

## **Manchester City Council Report for Resolution**

**Report to:** Health Scrutiny Committee - 4 September 2024  
Executive - 11 September 2024

**Subject:** Disabled Facilities Grant (DFG)

**Report of:** Executive Director of Adult Social Services

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### **Summary**

The delivery of home adaptations to Manchester residents, to help them live independently and safely in their own homes, needs to change due to a combination of challenges, including:

- significantly increasing demand
- ongoing financial constraints
- increasing waiting time for residents to receive a service
- inconsistency of quality across private, housing association and council tenures

A new delivery model was agreed by Major Contracts Board in October 2023 to bring all major adaptations work previously undertaken by lead Registered Providers (RPs) back in-house. This model will be fully in place in September 2024 and provides a stable foundation for the operation of the adaptations service across Manchester.

Due to an accumulation of the DFG grant because of the pause in delivery during the Covid Pandemic for non-urgent works we were able to use our discretion to top up works such as extensions to support better outcomes and better quality of life for some of the most vulnerable residents.

However, the greatly increased demand in Manchester of recent years, means that the Disabled Facilities Grant (DFG) budget for 2024/25 is committed already. There is insufficient allocated budget to meet the non-discretionary elements of activity, so it is critical that we adapt our overall approach. Due to the increase in demand, there are already waiting lists for major adaptations and the need to also delay assessments - work is unlikely to start within 12 months and often needs will have changed by the time the works are due to commence.

To attempt to ensure that the limited DFG budget can be used to benefit those most in need, certain changes are proposed to deliver more equitable provision. The changes bring MCC back into line with comparator authorities across England and align activity to the national guidance. A full breakdown of the populations served by the service has been undertaken and an Equality Impact Assessment. These proposals may adversely affect some of our residents and the mitigating options are being explored.

Health Scrutiny Committee and Executive are therefore asked to consider and support the following proposed changes to this framework.

**Recommendations**

The Health Scrutiny Committee is asked to endorse the recommendations to the Executive.

Executive is recommended to:

- (1) Approve the reintroduction of means testing for adults seeking adaptations through the Disabled Facilities Grant (DFG).
- (2) Revert to a DFG limit capping funding for individual cases at £30,000, in line with Government guidance, with discretionary payments beyond this to be considered by the Executive Director of Adult Social Services, only in exceptional circumstances, and in consultation with the Director of Children's Services where appropriate.

**Wards Affected: All**

<p><b>Environmental Impact Assessment</b> -the impact of the issues addressed in this report on achieving the zero-carbon target for the city</p>	<p>None</p>
<p><b>Equality, Diversity and Inclusion</b> - the impact of the issues addressed in this report in meeting our Public Sector Equality Duty and broader equality commitments</p>	<p>A full breakdown of the populations served by the service has been undertaken and an Equality Impact Assessment. These proposals may adversely affect some of our residents (for example, means testing would affect around 3%) and the mitigating options are being explored. MCC has been respected for attempting to provide a comprehensive and generous service without financial barriers. However, it should be noted that the proposed measures revert to the previous policy position in MCC in 2016, and one that is very much in line with other cities and Greater Manchester authorities, and with the legislative standard.</p> <p>As part of the EIA, we have carried out consultation with numerous service user/stakeholder representatives. These include; Breakthrough UK, Carers Manchester Network, Manchester Deaf Centre, Manchester</p>

	Parent/Carer Forum, The SPACE Group, South Manchester Down's Syndrome Support Group, Greater Manchester Autism Group, and Starling. The feedback was broadly positive, in that common adaptations will be delivered promptly and that service users will regain their independence.
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<b>Manchester Strategy outcomes</b>	<b>Summary of how this report aligns to the Our Manchester Strategy/Contribution to the Strategy</b>
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	Adapted homes will enable disabled residents to live independently and remain economically active.
A highly skilled city: world class and home grown talent sustaining the city's economic success	<i>Manchester has significant numbers of people employed in the direct delivery and supply chains that support adaptations of homes</i>
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	Adapted homes will enable disabled residents to live independently and remain economically active.
A liveable and low carbon city: a destination of choice to live, visit, work	<i>Adapted homes support Manchester residents to live independently within their communities</i>
A connected city: world class infrastructure and connectivity to drive growth	<i>Adapted homes help residents to connect effectively to their communities and the infrastructure in the places they live</i>

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

### **Financial Consequences – Revenue**

None

### **Financial Consequences – Capital**

Government Grant settlements are unlikely to change in the foreseeable future. These changes will help to ensure that disabled adaptations are generally delivered in line with government guidance for timescale and quality.

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**Background documents (available for public inspection):**

None.

## **1.0 Introduction**

- 1.1 The Major Contracts Board agreed in October 2023 to establish a new delivery model for home adaptations, bringing services previously undertaken by Registered Providers (RP) back under the responsibility of MCC, through the Manchester Equipment & Adaptations Partnership (MEAP). This model will be fully in place in September 2024 and provides a stable foundation for the operation of the adaptations service across Manchester.
- 1.2 However, there has been increased demand in recent years and financial constraints, which mean that the Disabled Facilities Grant (DFG) budget for 2024/25 is committed already. There is insufficient budget to meet the non-discretionary elements of activity, so it is critical that we adapt our overall approach. There are already waiting lists for major adaptations and the need to also delay assessments - work is unlikely to start within 12 months and often needs will have changed by the time the works are due to commence.
- 1.3 In this context, it is imperative that we act to introduce additional measures to protect the most vulnerable residents and to manage the financial framework for the DFG.
- 1.4 We are now in the position where we need to make a decision with regard to the future use to ensure fair and equitable distribution of the budget.

## **2.0 Background**

- 2.1 The DFG is allocated annually to Local Authorities by the Government as part of the Better Care Fund. It is ring-fenced within this as a capital grant. Its primary function is to fund the provision of major adaptations. DFG funds the provision of home adaptations to help children and adults with disabilities to live as independently and safely as possible in their homes.
- 2.2 Home adaptations are changes to the fabric and fixtures of a home to make it safer and easier to get around, and for everyday tasks like cooking and bathing. Adapting a home environment can help restore or enable independent living, privacy, confidence and dignity for individuals and their families.
- 2.3 Adaptations can include the installation of stair-lifts, level access showers and wet-rooms, wash and dry toilets, ramps, wider doors, and, in some instances, bespoke home extensions to existing dwellings as well as improvements to access to and from gardens. Heating systems, insulation and telecare and assistive technology (where it is capital) can be other forms of adaptation according to Government guidance issued in 2022.
- 2.4 DFG is delivered in two forms; mandatory grants, as prescribed in the 1996 Housing Grants Act; and as discretionary grants, as defined by MCC's Home Improvement Assistance Policy (introduced by the Regulatory Reform Order 2002).

2.5 In 2023/24, MCC approved 1,437 assessments of need in total for individual residents for DFG including:

ADULTS – 1,358 assessments of need

- 1,734 total adaptations
- 430 stairlifts/through floor lifts
- 749 wet rooms/level access showers
- 123 ramps
- 66 extensions/ground floor facilities

CHILDRENS – 79 assessments of need

- 119 total adaptations
- 10 stairlifts/through floor lifts
- 24 wet rooms/level access showers
- 4 ramps
- 12 extensions/ground floor facilities

### 3.0 Main issues

#### *Allocation of DFG Funding*

3.1 DFG allocations from the Government have increased over recent years and in cash terms are over three times the value they were ten years ago. The Covid pandemic had a massive impact on delivery and allowed a ‘top-up’ allocation to increase the apparent overall funding available. At the same time however, the volume, complexity and cost of adaptations have increased even more drastically – which leaves the current position of demand and delivery needs outstripping income by a large factor. Any allocated grant not spent in the financial year is rolled forward to the next financial year.

Year	Govt Grant £m	Top Up £m	RP Contributions £m	Total £m	Spend £m	Under/Over Spend £m	Comments
2015/16	2.967		0.490	3.541	3.541	0	
2016/17	5.746		0.411	6.157	4.606	-1,551	Underspend due to 47% increase to DFG
2017/18	6.337	0.675	0.671	7.683	6.899	-0.784	Underspend 68% grant increase from 15/16/level
2018/19	6.928	0.878	0.517	8,323	8.190	-0.133	Underspend 82% increase from 15/16 level
2019/20	7.476		0.460	7.936	7.997	0.061	Pre-covid year
2020/21	7.476	1.007	0.127	8.610	3.921	-4,689	Underspend due to Covid lockdown
2021/22	8.483		0.287	8.770	8.346	-0.424	Underspend due to Post covid lockdown
2022/23	8.483		1.014	9.497	13.066	3,569	Overspend funded from grant and contribution reserves
2023/24	8.483	0.740	1.046	10.269	14.000	3,731	Overspend funded from grant and contribution reserves

3.2 The Government grant settlement for Manchester in 2024/2025 is £9.253m. This is in line with last year’s initial allocation and top up (£9.223m). In addition, there is an expectation of circa £3m in the form of residual contribution reserves and contributions within the new year from social

housing landlords towards the cost of works. This will exhaust all additional resources and will still result in a potential funding shortfall of between £2.75m and £3m, based on current costs and demands. It is therefore necessary to impose a limit on DFG expenditure, as outlined above, and to ensure that income is maximised, in the form of means tested contributions from those who qualify.

- 3.3 The budget for 2024/25 is close to being committed already for the financial year. Officers will need to keep waiting lists for major adaptations and delay assessments, as work is unlikely to start within 12 months and needs will have changed by the time the works are due to commence. This poses a risk to vulnerable people awaiting an adaptation who may wait longer which could impact on their health and well-being as well as increasing pressures on their families and carers. This may lead to carer breakdown and increases in packages of care/residential care (particularly for children), and increased costs for Health and Social Care budgets.

#### *Impact on Waiting times*

- 3.4 There are two different elements to the waiting times issue with different legal implications; the waiting time for a full DFG application to be approved, and the waiting time for works to start/be completed.
- 3.5 The published DFG guidance for Local Authorities (2022) states that works should start (really be completed) within a 6-month timeframe. However, this is only guidance and is not legally enforceable. This is what central Government and Foundations, the Government appointed independent advisory agency, ask LAs to work towards. Work can only commence when cases are reached, within the context of being mindful of avoiding a budgetary overspend.
- 3.6 As it currently stands a complete DFG application is when the case is submitted for approval, once all the paperwork is complete, permissions obtained and quotes for work are on file. Approval must be done within 6 months of receiving the full completed application as per the Housing Grants, Construction and Regeneration Act 1996 (Chapter 53, Part 1, Chapter 1, section 34) that a local authority shall by notice in writing notify an applicant for a grant as soon as reasonably practicable and, in any event, not later than 6 months after the date of the application concerned whether the application is approved or refused.
- 3.7 Cases are now taking almost the full 6 months for approvals due to the size of the current waiting list. The current waiting list as at 1 August 2024 stands at 664 Assessment of Needs (898 adaptations) with an approximate value of £5,852m.

Adults – 625 Assessments of Need (823 adapts) approx value £4.936  
Childrens – 39 Assessments of Need (75 adapts) approx value £916k

- 3.8 Due to the pressures on the budget it is highly likely that the team will need to stop placing orders at some point this year to stay within budget and this will

push a large number of cases awaiting approval over 6 months, as well as the waiting time for works to start. This presents risks of legal challenges.

### *The proposed Policy Changes*

#### **(a) Means Testing**

- 3.8 The Foundations agency supports means testing to target funding on households with high levels of need. It does note the advantages in aligning the social care and DFG means tests or exploring options of establishing electronic links to Housing Benefit; a new formula for housing costs based on Local Housing Allowance; and updating the passporting benefits.
- 3.9 The introduction of means testing across all tenures is estimated to affect approximately 3% of applicants (this equates to 43 people out of 1,437 for 2023~24), who would then have to contribute towards the cost of works. The total amount calculated as a contribution is approximately £275k - £300k per year (across all tenures). Currently only owner-occupiers/private tenants are means tested where works are adding value to the property.) For children, the means test that applies to adults does not apply.
- 3.10 In terms of impact, reintroducing means testing for all tenures would mean those who can afford to pay for adaptations are asked to do so and so will have a negative impact on some (although this may be mitigated by other options detailed in the next section.) It will have a positive impact more generally on all residents by focusing better use of DFG on those who most need it. The means test determines whether a person could raise the money for their contribution, meaning they do not necessarily have to have the money to hand immediately but would be able to get a loan for that amount. The parameters for the means test are set by central Government.
- 3.11 In addition, the holistic nature of MEAP's service means that when means are tested, the assessment will also look at an individuals' welfare rights position, and this was something that was particularly welcomed by community representatives. The financial assessment will offer the opportunity to offer an even greater holistic solution to the health and wellbeing of clients, and will be able to help with issues like:
- Benefit entitlement checks
  - Social isolation
  - Debt advice
  - Energy advice.

#### **(b) Limiting funding to the £30,000 mandatory ceiling**

- 3.12 Manchester and most other Local Authorities only deal with a small number of large and complex adaptations every year, where the cost of fully meeting the needs of the disabled person exceeds the current limit of £30,000.

In 2022/23 there were 43 out of 803 cases where the cost was over £30,000.



28 of these were adults at a cost of £1,269,275.  
 15 were for children at a cost of £1,432,000.  
 This figure refers to owner occupiers or private rentals.

In 2023/24 there were 40 cases over £30,000  
 24 of these were adults  
 16 were children

**Figures for 22/23:**

11 extensions over £30k. 3 under (Registered Providers only)

**Figures for 23/24:**

14 extensions over £30K. 7 under (Registered Providers only)

- 3.13 However, the time taken to support these cases and to find the extra funding can be considerable. The Government’s Foundations agency recommends that the £30,000 limit remains in place.
- 3.13 A change is proposed that brings Manchester into line with national guidance and the policies of comparator Local Authorities (see below). The proposal is that MCC returns to the previous position of only awarding mandatory grant of £30,000, removing the up to automatic £100,000 discretionary top up.
- 3.14 This would mean that it would no longer be possible to provide extensions and may admittedly result in marginal increases where facilities do not adequately support a resident in their home. However, in exceptional circumstances, a discretionary decision may be taken at Director level, where residential care would be the only alternative.
- 3.15 Previous data indicates this would only impact on a small number of cases though the impacts on each will be considerable. The EIA found... As an example, only 31 of the 803 total grants approved in 2022/23 were for amounts over £30,000. Please see table below detailing the number of grants over £30,000 for the last five years.

Year	Number
2019-2020	15
2020-2021	9
2021-2022	15
2022-2023	31
2023-2024	40

- 3.16 It is proposed that MCC will prioritise mandatory grants which will significantly reduce the awarding of discretionary grants (discretionary grants address disrepair that impacts on health and assists hospital discharge e.g. no heating/hot water, damp, mould for owner-occupiers.) It admittedly can enable independent living and mitigates against hospital readmission but in

terms of equity, it may favour certain tenures as these grants can only be awarded to owner-occupiers and private rented tenants (any disrepair issues in social rented housing should be addressed by the landlord).

#### *Risks of retaining the current policy*

- 3.17 If these changes are not made the risk is that older and disabled people across the city will not receive major adaptations in a timely manner and will wait longer for their major adaptation – resulting in more widespread loss of independence, an increase in admissions to hospital, and additional strain on carers. Means testing allows for a more equitable application of the grant and will release additional funding for the completion of more adaptations.
- 3.18 Without making such changes, MEAP would have a shortfall of £7.5m in capital funding in 2024-25 to deal with the waiting list and to ensure waiting times are at 6 months or less.
- 3.19 From 2025-26 there is expected to be additional demand equivalent to £2m per year to keep waiting times to 6 months or less. This is based on the increase in the number of requests and the increasing costs during the last few years. We are intending to make representations to Government for an increase in allocation to meet this demand.

#### *Examples of relevant policy in other Core Cities and Inner London Boroughs*

- 3.20 This section outlines the approaches and policies of other Local Authorities in Core Cities, London Boroughs and Greater Manchester. The overwhelming majority have a policy of means testing and constraining the grant to the £30,000 limit:

#### **Leeds**

*You may have to pay for or contribute towards the cost of work in your house. We will check how much money you are eligible for based on your income and any benefits you receive. We call this a financial means test.*

*It is the Council's primary responsibility to deliver Disabled Facilities Grants and control the budget accordingly to ensure its statutory duties are met in a timely manner. However, if the budget allows, the Council may decide they have sufficient resources to entertain applications for discretionary aid. The Council reserves the right to inform applicants, at any given time, it is not entertaining applications for discretionary money due to financial pressures on the Disabled Facilities Grant budget. Some common examples of the use of discretionary funding include:*

- *funding/part funding with costs associated with moving house*
- *funding/part funding to cover an individual's statutory means tested contribution*

*When the cost of the scheme exceeds the £30k grant cap the customer may wish apply for a loan to bridge the shortfall in funding. There can be several factors why customer may not be able to afford their contribution and may wish to access a loan. This may be because a customer may not being able to fund their contribution following the government's Test of Resources or because the scheme costs exceed the DFG limit of £30k, as examples.*

## **Birmingham**

*Disabled Facilities Grants play an important role in supporting disabled citizens to secure necessary adaptations for their homes. However, there is a statutory maximum on the sum payable. Currently, the maximum is £30,000. It is sometimes the case that necessary adaptations cost more than the statutory limit. The power to provide discretionary assistance over the statutory maximum value is, therefore, an important mechanism to avoid disabled citizens going without necessary adaptations when this has been assessed and agreed as being the best course of action.*

*Where the cost of an extension exceeds £10,000 Birmingham City Council will apply a land charge to the homeowner's property in line with current valuations for a maximum of 10 years.*

*If the Priority Needs Assessment is submitted for consideration for a mandatory grant, you will be contacted to progress your application, including a means test if applicable. As part of the process this could include a survey to confirm that your property is suitable for the proposed works (reasonable and practicable), if your property is deemed as not suitable, this will be discussed with you.*

## **Sheffield**

*In 2023, Sheffield City Council agreed a revised policy framework, namely: All major adaptations will be means tested for adults and delivered as a mandatory Grant up to the value of £30K with a discretion by the Director of Adult Health and Social Care to increase the Grant from £30k to £50k in individual circumstances.*

*People who are assessed under the means test will have a contribution to pay. People on passported benefits will not have a contribution to pay. Children's adaptations cannot legally be means tested and due to this, this policy decision does not affect children.*

*Scrutiny of the budget usage would be provided to each Committee so that an assurance is provide regards application of the policy.*

## **London Borough of Southwark**

*You will not have to pay anything towards costs. Our Housing Adaptation Team (HAT) will carry out works based on the recommendations.*

*You may be entitled to a Disabled Facilities Grant (DFG) to pay towards adaptations. The maximum grant is £30,000.*

*If you are a disabled person in receipt of any pass-porting benefits, you will be eligible for 100% of the grant. The grant cannot be given until our Occupational therapy service has recommended that your home needs to be adapted.*

*The grant is means-tested for people aged over 19, so some people may have to pay a contribution towards the required work.*

*If you're not a council tenant and not eligible for the Disabled Facilities Grant, you will need to pay for the adaptations yourself. A financial counsellor from our Home Improvement Agency can help you decide how to do this. You can still use our approved contractors, but there will be a charge for the service.*

### **London Borough of Lambeth**

*How much is the grant for? The amount paid is based on a financial assessment (a means test) of your average weekly income in relation to your outgoings. There is no means testing for families of disabled children under 19.*

*Capital is included in the means test and will take into account savings above £6,000. Certain benefits, including Personal Independence Plan (PIP) and Income Support, are generally ignored. If you have a partner, your combined income will be assessed jointly.*

*The amount of financial assistance offered can vary from nothing to 100% of the cost.*

*At the moment, the maximum grant is £30,000. In exceptional cases, a top-up discretionary disabled facilities grant might be available. Discretionary cases are considered by a panel consisting of officers from within Housing, Regeneration and Environment and Adult and Community Services. Your HIA case manager will be able to advise you further.*

### **London Borough of Newham**

*Nationally there is a maximum grant limit to Disabled Facilities Grants of £30,000 for adults, Newham Council can in certain circumstances offer a discretionary top-up grant where works exceed the maximum Disabled Facilities Grant limit. The maximum grant amount awarded to children in Newham is £45,000. The amount awarded to you may range from no grant, up to the maximum grant limit towards the cost of the work. The grant awarded will depend on the outcome of the financial assessment (means test) and the value of the work required.*

*All Disabled Facilities Grants (with the exception of grants for children under 18 and in Newham provision of Ceiling Track Hoists) are subject to a financial*

*assessment according to law. The financial assessment determines how much (if anything) you will have to pay as a contribution towards the cost of the work. The Financial Assessment takes into account your and your partner's income and savings. You will be asked to provide proof of your and your partner's income and savings.*

*The following can be used as a guide: • If you have an income or joint income after tax of up to £11,000 with savings below £6,000 - there is a good chance that you will not need to make a contribution to the cost of the works. • If you have an income or joint income after tax between £11,000 and £20,000 with savings below £6,000 - the contribution you make will start from a few pounds and possibly rise to around five thousand. • If you have an income or joint income after tax above £20,000 with savings below £6,000 - the contribution you make will possibly rise rapidly from five thousand to tens of thousands.*

### **London Borough of Islington**

*The person with the disability must remain in the property for five years, unless their health causes them to move or the grant repaid. This applies only if the grant exceeds £5000 (the amount to be repaid would be such part that exceeds £5,000 and not in excess of £10,000).*

*The grant works must be completed within six months from approval or the grant may be withdrawn.*

*Please consider all options before proceeding with the grant. Should you cancel the grant at a late stage you may incur charges for any surveying, administration or contractor fees.*

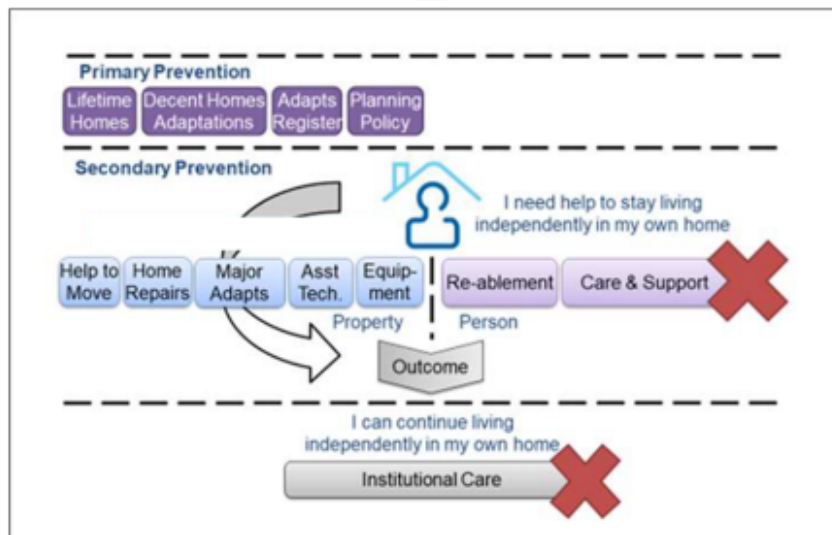
*If the adaptations exceed £10,000 the Grants Team will inform you and check if you qualify through the benefits you receive or carry out a 'means test' to advise if you have to contribute any funds towards the works.*

*The grant will contribute reasonable cost for adaptations only recommended by the Occupational Therapist, up to a maximum grant of £30,000.*

#### *Wider evidence of effective prevention / cost avoidance*

- 3.21 A number of national and local evaluations demonstrate the benefits of delivering adaptations to individuals.
- a. **The Centre for Ageing Better** has reported that installing home adaptations and undertaking home repairs to reduce falls on stairs, can lead to
    - Savings of £1.62 for every £1 spent, and a payback period of less than eight months.
    - Overall savings of at least £500m each year to the NHS and Local Government social care services in the UK through a 26% reduction in falls, which account for over four million hospital bed days each year in England alone

- b. **The Building Research Establishment's** cost benefit model shows the potential effects of home adaptations and hazard mitigation suggesting a Return on Investment of 62% in terms of notable impact on falls prevention. The preventative nature of adaptations provides cost saving benefits to the wider health and social care system. For example:
- Recipients of a DFG avoid a care home placement by 4 years.
  - Home assessment and modification for people at high risk of a fall offers a return on investment of £3.17 to every pound spent; and a social return on investment of £7.34 to every pound spent.
  - In later life modifications made to the home can reduce difficulties with activities of daily living by 75%.
  - A holistic home intervention with lower income adults experiencing difficulties with several activities of daily living, which combined reablement support, repairs, and home adaptations, found participants' physical functioning increased by 49%, depressive symptoms improved in 53% and difficulty with activities of daily living reduced by 75%.
- c. **MCC's Better Outcomes, Better Lives** programme has noted the centrality of adaptations to the whole health system – the Health Scrutiny Committee in June 2022 confirmed:
- that MEAP and the Community Alarms & TEC (CATEC) Team have a key role in ensuring the delivery of Adult Social Care's TEC ambitions. These ambitions are highlighted within the Better Outcomes, Better Lives programme.
  - Supporting people to achieve their best outcomes and remain as independent as possible is always at the forefront of every intervention the service delivers. This is directly aligned to achieving the aims of the Better Outcomes, Better Lives transformation programme and the Our Manchester Strategy to develop a strong preventative offer. This is illustrated in the following diagram:



#### 4.0 Recommendations

1. Due to the significant challenges on the allocated Disabled Facilities Grant (DFG) to meet increasing demand, we are now in the position where we need to seek approval to reintroduce means testing for adults seeking adaptations through the DFG to ensure fair and equitable use of the available budget.
2. Revert to a DFG limit, capping funding for individual cases at £30,000 in line with Government guidance to ensure equitable provision for citizens, with discretionary payments beyond this to be considered by the Executive Director of Adult Social Services only in exceptional circumstances and in consultation with the Strategic Director of Children's Services where appropriate.

#### 5.0 Appendices - none

