

Slough Borough Council

Report To:	Cabinet
Date:	Monday 20 th November 2023
Subject:	Contract Award for the Supply and Installation of Stairlifts
Lead Member:	Cllr Wright- Adult Social Care, Mental Health and Learning Disabilities Cllr Kelly – Education & Children's Services
Chief Officer:	Marc Gadsby - Executive Director - People – Adults
Contact Officer:	Jane Senior - Associate Director People Strategy and Commissioning Vicky Tutty - Group Manager People Strategy
Ward(s):	All
Key Decision:	YES
Exempt:	Part exempt – Appendix 2 is exempt as it contains the following category of exempt information as specified in Paragraph 3, Schedule 12A of the Local Government Act 1972, namely: “Information relating to the financial or business affairs of any particular person (including the authority holding that information)”
Decision Subject To Call In:	YES
Appendices:	Appendix 1 Equalities Impact Assessment Appendix 2 EXEMPT Pricing

1. Summary and Recommendations

This report seeks approval to award a contract for the supply and installation of stairlifts. The contract will be for a period of three years plus two optional extensions of one year each subject to satisfactory performance. This will be via direct award to Handicare Accessibility Limited through the Eastern Shires Purchasing Organisation (ESPO) Framework Agreement and will commence in January 2024. The contract will be funded through the Disabled Facilities Grant with a total contract value of up to £1M over the potential 5-year contract term.

Recommendations:

Cabinet is recommended to:

1. Approve the award of the contract to Handicare Accessibility Limited for the supply and installation of stairlifts funded through the Disabled Facilities Grant (DFG) for a period of three years plus two optional extensions of one year, subject to satisfactory performance through the ESPO Framework. The total value of this contract will be up to £1M over the potential 5-year contract term.
2. Delegate authority to the Executive Director for People (Adults) in consultation with the Section 151 Officer and the Lead Member for Health, Social Care and Wellbeing to enter into the contract with Handicare Accessibility Limited.

Reason:

To ensure that stairlifts can be installed in a timely fashion for those who are eligible, in keeping with the Council's statutory duties and Housing Assistance Policy 2022-27.

Commissioner Review

The Commissioners are content with the recommendations in this report.

2. Report

Introductory paragraph

In September 2023, Cabinet approved the procurement forward plan, including authority to commence procurement for this contract.

This report sets out the results of the direct award and evaluation process and recommends contract award to the successful supplier to supply and install stairlifts.

This provision of stairlifts contributes to the following objectives contained with the Slough Corporate Plan 2023-27:

A town where residents can live healthier, safer and more independent lives

The increase in adaptations completed will assist more people to live more independently at home.

Options considered

The provision of stairlifts via the DFG is a statutory function, the Council has to make provision for this service.

Options	Pros	Cons
<p data-bbox="252 297 384 331">Option 1</p> <p data-bbox="252 353 560 510">Single procurement exercise for each stairlift as per current arrangements.</p> <p data-bbox="252 533 539 566">Not recommended</p>	<p data-bbox="587 394 906 506">No clear advantage to retaining current arrangements.</p>	<ul data-bbox="1034 297 1337 1962" style="list-style-type: none"> <li data-bbox="1034 297 1337 454">• Current arrangements lead to delays and waiting lists. <li data-bbox="1034 459 1337 616">• Current arrangements have led to complaints. <li data-bbox="1034 620 1337 777">• Higher costs of purchasing stairlifts on a spot basis <li data-bbox="1034 781 1337 848">• Inefficient use of officer time. <li data-bbox="1034 853 1337 1962">• Does not address waiting time concerns raised within the Public Interest Report by the Local Government and Social Care Ombudsman (LGSCO) published on 13th September 2022. <i>‘Ms X complained the Council has delayed in providing a disabled facilities grant (DFG) for a stairlift at her property. As a result Ms X has been unable to access the first floor of her property independently for over a year.’</i>

<p>Option 2</p> <p>Utilise the call off option through the ESPO Framework for the supply and installation of stairlifts through a direct award to a sole supplier</p> <p>Recommended</p>	<ul style="list-style-type: none"> • Streamline the service which will result in reduced waiting lists and waiting times. • Efficient installation times • Lower cost per stairlift installed (efficiency savings) • Reduced work pressure for Occupational Therapist Team (OTs) and DFG team • This will ensure that the Council is compliant with a key recommendation included in the public interest report written by the local ombudsman. 	<ul style="list-style-type: none"> • Due to the efficiency realised through this contractual arrangement, the supply and installation of stairlifts is likely to increase demand and spend (see risk section).
<p>Option 3</p> <p>Open Tender</p> <p>Not recommended</p>	<ul style="list-style-type: none"> • Opportunity to test the market. 	<ul style="list-style-type: none"> • A framework is already in place which has competitive prices and regular benchmarking is carried out to ensure the prices are competitive. • The Framework ensures providers are meeting national quality standards for stairlifts.

		<ul style="list-style-type: none"> • Additional time upon council resources to put together a procurement exercise.
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Option 2 is considered the most suitable option for securing efficient supply and installation of stairlifts.

Background

2.2 In November 2022, Cabinet approved the new Housing Assistance Policy (HAP) detailing the Disabled Facilities Grant (DFG) options that an individual can receive. One of the key aspects of the policy was in fast tracking certain types of equipment, such as stairlifts. This report is for approval to have a sole provider to supply and install the stairlifts to improve the service and decrease waiting times.

2.3 A recommendation from the Public Interest Report and Cabinet Report was to review the policy taking account of new non-statutory guidance. Selecting a sole supplier to supply and install stairlifts will have a positive impact on the waiting times for residents who have been assessed as needing a stairlift.

2.4 In September 2022 a Public Interest Report by the Local Government and Social Care Ombudsman (LGSCO) was written regarding a complaint made to Slough Borough Council Adult Social Care, Independent Living Team (DFG Team). This complaint was upheld and one of the recommendations from the report was to immediately end the DFG Minor works waiting list and process applications for all those on the waiting list in line with the statutory timeframes. Stairlifts come under Minor works and this contract will bring the stairlift waiting times within the statutory timeframes. Summary of the complaint below:

Local Government and Social Care Ombudsman Investigation into Complaint about Slough Borough Council (Reference Number 21 017 018)

Mrs X complained the Council had delayed in providing a disabled facilities grant (DFG) for a stairlift at her property. As a result Mrs X had been unable to access the first floor of her property independently for over a year.

Approval to go out to tender

2.5 The authority to commence procurement for this contract was sought via the procurement forward plan which was approved by Cabinet on 18th September 2023.

The Procurement Process

2.6 The procurement for the new services has been conducted in line with the Public Contracts Regulations 2015 and the council's Contract Procedure Rules with assistance from Procurement and HB Public Law.

2.7 Slough Borough Council signed up to a National Framework for the provision of Stairlifts, Step lifts, Vertical through-floor stairlifts, and Hoists managed by the Eastern Shires Purchasing Organisation (ESPO). Procurement through this framework agreement is a fully compliant public procurement route and it is available to all local authorities in England to use at no charge to the authority. All suppliers on the framework meet the required quality standards and vetting process.

Provider Engagement

2.8 From the framework only two suppliers/manufacturers were able to provide this service to Slough.

2.9 The Group manager for Occupational Therapist and the Independent Living Team alongside the Adult's Commissioner met with both Handicare Accessibility Limited and Supplier B to provide information on the requirements of the service and expected outcomes and KPIs.

2.10 As Handicare Accessibility Limited was unknown to the Council, a workshop was held to demonstrate the equipment that would be installed and supplied. This was not required of Supplier B as they are known to the Council.

Approval to award

2.11 Advice sought from Procurement is that we can utilise the call off option through the ESPO Framework for the supply and installation of stairlifts through a direct award to a sole supplier.

2.12 This will be a direct award, as the prices are published and the reason for selection is based on the provider being the most economical advantageous supplier.

2.13 The Pricing schedule on the Framework is showing Handicare Accessibility Limited as being the most economical advantageous supplier. Please see Exempt Appendix 2 for further detail on pricing.

2.14 Whilst the procurement was authorised via the Procurement forward plan approval is being sought from Cabinet to contract award.

Preparation for the next stage

2.15 Further to approval of the recommendation to award the contract, commissioners will work with the successful supplier to finalise the KPIs and enter into a contractual agreement.

Contract Monitoring

2.16 Adult Social Care will continue to monitor the usage of the budget and DFG through regular budget monitoring meetings to ensure that sufficient funds are available to meet the Council's statutory duty to provide DFGs. Adult Social Care will be monitoring the demand and budget and will prioritise urgent cases to deliver and install within 4 weeks.

2.17 The contract will be managed by the OT manager and Independent Living Team who will meet with the provider quarterly to review performance against the KPIs and budget management. The provider will send through weekly installation reports to the OT manager.

2.18 The KPI metrics will be mainly based on response times as quoted within the ESPO Framework, this will ensure all stairlifts are supplied and installed within 20 working days of quote being approved. The KPIs will include initial contact to made with client within 72 hours of referral. The performance rate will be set at 95% of cases within agreed timeframes. This will be monitored through the monthly install reports and quarterly monitoring reports. The Council will include clauses within the contract to ensure that the necessary steps can be taken if the provider does not deliver to due to poor performance, such as ending the contract.

3 Implications of the Recommendation

3.1 *Financial implications*

3.1.1 The agreed budget for the whole Disabled Facilities Grant (DFG) this year 2023-24 is £1,412,000 including £272,000 of slippage from 2022-23, with slippage representing 19% of the funding available for 2023-24. This budget is included within the Capital Programme and is funded by the Department of Levelling up, Housing and Communities within the Better Care Fund budget. At this stage we do not have details of the 2024-25 allocation from government, although it is expected that there will be no change from the 2023-24 allocation. This funding is ring-fenced for funding adaptations for eligible residents. This includes all the works and adaptations provided through this grant, The budget for stairlifts contract will be coming from the overall DFG budget.

3.1.2 The project will be fully delivered through the DFG Capital Programme with no cost implications for the General Fund.

3.1.3 There is potential for the level of spend to exceed the contract sum, dependent upon the volume of applications and would be met from the DFG, Historically, the DFG has demonstrated a material underspend against the funding allocation as demonstrated by the 2022-23 slippage, therefore, there

may be scope for increased demand to be contained within the overall funding available. If demand outstrips available funding for the year, demand will have to be met by compensatory saving in Adult Social Care.

3.1.4 All cases within the DFG service will be split into works, major works and minor works, the stairlifts will be part of the minor works caseload and will be in chronological order of receipt of enquiry, however urgent cases would be prioritised and all caseloads will need to be met from approved budgets

3.1.5 The prices from the stairlifts on the EPSO Framework are competitive, and the costs are lower than the DFG service purchasing them on an individual basis; this may result in the Council being able to support more residents with the same budget. The Council will be purchasing stairlifts as and when the client has been assessed and the provider has gone to visit the client and property. The provider will supply a quote for the supply and installation as sometimes minor adjustments or electrical/plumbing works may need to take place in order for the stairlift to be installed and used safely this would be included in the quote.

3.1.6 Mandatory DFG will be subject to a means test in accordance with the regulations made under The Housing Grants, Construction and Regeneration 1996 Act, as amended. This will include stairlifts. The Council will review the income collection processes to ensure that contributions are being properly levied and collected.

3.1.7 In cases where Adult Social Care clients who refuse the equipment due to their required contributions but are assessed and deemed high risk, the Housing Assistance policy allows the Council to consider levying the charge. This will be on a case-by-case basis at the discretion of the Council's Director of Adult Social Care whilst ensuring all expenditure is within approved budgets.

3.1.8 Adult Social Care budget holders will continue to monitor and manage usage of the grant on a regular basis.

3.1.9 The contract sum is £200,000 per annum, total contract value of £1,000,000, over 5 years.

Contract length would be 3 years including two 1-year extensions (3+1+1)

The current spend from 1st April to September 23 is £133,745 this also included the backlog of cases from the previous year. The backlog was build-up of cases and now with the introduction of a new policy and team structure the process is streamline.

3.2 *Legal implications*

The Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) places a statutory duty on Local Authorities to help qualifying disabled people for home adaptations. These works (called eligible works) must be considered "necessary and appropriate" to meet their needs and "reasonable and practical" regarding the age and condition of the property. These are called Disabled Facilities Grants (DFGs).

3.2.2 As well as these mandatory grants, Local Authorities also have the general power under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (the RRO) to develop local Housing Assistance Policies which give assistance for home repairs, improvements, and adaptations for the purpose of improving living conditions for residents.

3.2.3 Local authorities have a duty to support and meet the needs of disabled residents living within their borough. The responsibilities for adult social care are set out:

- for adults in the Care Act 2014
requires local authorities to identify, provide and arrange services, facilities and resources to prevent, delay or reduce the needs of individuals either for care or support. This includes the adaptation of properties
- for children in Part 3 of the Children Act 1989,
- section 2 of the chronically Sick and Disabled Person's Act 1970.

places a duty to assist disabled children and young people 'in arranging for the carrying out of any works of adaptation in their home or the provision of any additional facilities designed to secure their greater safety, comfort or convenience' (Section 2). This duty arises where the authority has assessed the need for the specific adaptations.

3.2.4 Funding for this assistance is provided via ring fenced funding through the Better Care Fund (BCF) which combines money from health and social care budgets to deliver health and care services. Use of ringfenced DFG funds must only be used for the specific purpose of funding adaptations for disabled people who qualify for a Disabled Facilities Grant made under the 1996 Act or the RRO.

3.2.5 Procurement via the Eastern Shires Purchasing Organisation (ESPO) National Framework for the provision of Stairlifts, Step lifts, Vertical through-floor stairlifts, and Hoists is a lawful procurement route under regulation 33 of The Public Contracts Regulations 2015. The Framework is current, the Council is identified as a potential contracting party, the supplies and installation works are in scope under the Framework, and Procurement have assured that the council has complied with the Framework rules for a direct award contract all off. Therefore the council can enter into the contract with Handicare Accessibility Limited.

3.3 *Risk management implications*

The table below sets out the risks associated with the proposed course of action and the mitigating actions.

Risk	Probability	Impact	Mitigation
Cost of lifts increase	Low	Medium	Costs on the Framework will be fixed for the duration of the contract term
Increased demand on the DFG service for stairlifts.	Medium	Medium	<p>Demand is client-led so could increase. There are mechanisms within the legislation to support budget management if demand outstrips available funding. (non-urgent case could take up to 36 weeks. These timescales are part of the government guidance to local authorities) Source: Disabled Facilities Grant - Frequently Asked Questions (foundations.uk.com).</p> <p>Adult Social Care will continue to monitor usage of the grant through regular budget monitoring to ensure that sufficient funds are available to meet the Council's statutory duty to provide DFGs. Section 9 of the HAP advises how the Council can manage the budgetary control of the Grant.</p>
Reduced demand	Low	Medium	Reduction in demand for lifts could increase care package requirements, therefore the overall impact on the Council could be more significant.
Poor performance outcomes	Low	Medium	Regular contract monitoring will ensure delivery of required KPIs. There will be clauses in the contract terms and conditions covering breaches and under-performance.

3.4 *Environmental implications*

3.4.1 There are no environmental implications.

3.4.2 Stairlifts can only be recycled with the permission of the resident. In these cases if a client passes away or moves into a different care setting, the stairlift can be re-used. The Council can re-use the equipment with another client, the provider will only charge for safely dismantling the stairlift and again for installation and any new parts if necessary. The purchase of the stairlift includes 5-year warranty and service costs.

3.5 *Equality implications*

3.5.1 An Initial Equalities Impact Assessment (Appendix 1) highlights that there is no adverse impact on the nine protected characteristics, the recent monitoring shows that the main recipients of stairlifts are those adults and children with disabilities, frail older people (over 85) and women are over-represented in the user group, so a streamlined service provision will particularly benefit these groups. The proposed decision will advance equality of opportunity by permitting residents with disabilities or physical limitations

due to age to live a more independent life and have full access to their property.

3.5.2 The HAP policy includes types of assistance support elements to support clients who are assessed and deemed high risk but refuse the equipment due to the client needing to pay a means-tested contribution. This will be on a case-by-case basis.

3.6 *Procurement implications*

3.6.1 Slough used a national framework to direct award with a supplier, which meets procurement regulations as the framework has fixed prices for each provider and allows Slough to find the best and most economical supplier who can supply and install in Slough.

Date	Milestone Detail
02/10/2023	Sign up to the ESPO Framework
02/10/2023	Discussions with approved Stairlift suppliers
22/11/2023	Complete Tender Evaluation award (Direct Award)
08/01/2024	Contract start

3.7 *Workforce implications*

3.7.1 There are no workforce implications

3.8 *Property implications*

3.8.1 There are no property implications

4. **Background Papers**

None.

Appendix 1: Equality Impact Assessment

Directorate: People Strategy & Commissioning People (Adults)	
Service: People (Adults) / Adult Social Care	
Name of Officer/s completing assessment: Ashfaq Hussain	
Date of Assessment: 25/09/2023	
Name of service/function or policy being assessed: Disabled Facilities Grant (DFG) Stairlift contract	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>The purpose of this Equality Impact Needs Assessment is to assess the possible effects of Slough Borough Council introducing a sole supplier for stairlifts to be supplied and installed.</p> <p>This contract is solely for residents living in private housing and housing associations.</p> <p>The Council process for residents wanting to apply for stairlifts has not changed, the main purpose of the contract is to streamline the procurement aspect of finding a provider to supply and install stairlifts. The process is to gather three quotes from similar providers and evidence why the team has selected the provider to install the stairlift, this is mainly around value for money. This process is very time consuming and previously the lead times for stairlifts were up to one year.</p> <p>With the introduction of selecting a sole supplier this will reduce the waiting times. The outcome will be that residents would be getting their stairlifts within a reasonable time frame and within government guideline times.</p> <p>This contract will not negatively impact on any group of people from a protected characteristic. In addition, there are levels of support that can also be offered (subject to funding and budget availability) to help assist residents who require a stairlift and is deemed to be high risk but does not continue as they may have to pay contributions towards the stairlifts.</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The delivery of this service will be carried out by the Independent Living Team (ILT) and Long-Term Occupational Therapy (OT) teams within Adult Social Care.</p> <p>The OT team will assess each individual and recommend if they are eligible for the grants. The OT team alongside the ILT team will work and oversee the work until completion. The OT team will make sure the stairlift work is completed to the OT recommendations.</p>

3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.

Recipients of the DFG could potentially comprise all equality groups, but particularly those with a disability and those who are elderly.

Adults and Children (anyone who is eligible for the disabled facility grant)

We currently do not hold large amounts of data of people requesting stairlifts through the Disability facility grant, however the information below is from residents who have had a stairlift installed over the last 6 months.

Age:

Age Range	Residents
18 to 24	0
25 to 34	0
35 to 44	1
45 to 54	0
55 to 64	1
65 to 74	6
75 to 85	3
85+	11
Total	25

Disability:

Client Category	Total
Carer	0
Dementia	0
Learning Disability	0
Mental Illness	0
Other Vulnerability	4

Physical Disability	4
Physically Frail/Temporary Ill	17
Visual Impairment	0
Grand Total	25

Gender Reassignment: We currently do not hold this information on our system.

Marriage and Civil Partnership: We currently do not hold this information on our system.

Pregnancy and maternity: We currently do not hold this information on our system.

Race:

Ethnicity	number of residents
Any other ethnic group	0
Black African	0
Black Caribbean	0
Indian	6
Not yet obtained	3
Pakistani	7
White British	7
White European	2

Religion and Belief:

Religion	Residents
Not disclosed	0
Christian	9
Church of England	0
Hindu	0
Methodist	0

Muslim	7
None	0
Protestant	0
Sikh	6

Sex:

Gender	Number of residents
F	17
M	8

Sexual orientation: We currently do not hold this information on our system.

Care Experienced: We currently do not hold this information on our system.

From the list above the residents who will benefit from this will be older residents who are Physically Frail. The new contract will decrease the waiting times and streamline the service.

We do not currently hold data on information and reason why residents were not successful or reason why the residents never went ahead with the application. The data we currently have is from the installation list and we are adapting to the system capture more information.

4. What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.

There will be no negative impact. The introduction of the new contract will reduce waiting times and the prices are fixed on the Framework which will reduce the cost of stairlift which means the resident who are accessed has fully chargeable will pay less. This will have a positive impact on older residents, as they are the main client group who request stairlifts and it will reduce waiting times.

5. What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?

There will be no negative impact. However, some residents do not go ahead with installing a stairlift due to they have to pay contributions towards the stairlift. Within the Housing assistance policy there is flexibility for Slough to pay the full costs of the stairlift if resident is deemed high risk.

6.	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>The data used is from the current installation list of stairlifts from April 2023 to end of August 2023 (6 months) This contract will address the faults and injustice in the Local Government and Social Care Ombudsman’s Investigation into a complaint about Slough Borough Council (Reference Number: 21 017 018) <i>Mrs X complained the Council had delayed in providing a disabled facilities grant (DFG) for a stairlift at her property. As a result Mrs X had been unable to access the first floor of her property independently for over a year.</i></p>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>This was included in the new policy and cabinet report engagement, part of the new policy was a sole stairlift provider.</p> <p>Engaged with teams who will be implementing the new way of working, Long Term OT team and ILT team, reported to the senior leadership team, Children’s First and councillors.</p> <p>The policy was reported to the Better Care Fund Group which includes Clinical Commissioning Group (CCG) and the Health and Social care partnership board.</p> <p>In October 2022 the policy will also be discussed at the Coproduction network, which is made up of residents, if any points are raised, we will take into consideration.</p> <p>The Independent Living Team will promote and advertise the benefits of the new policy to local residents and relevant agencies.</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>There will be no negative impact. The introduction of a Housing assistance policy does not alter existing processes and mandatory DFGs remain statutory. The new policy will improve services for the residents.</p>

	<p>Slough Borough Council has already changed the way the waiting list is recorded to urgent and non-urgent cases and removal of the current points system. This will ensure residents who are assessed as high risk will go onto urgent with high priority and everyone else will be added in chronological order.</p>
<p>9.</p>	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>We have already put changes in places which is changing how cases are on the waiting list to urgent and non-urgent.</p> <p>Using the Searchlight system, run by the department of working and pensions (DWP) to help cut down financial means testing assessment times by identifying people who are in receipt of benefits and are on passport benefits and will not be required to pay contributions. This will streamline the process and will reduce the waiting lists.</p> <p>Changing the way, we procure stairlifts this will also help reduce waiting times for installations.</p>
<p>10.</p>	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <p>We intend to carry out internal consultation with the teams and resident surveys upon completion of receiving the work. We are planning to start gathering more data on residents who are eligible, however opt out and the reasons for this, will also see how the new policy has impacted the waiting times and if other client groups have started to benefit from this.</p> <p>We will arrange a 1-year review of the policy and see the impact and take learning adapt the policy from this. (The new policy was introduced in November 2022) This review has not currently taken place.</p>

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	✓
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	✓
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

**Action
Plan and**

Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
Review new ways of working.	All vulnerable groups		To improve pathways of accessing the DFG schemes. Cut down waiting times from assessment to installation.	Surveys after each grant implementation KPIs		

Name: Ashfaq Hussain

Signed: (Person completing the EIA)

Name: Christine Ford.....

Signed:(Policy Lead if not same as above)

Date: 04th October 2023