garden, the following will be taken into account.

- Grant assistance will not be given where there is already access to the garden but grant assistance may be given to improve an existing access to make it safe for the disabled occupant. It does not include extending an existing access e.g. creating a side access so a person can also go around the side of a house, nor to repair an existing surface.
- Grant assistance may be provided to allow access to an area of the garden but may not provide access to all areas of the garden.
- Generally, the most modest solution for providing access to both the house and the garden will be considered and this can mean that one access may be sufficient to access both the house and the garden.
- Where homes have communal gardens, e.g., blocks of flats served by a single access, grants will not normally be provided for an individual access to the garden unless it can be demonstrated that because of the disabled persons condition the travel distance to the garden would be excessive and unreasonable.

Making the premises safer

Eligible works to make the premises safer for the disabled person and other people living with them might include situations where:

- someone with challenging behaviours is hurting themselves, other people they live with or damaging the property;
- someone with impaired vision cannot safely navigate into and around their home or carry out everyday tasks and activities;
- someone with impaired hearing can't hear a standard smoke alarm; or

Access to the principal family room or bedroom

Where the disabled person is unable to access a room suitable for use as a living room or gain access to a room usable for sleeping. Or where the disabled occupant shares a bedroom with another person, they cannot access a room of sufficient size so that the normal sleeping arrangements can be maintained.

Eligible works for access to the principal family room or bedroom may include, but are not limited to:

- Widened doorway for wheelchair access;
- Provision and installation of stair lift/through-floor lift equipment and structural alterations required to allow installation, if the principal family room or bedroom is on an upper floor;
- Widened doorway in entrance hall to access principal family room or bedroom for wheelchair use;

Access to a toilet

Works eligible for assistance may include, but are not limited to:

- Provision of a toilet where one does not exist.
- Provision and installation of stair lift/through-floor lift equipment and structural alterations required to allow the installation, where access is required to a toilet above ground floor level;
- Strengthened ceiling and/or preparation works for ceiling track hoist, where hoist is to be provided by Plymouth City Council;
- Repositioning toilet to facilitate access by wheelchair user;
- Raised/lowered toilet pan;
- Provision of grab rails to assist with access to the toilet;
- Provision of ground floor toilet where upper floor cannot reasonably be accessed;
- Widened doorway for wheelchair access;

Access to a bath or shower

Where the disabled person cannot access a room with a bath and/or a shower or cannot use the existing bath and/or shower. In cases where the disabled person needs access to a bath and a shower, they would need to demonstrate a medical need for both.

Works which may be eligible for assistance include, but are not limited to:

- Provision and installation of stair lift/through-floor lift equipment and structural alterations required to allow the installation, where access is required to an existing bathroom above ground floor level;
- Provision of bath or shower for the first time;
- Provision of shower (thermostatically controlled) over a bath, including necessary curtain, tiles and grab rails;
- Replacement of bath with shower facility;
- Replacement of shower with a bath;
- Provision of bath and shower where there are 2 or more disabled occupants with differing needs;
- Relocation of bath/shower to facilitate use by wheelchair user;
- Strengthened ceiling and/or preparation works for ceiling track hoist, where hoist is to be provided by Plymouth City Council;
- Widened doorway for wheelchair access;
- Provision of fixed seat/grab rails;
- Safety flooring to create shower facility.

Access to a wash hand basin

A wash-hand basin will normally be provided in the same room as the WC.

Where the disabled person cannot access a room with a wash hand basin or cannot use the existing wash hand basin.

Works to provide access to a wash hand basin may include, but are not limited to:

- Relocation of wash hand basin to facilitate use by wheelchair user;
- Replacement of wash hand basin with more suitable type e.g. replace vanity unit with wall fixed wash hand basin;
- Replacement of taps with lever taps in association with above.

Facilitating the preparation of cooking of food

The extent of adaptation work in a kitchen should be related to the extent of cooking and food preparation normally undertaken by the disabled person.

Where the disabled person cannot access or does not have suitable facilities to prepare and cook food for themselves and others living with them.

Eligible works to facilitate the preparation of cooking of food may include, but are not limited to:

- Rearrangement of kitchen fittings/appliances to facilitate their use;
- Enlargement of the kitchen if it is too small to allow its safe use;
- Adapted work-top/storage units;
- Adapted doorway, e.g. for wheelchair user;
- Widened doorway, e.g. for wheelchair user;
- Raised height surfaces for appliances

Control of power, light and heat

Eligible works for the control of power, light and heat may include, but are not limited to:

- Relocating power points to make them accessible;
- Adaptation of heating/lighting controls to make them accessible;
- Replacement of solid fuel fire with other heating appliance in living/sleeping rooms normally used by a disabled occupant;
- Improvement of inadequate heating in living/sleeping rooms normally used by disabled occupant (People with limited mobility who remain in one room for long periods usually need a warmer home than able-bodied people);
- Provision of central heating.

Caring for others - Where the disabled person cannot move around the home to care for another person who normally lives there, whether they are related to the disabled person or not. This may include a spouse, partner or family member, another disabled person or a child. Importantly the dependent being cared for need not be disabled

Eligible works may include, but are not limited to:

- Provision and installation of stair lift/through-floor lift equipment and structural alterations required to allow the installation, where the disabled person lives on the ground floor but needs access to bedrooms;
- Widened doorways to bedrooms of those being cared for by disabled, wheelchair user;

Common parts

An application can be made to fund adaptations to the common parts of buildings containing one or more flats. This can include the structure and exterior of the building, routine parts of the building such as the front door and paths, as well as common interior areas of the building including emergency/fire exits, stairwells and passageways.

Under Section 36 of the Equality Act 2010 in England and Wales, landlords are required to make reasonable adjustments to the common parts of leasehold and commonhold homes, including hallways, entrances and stairs.

Appendix D - Discretionary Assistance Allocation (DAA) (Summary):

Discretionary Assistance	ILA Policy clause	Maximum amount	Owner Occupier	Tenant (incl. living with family)	Means tested
Discretionary Assistance Allocation (DAA) top-up of mandatory DFG	3.2	£30,000	Yes	Yes	Yes (for children's cases)
Moving on Grant	3.3	£15,000	Yes	Yes	No
Fast Track adaptations	3.4	£10,000	Yes	Yes	No
Works to allow the applicant to be discharged from hospital or Care facility, or; an individual is at risk of admission to an inpatient setting due to an unmet housing need	3.5	£10,000	Yes	Yes	No
Replacement stair lift or hoist	3.6	£10,000	Yes	Yes	No
Cleaning or clearance of a home to enable safe discharge from hospital	3.7	£5,000	Yes	Yes	No
Works for people with dementia, including colour and contrast decorating, carbon monoxide/cold/heat alarms, lighting, safety flooring, digital technology	3.8	£5,000	Yes	Yes	No
'Nil Grant' Application	3.9	N/A	Yes	Yes	No

Appendix E – Interim revisions to policy (date to be confirmed):**Lendology**

- To consider a means of loaning money to clients where necessary, Lendology is a Financial Conduct Authority (FCA) registered Social Enterprise Community Interest lender, that works in partnership with local councils. With funding provided by their Council Partners, Lendology lends funds to homeowners for a range of home repairs, improvements, adaptations, energy efficiency and renewable energy measures. The interest rate charged on the loans is agreed and set by the Council.
- The way the scheme works is that everyone living in Plymouth would receive the same interest rate, regardless of the loan amount, loan term or personal circumstances and the interest rate is fixed for the term of the loan. Lendology is currently used by Exeter City Council and others in the South West including Cornwall, Mid Devon, South Hams, Teignbridge & Torridge & West Devon. These schemes have been in operation since 2008, and the current interest rate for homeowners is set at 4% for these authorities.
- For homeowners, Lendology registers a Title Restriction at the Land Registry against the client's property. This means that if the homeowner looks to sell, re-mortgage or transfer ownership of the property, Lendology will be notified. This ensures that Lendology can ensure exceptional loan repayment rates. Most existing customers understand that Lendology are lending councils funds and its as such a fantastic rate they are happy to have the title restriction added. Should the person sell the property Lendology would expect to be repaid.
- Having supported existing Devon Partners for over 15 years with Disabled Facilities Grant top-up loans Lendology are confident that they would be able to provide an excellent service to Plymouth Council and its residents.

EQUALITY IMPACT ASSESSMENT – DISABLED FACILITIES GRANTS – COMMUNITY CONNECTIONS

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Stephen Evans – Major Adaptations Manager	Department and service:	Major Adaptations, Community Connections	Date of assessment:	28 July 2025
Lead Officer: Head of Service, Service Director, or Strategic Director.	Dave Ryland Head of Housing Standards	Signature:	D.Ryland	Approval date:	31 July 2025
Decision required:	<p>The Council has a statutory duty to approve mandatory Disabled Facilities Grants (DFGs) for major adaptations. This work helps people to live independently in their own homes, thereby helping to contain the potential increase in costs to Social Care Services.</p> <p>The legislation governing DFGs is the Housing Grants, Construction and Regeneration Act 1996. DFGs are mandatory and are available from Local Authorities in England and Wales, subject to a means test. The purpose of the Grant is to provide adaptations to the home environment to promote independence and allow people to remain in their own homes.</p> <p>Please note that this document is based on information from the 2021 UK census and hence DFG data has been updated since the previous Equality Impact Assessment.</p>				

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	Yes		No	x
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x

Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes	x	No	
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	N/A			

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
--	--	----------------	-----------------------	--------------------------------------

Age	<p>Plymouth</p> <ul style="list-style-type: none"> 16.4 per cent of people in Plymouth are children aged under 15. 65.1 per cent are adults aged 15 to 64. 18.5 percent are adults aged 65 and over. 2.4 percent of the resident population are 85 and over. <p>South West</p> <ul style="list-style-type: none"> 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none"> 17.4 per cent of people are aged 0 to 14. 64.2 per cent of people are aged 15 to 64. 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p> <p>Respondents aged '16-24' were <u>significantly</u> less likely to agree Plymouth's Sound is special to the city (71%) compared with those aged '25+' (89%-97%). (City Survey 2022)</p>	<p>Older people and younger people are recognised as potentially vulnerable groups.</p> <p>The DFG is means tested.</p> <p>Homes that cannot be adapted to meet the occupier's need.</p> <p>Owner occupiers are encouraged and supported to move to a more suitable home. Tenants are supported to find more suitable accommodation either via Community Connections or Devon Home Choice.</p> <p>Services offered in lieu of DFG – NIL Grant Application (please see Plymouth City Council Independent Living Assistance Policy 2025, section 3.9) with a fee of 1% of the cost of the works payable to Independence Community Interest Company (INCIC) for the use of the Dynamic Purchasing System (DPS) and a further 2.5% of the cost of the works payable to Plymouth City Council (PCC) to cover administration costs.</p>	<p>Advice for those with a means-tested contribution to make towards the cost of their DFG works.</p>	<p>Ongoing, Community Connections, Head of Housing Standards</p>
-----	--	---	---	--

<p>Care experienced individuals</p> <p>(Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>	<p>No adverse implications anticipated.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
--	--	---	------------------------	------------------------

Disability	<p>9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)</p> <p>Respondents with 'no limiting disability or health problem' (92%) were <u>significantly</u> more likely to agree with the statement Plymouth's Sound is special to the city than those who were 'limited a lot' (87%).</p>	<p>Limitations of the approved budget potentially result in some disabled people waiting for their adaptations. If the adaptations are considered eligible (e.g. following OT assessment and means testing) for grant funded works, they may have to wait.</p> <p>A prioritisation system is in place to ensure those most in need receive their adaptation soonest (please see Independent Living Assistance Policy 2025).</p>	<p>Continued monitoring of prioritisation process to ensure fairness and compliance by officers.</p> <p>Notification to customers of the anticipated wait time.</p>	Ongoing, Community Connections, Head of Housing Standards
Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans woman (2021 Census).	No adverse impact anticipated.	Not applicable.	Not applicable.
Marriage and civil partnership	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).</p>	No adverse impact anticipated.	Not applicable.	Not applicable.
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impact anticipated.	Not applicable.	Not applicable.

Race	<p>In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p> <p>Those identifying themselves as 'White' were <u>significantly</u> more likely to agree Plymouth Sound is special to the city (92%) compared with those identifying themselves as 'Any other ethnic group' (85%).</p>	<p>No impact anticipated.</p>	<p>Work with partners to promote services to the BME community.</p> <p>Review application rates from BME communities.</p> <p>Monitor the impact of promotion to BME communities.</p> <p>Policy and related documentation can be translated in to required language upon request via 'Translate Plymouth'. Publications for local information and marketing will be given to organisations using the most appropriate language. Organisations will be consulted on the most appropriate language and translation and other formats offered.</p> <p>Staff have been trained in Equality & Diversity and comply with the requirements.</p>	<p>Ongoing, Community Connections, Head of Housing Standards</p>
-------------	---	-------------------------------	---	--

Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>No adverse Impact.</p> <p>Small number of applicants from minority religions identified.</p>	<p>Work to promote services to minority groups.</p> <p>Review application rates from BME communities.</p> <p>Monitor the impact of promotion to BME communities.</p>	Ongoing, Community Connections, Head of Housing Standards
Sexual orientation	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p> <p>Respondents identifying as 'Heterosexual / Straight' (92%) were <u>significantly</u> more likely to agree with the statement Plymouth Sound is special to the city than those who identified as Bisexual / Gay / Lesbian (86%).</p>	No adverse impacts anticipated.	<p>Work with partners to promote services to Minority community.</p> <p>Review application rates from Minority communities.</p> <p>Monitor the impact of promotion to Minority communities.</p> <p>Staff have been trained in Equality & Diversity and comply with the requirements.</p>	Ongoing, Community Connections, Head of Housing Standards

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>Disabled Facilities Grant are aimed at improving health and safety within the home. This will help reduce hospital admissions and reduce the risk of admission to residential care.</p> <p>The Disabled Facilities Grant is contained within the Independent Living</p>	Not applicable.	Not applicable.

	<p>Assistance Policy 2025, which is written in line with the Equalities Act 2010. It therefore adheres to the UN Convention of the Human Rights as part of UK law.</p> <p>Plymouth City Council recognises Article 14 of the Human Rights Act – The right to receive Equal Treatment and prohibits discrimination including sex, race, religion and economic and social status in conjunction with the Equalities Act which includes age and disability.</p> <p>All staff and service users will be treated fairly, and their human rights will be respected.</p> <p>No adverse impact on human rights has been identified.</p>		
--	---	--	--

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to: <ul style="list-style-type: none"> promote equality, diversity and inclusion facilitate community cohesion support people with different backgrounds and lived experiences to get on well together 	No adverse impacts anticipated.	Not applicable	Not applicable.
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	Not within scope of the Independent Living Assistance (ILA) policy.	Not applicable.	Not applicable.

Build and develop a diverse workforce that represents the community and citizens it serves.	<p>All staff and service users will be treated fairly, and their human rights will be respected.</p> <p>No adverse impact on human rights has been identified.</p>	Not applicable.	Not applicable.
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.	<p>Disabled Facilities Grants are mandatory means tested grants, with no targeted intervention within communities. DFG is applicable to all tenures of housing.</p> <p>Mandatory grant is available to those with specific living requirements due to disability in relation to the home environment. The grant is available city wide and is means tested, therefore is targeted towards those who are unable to fund adaptations via their own funds.</p>	Not applicable.	Not applicable.

This page is intentionally left blank

Independent Living Assistance (ILA) Policy Review 2025

Project details

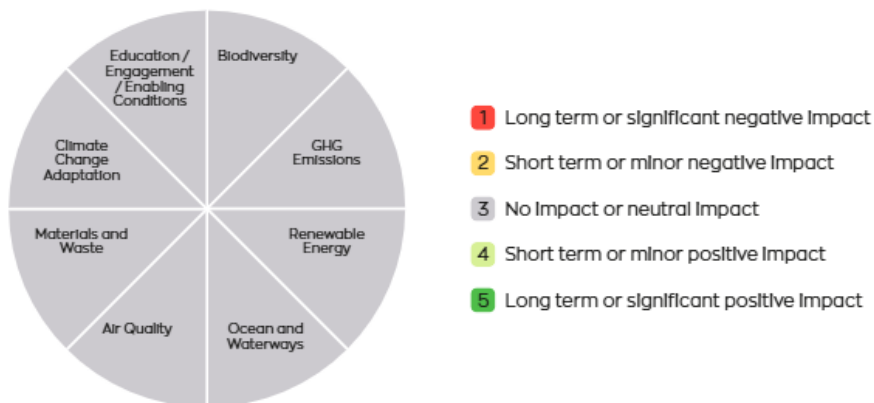
Assessment author

Stephen Evans

Project summary

Review of the ILA Policy for the delivery of Disabled Facilities Grants (DFG)

Summary of assessment



Assessment scores

Biodiversity

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

GHG Emissions

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Renewable Energy

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Ocean and Waterways

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Air Quality

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Materials and Waste

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Climate Change Adaptation

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

Education / Engagement / Enabling Conditions

Score

(3) No impact or neutral impact

Score justification

Works are limited to single dwellings and hence neutral impact anticipated.

This page is intentionally left blank

EXECUTIVE DECISION

made by a Council Officer



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL COUNCIL OFFICER

Executive Decision Reference Number – **COD05 25/26**

Decision	
1	Title of decision: Variation number 76 of contract PEO 16175 to allow for payment Rough Sleeping Prevention and Recovery Grant (RSPRG) Funding for 2025 -2026
2	Decision maker: Gary Walbridge (Strategic Director for Adults, Health and Communities)
3	Report author and contact details: Jackie Kings (Head of Housing Solutions) Jackie.Kings@plymouth.gov.uk
4a	Decision to be taken: <ol style="list-style-type: none"> 1. To vary contract PEO 16175 to allow for payment of £1,416,568 RSPRG (Rough Sleeping Prevention and Recovery Grant) for 2025-2026. 2. To allocate MHCLG RSPRG grant funding of £306, 517 to PCC as set out in the report, to deliver specialist service interventions as an integral part of the system response with the Plymouth Alliance and wider partners.
4b	Reference number of original executive decision or date of original committee meeting where delegation was made: The Cabinet decision on 11 March 2024 delegated the award of future contract variations up to the value of £3 million per variation, as a result of Grant funding (including, but not limited to, RSI and SSMTRG) within the period of the contract to the Strategic Director in consultation and agreement with the Cabinet Member for Housing, Cooperative Development and Communities and the Cabinet Member for Health and Adult Social Care.
5	Reasons for decision: MHCLG provides annual funding that is ringfenced and must be used to deliver agreed service interventions to single homeless and those who are rough sleeping. Plymouth City Council is part of the Plymouth Alliance and delivery of the services via this grant has previously been approved by the Council.
6	Alternative options considered and rejected: Not deliver the programme – Rejected as delivery of this programme of work has been agreed by the Ministry of Housing, Communities and Local Government and the Plymouth Alliance.
7	Financial implications and risks: The £1,723,085 grant allocation for the financial year 2025-26 is 100% revenue and will be used to fund service interventions in the Plymouth Alliance, which PCC is a part of. The activity described will support prevention relief of homelessness and support management of significant costs related to the statutory response to homelessness. Financial risk is minimised as this is funded revenue activity.

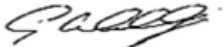
8	Legal Implications and risks: (for completion by Legal Officers)			
9a	Is the decision a Key Decision? (please contact Democratic Support for further advice)	Yes	No	Per the Constitution, a key decision is one which:
			x	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total
			x	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1million , annually
			x	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.
9b	If yes, date of publication of the notice in the Forward Plan of Key Decisions			
10	Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:	Plymouth Alliance will specifically target priorities: Working with the Police to tackle crime and anti-social behaviour, keeping children, adults and communities safe, working with the NHS to provide better access to health, care and dentistry. It will work to enhance the provision of public services, it will be trusting and engaging with communities, will focus on prevention and early intervention, spending money wisely, will engage and empower staff, and will be a strong voice for Plymouth		
11	Please specify any direct environmental implications of the decision (carbon impact)	N/A		

Urgent decisions

12a	Is the decision urgent and to be implemented immediately in the interests of the Council or the public?	Yes		(If yes, please contact Democratic Support for advice)
		No	X	(If no, go to section 13a)
12b	Reason for urgency:			
12c	Scrutiny Chair signature:		Date	
	Scrutiny Committee name:			
	Print Name:			

Consultation

13a	Which Cabinet Member's portfolio does this decision relate to?		Councillor Chris Penberthy (Cabinet Member for Housing, Cooperative Development and Communities)	
13b	Date Cabinet Member consulted		12/08/2025	
13c	Are any other Cabinet members' portfolios affected by the decision?	Yes	X	
		No		(If no go to section 14)
13d	Which other Cabinet member's portfolio is affected by the decision?		Councillor Mary Aspinall (Cabinet Member for Health and Adult Social Care)	
13e	Date other Cabinet member(s) consulted		12/08/2025	
14	Has any Cabinet member declared a conflict of interest in relation to the decision?	Yes		If yes, please discuss with the Monitoring Officer
		No	x	
15	Which Corporate Management Team member has been consulted?	Name		Gary Walbridge
		Job title		Director for Adults, Health and Communities
		Date consulted		30/06/2025
Sign-off				
16	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)		JS29 25/26
		Finance (mandatory)		OW.25.26.026
		Legal (mandatory)		IW-11.07.25 4990
		Human Resources (if applicable)		
		Corporate property (if applicable)		
		Procurement (if applicable)		
Appendices				
17	Ref.	Title of appendix		
	A	Variation number 76 of contract PEO 16175 RSPRG Payment Report		
	B	Equalities Impact Assessment		
Confidential/exempt information				
18a	Do you need to include any confidential/exempt information?		Yes	If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for

		No	x	publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below.				
		Exemption Paragraph Number						
		1	2	3	4	5	6	7
18b	Confidential/exempt briefing report title:							
Background Papers								
19	Please list all unpublished, background papers relevant to the decision in the table below. Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.							
Title of background paper(s)		Exemption Paragraph Number						
		1	2	3	4	5	6	7
Council Officer Signature								
20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not. For further details please see the EIA attached.							
Signature			Date of decision		23 September 2025			
Print Name	Gary Walbridge (Strategic Director for Adults, Health and Communities)							

PASSPORTING THE ROUGH SLEEPER PREVENTION AND RECOVERY GRANT (25/26) TO THE PLYMOUTH ALLIANCE – COMMUNITY CONNECTION AND COMMISSIONING



I. EXECUTIVE SUMMARY

Plymouth City Council receives funding from the Ministry of Housing, Communities and Local Government (MHCLG) to ensure the delivery of services to single homeless individuals and couples, including those with a history of, or at risk of rough sleeping. The Rough Sleeping Initiative (RSI), allocated by the Government from 2022-2025, aims to combat rough sleeping as part of a broader strategy to address homelessness and enhance services for those at risk.

Since 2018, Plymouth City Council has annually received RSI funding and collaborated with the MHCLG Rough Sleeper Advisory Team and the Plymouth Alliance to develop a comprehensive approach to preventing and supporting homelessness and rough sleeping.

The Labour government has extended the Rough Sleeper Initiative funding until March 2026, renaming it Rough Sleeper Prevention and Recovery Grant (RSPRG) and incorporating the Accommodation for Ex-Offenders (AFEO) grant. Plymouth City Council will receive the same allocation in 2025/26 as in 2024/25 for both RSI and AFEO. Encouragingly, the Government has indicated plans to consolidate local authority homelessness funding streams into one multi-year settlement starting from April 2026.

RSI Funding Allocations:

2022/23: £1,652,240

2023/24: £1,581,352

2024/25: £1,512,851

AFEO Funding Allocations:

2023/24: £210,234

2024/25: £210,234

For 2025/2026, the RSPRG grant funding allocation is **£1,723,085** (£1,512,851 (RSI) and £210,234 (AFEO) combined).

Plymouth City Council is allocated £306,517 of this to deliver specialist service interventions as an integral part of the system response with the Plymouth Alliance and wider partners.

Funded Interventions 2025/2026:

Service Intervention/ Delivery	Funding
Adult Safeguarding Specialist	£52,000
Adult Social Care Specialist	£53,902
Local and Supported Lettings	£185,000
Multi-Agency Rough Sleeping Team (MARS)	£195,000

Navigators/Saturday Opening Day Centre	£173,000
Sleep Safely/Hamoaze Utility Costs	£187,000
RSI Technical Support	£66,469
Somewhere Safe to Stay (SS2S) and Primrose House	£423,834
Homelessness Support Service	£89,431
Youth Homelessness Intervention Specialist	£44,715
Hospital Discharge Worker	£42,500
Accommodation for Ex-Offenders – Targeted Support	£210,234
Total Committed Spend	£1,723,085

These interventions are part of a systemic approach to provide pathways out of homelessness and rough sleeping, ensuring comprehensive support and services.

This paper sets out the purpose and utilisation of the grant funding in line with Plymouth City Council governance.

2. BACKGROUND

Plymouth City Council receives funding from the Ministry of Housing, Communities and Local Government to offer specialist services to single homeless individuals and couples, including those with a history of rough sleeping or those at risk of it.

The Rough Sleeping Initiative (RSI) was allocated by the Government to local authorities from 2022-2025 to combat rough sleeping as part of a broader strategy to address homelessness and enhance services for those who are homeless or at risk.

Since its first application in 2018, Plymouth City Council has annually received RSI funding and has collaborated with the MHCLG Rough Sleeper Advisory Team and the commissioned Plymouth Alliance to create and implement a comprehensive approach to preventing and supporting those who are homelessness and/or rough sleeping.

In 2021, Plymouth City Council worked closely with MHCLG colleagues and The Plymouth Alliance to develop a three-year system offer aimed at reducing homelessness and rough sleeping.

Plymouth City Council, in collaboration with the Plymouth Alliance, has used this funding to provide a systemic approach alongside broader Alliance services and partners, offering pathways out of homelessness and rough sleeping wherever possible.

The Labour government was elected and came into power on the 4th July 2024. MHCLG extended most of the homelessness funding streams to local authorities to March 2026.

The Rough Sleeper Initiative (RSI) funding was renamed the Rough Sleeper Prevention and Recovery Grant (RSPRG) and includes the Accommodation for Ex-Offenders grant into this allocation.

Plymouth City Council will receive the same allocation in 25/26 as in 24/25 for both RSI and AFEO

	2022/23	2023/24	2024/25	2025/26 RSPRG
--	---------	---------	---------	---------------

RSI	£1,652,240	£1,581,352	£1,512,851	£1,723,085
AFO	0	£210,234	£210,234	
TOTAL	£1,652,240	£1,581,352	£1,723,085	£1,723,085

The service interventions are delivered by organisations who form part of the Plymouth Alliance. The Alliance Leadership Team (ALT) comprises of senior leaders from the following organisations.

Plymouth City Council
 Harbour Drug and Alcohol Service
 The Zone
 PATH
 BCHA
 Hamoaze
 Livewell
 Shekinah

As part of the governance arrangements the ALT have approved the following service interventions for 25/26. It should be noted that this is a continuation from 24/25 and not new service delivery

Lead Organisation	Service Intervention	RSPRG
<u>PCC</u> Adult Safeguarding Specialist	A dedicated complex needs social worker based in the Adult Safeguarding Team attached to The Alliance and homelessness services	£52,000
<u>PCC</u> Adult Social Care Specialist	This hybrid role will provide outreach and enable timely assessment and access to support as required. This role will work across homelessness and rough sleeper services, and work closely with Alliance and rough sleeper services, as well as the Health Inclusion Pathway Plymouth (HIPP) service.	£53,902
<u>PATH</u> Local and Supported Lettings	The service works with landlords to support people in sustaining and maintaining tenancies. This work complements and adds to the commissioned Private Rented Access Scheme delivered by the Alliance, providing Deposit Guarantees and access to wider funds and support.	£185,000
<u>PATH</u> Multi agency rough sleeping team (MARS)	The MARS team provide intensive support to individuals who have a long history of rough sleeping. The team have very low caseloads to enable the level of support that is required.	£195,000

<u>SHEKINAH</u> Navigators / Saturday opening Day Centre	Navigators work intensively with individuals who have a history of homelessness and rough sleeping to support them through their homelessness journey and linking in with specialist services to ensure the right support at the right time to enable move through to accommodation. This funding means that this service is extended to Saturday morning also.	£173,000
<u>BCHA</u> Sleep Safely	Sleep Safely is a night shelter with 8 self-contained bunk rooms which each have their own door and 4 individual self-contained pods in the courtyard area.	£187,000
<u>PCC</u> RSI Technical Support	Provides strategic oversight of homelessness/ rough sleeping pathways to ensure the operational and strategic links are in place to provide best for customer pathways and services.	£66,469
<u>BCHA</u> Somewhere Safe to Stay (SS2S) and Primrose House	SS2S provides 20 rooms and has 24-hour support available. Primrose provides 10 rooms with 24 hour supported houses	£423,834
<u>PCC</u> Homelessness Support Service	The Homelessness Support Service is made up of two Community Connections Officers providing Homelessness Reduction Act (HRA) duties and applications ensuring equity of access to statutory duties under the Act for those experiencing rough sleeping.	£89,431
<u>PCC</u> Youth Homelessness Intervention Specialist	This service provides prevention and early intervention support to young people who are most at risk of rough sleeping and homelessness	£44,715
<u>BCHA</u> Hospital Discharge Worker	This is an additional post located with the team at Derriford and adds capacity to support and manage discharge where there is a risk of homelessness/rough sleeping.	£42,500
<u>PATH</u> TASS	This funds a Targeted Accommodation Support Service (TASS) for those moving away from the criminal justice system and vulnerable to homelessness/rough sleeping	£210,234

An Executive Decision paper has been drafted to:

Allocate the ongoing MHCLG RSPRG funding to the activity as set out in this paper

3. ALTERNATIVE OPTIONS

There are no alternative options as delivery of this programme of work has been developed in agreement with funder (Ministry of Housing, Communities and Local Government) .

4. FINANCIAL IMPLICATIONS AND RISK

The grant allocation is 100% revenue and will be used to fund service interventions.

The activity described will support prevention and relief of homelessness and support management of significant costs related to the statutory response to homelessness

Financial risk is minimised as this is funded revenue activity.


5. TIMESCALES

The services are currently being delivered as they are a continuation of the previous year (24/25) delivery.

This page is intentionally left blank

EQUALITY IMPACT ASSESSMENT – VARIATION NUMBER 76 OF CONTRACT 16175:
THE ROUGH SLEEPING PREVENTION AND RECOVERY GRANT PAYMENT

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Ruth Tune-Holmes	Department and service:	Community Connections	Date of assessment:	13 th May 2025
Lead Officer: Head of Service, Service Director, or Strategic Director.	Jackie Kings	Signature:		Approval date:	16 th June 2025
Overview:	<p>Plymouth City Council receives funding from the Ministry of Housing, Communities and Local Government to ensure the delivery of services to single homeless individuals and couples, including those with a history of, or at risk of, rough sleeping. The Rough Sleeping Initiative (RSI), allocated by the Government from 2022-2025, aims to combat rough sleeping as part of a broader strategy to address homelessness and enhance services for those at risk.</p> <p>Since 2018, Plymouth City Council has annually received RSI funding and collaborated with the MHCLG Rough Sleeper Advisory Team and the Plymouth Alliance to develop a comprehensive approach to preventing and supporting homelessness and rough sleeping. In 2021, a three-year strategy was developed to reduce homelessness and rough sleeping.</p> <p>Plymouth City Council, in collaboration with the Plymouth Alliance, has used this funding to provide a systemic approach alongside broader Alliance services and partners, offering pathways out of homelessness and rough sleeping wherever possible with a particular focus on meeting the needs of those experiencing multiple disadvantage and those prison leavers who are often the furthest away from services</p> <p>The Labour government has extended the Rough Sleeper Initiative (RSI) funding until March 2026, renaming it Rough Sleeping Prevention and Recovery Grant (RSPRG) and incorporating the Accommodation for Ex-Offenders (AFEO) grant.</p> <p>Plymouth City Council will receive the same allocation in 2025/26 as in 2024/25 for both RSI and AFEO.</p>				

	For 2025/2026, the RSPRG grant funding allocation is <u>£1,723,085</u> (£1,512,851 (RSI) £210,234 (AFEO))
Decision required:	<p>To vary contract PEO 16175 to allow for payment of £1,416,568 RSPRG (Rough Sleeping Prevention and Recovery Grant) for 2025-2026.</p> <p>PCC to be allocated £306, 517 from the RSPRG Grant to deliver specialist service interventions as an integral part of the system response with the Plymouth Alliance and wider partners</p>

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	Yes		No	x
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes		No	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	The RSPRG funds services that explicitly work to have positive equality, diversity and social inclusion impacts. All services support people experiencing multiple disadvantage. The Plymouth Alliance has a range of interventions which support greater social inclusion. This includes gender and age specific services.			

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Age	<p>Plymouth</p> <ul style="list-style-type: none">• 16.4 per cent of people in Plymouth are children aged under 15.• 65.1 per cent are adults aged 15 to 64.• 18.5 percent are adults aged 65 and over.• 2.4 percent of the resident population are 85 and over. <p>South West</p> <ul style="list-style-type: none">• 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64.• 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none">• 17.4 per cent of people are aged 0 to 14.• 64.2 per cent of people are aged 15 to 64.• 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p>	Where necessary older residents will be referred to Adult Social Care and young people to specialist services	Not needed	Ongoing, Community Connections

<p>Care experienced individuals</p> <p>(Note that as per the Independent Review of Children's Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>	None	Monitoring of lettings and related services to those who are care experienced	Ongoing, Community Connections
<p>Disability</p>	<p>9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)</p>	None some individual may require medical and social care and/or accessible housing and services	Partnership with health and social care is in place that provides a dedicated and specialist service	Ongoing, Community Connections

Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans women (2021 Census).	None. If participants fall within this category; existing support services will be made available	Not applicable	Not applicable
Marriage and civil partnership	40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married. 0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).	None	Not applicable	Not applicable
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	None	Not applicable	Not applicable

Race	<p>In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p>	None, there is potential for those from minoritised communities to feel isolated and to be the target of racism and hostility	We are seeking to address the potential for isolation and racism as part of wider Council strategy.	Ongoing, Community Connections
Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth's population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>None</p> <p>Plymouth has a population from a range of diverse national backgrounds. There are two Mosques offering prayer and other facilities. There are also a number of shops with halal provision.</p> <p>There are numerous churches in Plymouth that have a congregation from a range of diverse national backgrounds.</p>	This will be monitored through letting arrangements	Ongoing, Community Connections
Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	None, there are gender specific homelessness services	Lettings will be monitored	Ongoing, Community Connections

Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).	None. If participants fall within this category, existing support services will be made available	This will be monitored through the letting process and partnership working	Ongoing, Community Connections
---------------------------	---	---	--	--------------------------------

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>Homeless individuals have the same rights of protection as everyone else under the terms of the Human Rights Act 1998. The Equality Act 2010 places a duty on us to:</p> <p>Eliminate unlawful discrimination, harassment, victimisation</p> <p>Advance equality of opportunity between those with a protected characteristic and others</p> <p>Improved housing and support provision will evidence that we are committed to improving the quality of life for all in our city.</p>	Delivery of the service interventions through the Plymouth Alliance to work closely with this homeless population	2025/26 Community Connections

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to: <ul style="list-style-type: none">▪ promote equality, diversity and inclusion▪ facilitate community cohesion▪ support people with different backgrounds and lived experiences to get on well together	Ensure that the Plymouth Alliance, which the Council is a part of, works closely together to promote E, D, I policies, procedures and practices in its day-to-day service delivery with the homeless and rough sleeping cohorts.	The Council commissions and is part of the leadership of the Plymouth Alliance	2025/26 Community Connections
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	Care experienced individuals are a proportion of this homeless cohort	Specific services and interventions to be developed	2025/26 Community Connections
Build and develop a diverse workforce that represents the community and citizens it serves.			
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.			