

Communities, Equality and Local Government Committee

Meeting Venue:
Committee Room 2 – Senedd

Meeting date:
13 March 2013

Meeting time:
09:15

Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



For further information please contact:

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Agenda

Private Pre-meeting – 09.15 – 09.30

1. Introductions, apologies and substitutions (09.30)

2. Inquiry into Home Adaptations – Evidence session 8 (09.30 – 10.15) (Pages 1 – 6)

Community Housing Cymru
CELG(4)–09–13 – Paper 1

- Sioned Hughes, Community housing Cymru, Director of Policy and Regeneration
- Nikki Cole, Head of development, Wales & West Housing
- Shirley Davies, Homes and Neighbourhoods Director, RCT Homes

3. Inquiry into Home Adaptations – Evidence session 9 (10.15 – 11.00) (Pages 7 – 11)

Wales Audit Office
CELG(4)–09–13 – Paper 2

- Steve Barry, Performance Audit Manager – Local Government Region
- Nick Selwyn, Performance Audit Lead – Local Government

4. Inquiry into Home Adaptations – Evidence session 10 (11.00 – 11.45) (Pages 12 – 18)

Tai Pawb

CELG(4)–09–13 – Paper 3

- Emma Reeves–M^cAll, Equality and Diversity Officer

5. Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for the following business: (11.45)

Item 6

6. Committee Forward Work Programme (11.45 – 12.05) (Pages 19 – 23)

CELG(4)–09–13 – Private paper 4

CELG(4)–09–13 – Private paper 5



Inquiry into home adaptations

Community Housing Cymru response

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 136,000 homes and related housing services across Wales. In 2010/11, our members directly employed 6,500 people and spent over £800m in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and the Centre for Regeneration Excellence Wales (CREW) in order to jointly champion not-for-profit housing, care and regeneration.

Community Housing Cymru Group Members:
Aelodau Grŵp Cartrefi Cymunedol Cymru:



Community Housing Cymru response

Introduction

As the membership body for housing associations and community mutuals in Wales, we welcome the opportunity to respond to the National Assembly for Wales' Communities, Equality and Local Government Committee inquiry into home adaptations. We have discussed the terms of reference of the inquiry with our members and with partner organisations and feedback is included within this response.

CHC response

- **General comments**

As this committee will be aware, there is no single standard or process for adaptations within Wales and there are differences in the system, particularly in the different tenures such as Registered Social Landlord (RSLs) properties, accessing Physical Adaptations Grants (PAGS) and in private housing or privately rented properties where individuals have to apply for Disabled Facilities Grants (DFG's) for example. Over the years there has been a number of consultations on DFG's and the PAG's process in particular, but little action as a result of them so it would be useful for the committee to re-visit the recommendations from previous reviews that have been carried out.

Since the system of fast-track adaptations was introduced following the Welsh Government's Essex Review, our members have advised us that the current system for administering the PAG grants, especially those which fall under the fast track system, is a great system that is very responsive with the clients at the heart of the system. Members have stated that adaptations' times have shortened with the fast track system, with one member stating that it leads to works installed within 2 weeks. However, feedback from members has also stated that this 2 week figure does not recognise the lead in time to enable the implementation of the works which can be as long as three months or more in some areas. This is primarily a result of lack of resources within the OT sector and delays in receiving the reports to enable tenders or quotations for the works to be obtained. There are still layers of bureaucracy in the PAG system such as tendering process where frameworks are not in place which also impact on the end to end time of delivering the adaptation.

The fast track element of the PAG's system itself should be used as a programme of good practice and it is vital that any recommendations made don't impact negatively on the quality of services our members are able to deliver. However, we would hope that this review does look to resolve the unnecessary delays as eluded to above. It should also be noted that PAGs is not available to Large Scale Voluntary Transfer organisations, who are required to build their future adaptations demand and costs into their business plans when transferring. We will discuss this issue separately in the paper.

There is a need to be more creative about the use of resources to meet the increasing demand for adaptations and a need for health and social care to work together as housing affects health.

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Residents actually require work to be completed within a short space of time as their health can necessitate the work sooner rather than later and long waits for work to be completed also have an impact on the health sector through admissions and delayed discharge. The speed of the current system helps towards enabling disabled people to remain in their homes and cuts down on hospital admissions and aids hospital discharge and inevitably saves health money, as the adaptations are in place quickly. The grants also cut down on the costs to social services in terms of home care as the adaptations done quickly allow tenants to retain their independence in terms of personal care and meal preparation etc.

This form of funding is a good use of resources as the adaptations installed stay within the RSL stock and can be offered to another disabled person when the property is re-let. In addition, by looking and assessing in a holistic way, social landlords are able to consider a range of housing options for a disabled person, including a move to a more appropriate property as opposed to spending money on an adaption which may not produce a long term solution to the individual's need. We are seeing adapted homes registers developing in some areas across Wales or being integrated into Common housing registers. At a strategic level, there is some work being done by HA's to move towards common housing registers for adaptations. We appreciate that further work is required to ensure this is done across the board. However, the use of adapted homes registers and the link to common waiting lists is not working effectively which therefore results in many adaptations being removed from properties on relet. Furthermore consideration must now be given to impacts of welfare reform and the 'bedroom tax'. It will be important to capture how many residents who have previously received a PAG or who are living in purpose built properties will be affected by housing benefit changes and whether there a consistent approach to discretionary housing benefit in such situations.

- **What impact reduced resources for housing are likely to have on the provision of home adaptations**

Whilst the Physical Adaptations Grant has speeded up the process for some housing association tenants, there are particular issues facing older people living in properties that have been transferred from a local authority to a housing association. In these cases tenants of large scale voluntary transfer (LSVT) organisations are not eligible for the Physical Adaptations Grant and they cannot access DFG either. The amount of funding that an LSVT will use to fund its own DFG's will depend on what was factored into their business plan prior to transfer, with figures ranging from around £430k per annum to £1m per annum. Whilst certain LSVT's are working very closely with their local authority, due to financial pressures on the council, they have had to increase the time it takes to carry out adaptations for tenants. Certain LSVTs in Wales do not have funding built into their business plans and therefore the financial burden falls on the local authority which may not be the best option.

As well as the total funding for works, LSVT'S may well employ a full time surveyor to facilitate the works of adaption. This equates roughly to a further £50k of funding including on costs. Reduced resources mean that LSVT's will have less funding all round and services will be reduced or slimmed down. Whilst LSVT's may opt to continue to invest in aids and adaptations they may well reduce other service provisions. The LSVT is responsible for ensuring funding is available for adaptations,

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and there is a need for strategic, long term planning for funding of adaptations when business plans for stock transfers are drawn up.

Since 2005, demand on PAG's has increased. For example, in 2007/08 PAG spend figures amounted to £4.8m and for 2011/12, the top sliced amount for PAG's from SHG funding amounted to £8.5m. The levels of spend on PAG's in recent years needs to be translated into the number of PAGs actually provided and the type, e.g. fast track, large extensions etc. An understanding of the number of individual households benefiting from the system will provide a more robust value for money view point to the inquiry.

We are seeing significant reductions in social housing grant budgets for future years. We need to see a combination of actions including the need for a better use of resources and the need to make the clear link between health, housing and social care and look at the integration, for example, of health and social care re adaptations budgets and oversee this. The key aim must be sustaining adequate resources in the light of increased demand. Organising adaptations needs to be based on whole systems thinking (e.g. including social care, health, housing) and policy integration rather than being based in individual settings and we need better general links between housing services and re-ablement services.

- **Is the Welsh Government effectively monitoring the provision of adaptation services**

Any improvements to speed up the system, especially for young people and older persons, would be welcomed: there should be recognition that the PAGs 'fast track' system has been a success, and this has been partly due to a recognition that professionals need to have confidence in the competency of other professionals, albeit in a different discipline. CHC realises that there is still a need to gather evidence from our members in Wales regarding the average waiting times for the installation of an adaptation. CHC will be able to get a snapshot of this type of data by the time we give oral evidence to the committee on the 13th of March to underline what we have stated above, although we recognise that in the long term it is vital that RSL's work with Welsh government and local authorities, amongst others, to properly monitor and map out average waiting times for an installation as well as measuring demand and how much of our own members resources are spent on small adaptations.

- **Why are there still significant variations in the time it takes to deliver aids and adaptations funded by disabled facilities grants across Wales?**

This point in the terms of reference has been commented on above. Our members have not accessed DFG's at any sort of scale even though it is legally open to all tenures. Feedback and statistics from the "Homes for Wales: Transforming Housing Adaptations" event in Cardiff in July, demonstrated that council tenants and owner occupiers may face unacceptable waiting times for sometimes very basic adaptations and significant variations may exist because of the different ways that different LAs in Wales deliver their DFG and adaptation services.

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Occupational therapists

In identifying barriers to streamlining services, OT's resources are an issue that needs to be looked at in terms of pooling resources. Feedback from the event in July suggested inconsistencies in O.T. assessment times relating to insufficient resources amongst other reasons. There is a need to ensure the use of OT resources is effective. Where it works well, it is not necessarily replicated across all locations (e.g. trusted assessors for smaller adaptations, ensuring OT use for complex care cases etc). There is a need to clarify the OT staff role in respect of minor adaptations. The issue of training for RSLs and OTs is paramount in as much as referrals to OTs do not always make the best use of their time. Members have stated that OTs may sometimes build up expectations to the point that an RSL feels bound to at least review individual referrals for works which may be in excess of the value of the property or inappropriate to carry out. Local working arrangements are key so resources and homes are used most effectively and efficiently.

Means testing

Means testing is a contentious issue. In principle the need for adaptations shouldn't be means tested. Whether means testing was to be simplified or abolished for example, in terms of its use-fairness, bureaucracy and delays need to be looked at. Means testing can be complex and time consuming and potentially inequitable.

Working with Care & Repair

Our members support the services available through Care & Repair being made available to social housing tenants and a significant amount of CHC members utilise the services of Care & Repair agencies. LA's and RSL's have the opportunity to look at the services provided by the Care & Repair agency operating in their area to assess the potential for a better service.

Feedback from the sector has stated that there has been positive experience of administering the Independent Living Grant and that the scheme has delivered an improved adaptation service, demonstrated value for money, was efficient and timely, certainly warrants additional investment and the programme has made a significant difference to people who had been on waiting lists for a considerable time. CHC welcomes the recent additional funding of approximately £1m for the ILG for 21012/13.

Furthermore, CHC believes that the value which is achieved through RRAP programmes is well documented and any extension can only be beneficial, not only for individuals but for other service providers in the public sector (e.g. health and social care budgets). We were very pleased given the current economic climate that the Rapid Response Adaptations Programme (RRAP), grant funding for 2012/2013 was maintained at the same level as 2011/2012. Care & repair Cymru have estimated from information gathered over the last 10 years that each pound spent on Rapid Response Adaptations saves Health/Social Services around £7.50. The programme is acknowledged by all partners to be efficient and effective, yet demand exceeds funding and the programme has to be

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rationed. The value and input of the programme cannot be underestimated, work is carried out speedily, the service is cost effective and professionally undertaken. This could certainly be expanded to older people living in social housing.

More work needs to be done jointly with health on early release temporary accommodation and provision of respite services as well as best use of resources for patients who have an ongoing condition and low level interventions such as accident prevention of slips, trips and falls e.g. slipper exchange. Facilitating the emergency evacuation of tenants may involve major structural work to homes as well as the resources of the emergency services including the fire service. When adapting homes, it is also important to recognise what it means for the tenant. So often, a tenant may not understand a set of plans or how their home will change if e.g. a through floor lift is installed. This often causes unnecessary anxiety and distress and has resulted in tenants terminating their tenancy.

**Community Housing Cymru
February 2013**

**Community Housing Cymru Group Members:
Aelodau Grŵp Cartrefi Cymunedol Cymru:**

**WALES AUDIT OFFICE****SWYDDFA ARCHWILIO CYMRU****Wales Audit Office / Swyddfa Archwilio Cymru**

Date: 1 February 2013
Our ref: HVT/1807/hcj
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Mr Marc Wyn Jones
Clerk
Communities, Equality
and Local Government Committee
National Assembly for Wales
Cardiff Bay
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Dear Mr Wyn Jones

INQUIRY INTO HOME ADAPTATIONS

I received recently the Committee's consultation letter for its inquiry into *Home Adaptations*. Drawing on evidence from some of our recent audit work across local government, I have appended to this letter a brief response to the consultation.

I hope that this is helpful to the Committee. Wales Audit Office staff would be happy to discuss our audit evidence about the delivery of home adaptations in Wales with you in more detail if that would be helpful.

Yours sincerely

HUW VAUGHAN THOMAS
AUDITOR GENERAL FOR WALES

Annex: Wales Audit Office response to the Communities, Equality and Local Government Committee consultation on *Home Adaptations*

1. Home adaptation services are an important part of a wider system that seeks to support independent living for people with disabilities. Other elements of that wider system include the supporting people funding regime and reablement services.
2. While the Committee's terms of reference refer specifically to Disabled Facilities Grants (DFGs), these are, as the 2009 report by the Equality of Opportunity Committee recognised, just one of a number of ways in which home adaptations can be funded. Alternative sources of funding include care and repair works, adaptations to local authority owned properties that are funded through the housing revenue account, and Physical Adaptation Grants for tenants in housing association owned homes.
3. Our recent performance audit work across local government has included analysis of some councils' performance in the delivery of DFGs. Performance audit staff have also been giving specific attention recently to the overall adequacy of the 'National Strategic Indicator' that is used to measure the delivery of DFGs by local councils across Wales. This work has not yet been finalised or reported.
4. In interpreting the available data on the timescales for delivery of DFGs, it is important to recognise that these are often provided to very vulnerable and disabled people whose needs and requirements can change over the lifetime of a DFG application. Their decision to ultimately pursue an adaptation can be quite difficult and may take time which can add to the length of time taken to deliver the works. In our experience, there are examples where councils will close cases while they wait for an applicant to agree to progress with the adaptation work, only to then start the whole process again when they decide to proceed.
5. Moreover, complex adaptations work can inevitably take longer. There is the risk that if too much emphasis is placed on chasing improved performance against the national performance indicator, this could provide a perverse incentive for councils to prioritise resources towards less complex work to the detriment of those in most need. However, the reported performance data also excludes DFG work valued at under £5,000. For some councils, such work can represent a significant proportion of total DFG related expenditure and the adaptations provided can still have a significant impact in maintaining recipients' independence.
6. The Committee may wish to explore in more detail the scope for further refinements in the performance management framework to differentiate between different categories of DFG works (for example by type or value). The Committee could also explore opportunities to better evaluate the overall value for money of councils' investment in DFGs by considering other measures that consider the impact on those benefiting from the work and the overall quality and cost of the work. As things stand, while the performance management framework does now distinguish between DFGs delivered for young people and adults, the Equality of Opportunity Committee's suggested refinements to the performance indicator arrangements do not appear to have been enacted in full.

7. Measuring DFG performance as a National Strategic Indicator has been important in helping to raise the profile of DFG works and their contribution in support of independent living. However, it remains the case that this measure focuses on DFGs delivered to owner-occupiers and tenants of private sector landlords. It does not capture councils' performance in delivering adaptation work across their own housing stock, where councils still retain stock. Similarly, it excludes Physical Adaptation Grant work carried out on housing association owned homes which, due in part to local authority stock transfer, has been increasing in value. While housing associations provide information to the Welsh Government setting out the overall volume of adaptation grant work undertaken, we are not aware of there being any system in place to more formally evaluate housing associations' performance in delivering this work and, unlike councils, housing associations are not required to report publicly on their performance. Similarly, we are not aware of the Welsh Government having any arrangements in place to formally monitor the level or performance of Care and Repair related activity.
8. More generally, the significant variations that we are still seeing in the time it takes to deliver aids and adaptations funded by DFGs across Wales can reflect, at least in part, the adequacy of councils' underpinning management arrangements. For example, we would observe that:
 - a. There is an ongoing tendency for some councils to adopt traditional approaches to procurement through single tender contracts rather than using more modern methods such as partnering/framework agreements and/or batch contracting.
 - b. Formal accreditation systems for the contracting of DFG works are often lacking in terms of their focus on:
 - i. Standards of customer care, such as keeping appointments, keeping the site tidy and controlling noise.
 - ii. Vetting of financial standing, tax and VAT status, and insurance arrangements.
 - iii. The promotion of good health and safety practices.
 - iv. The use of warranty schemes.
 - v. Requiring references.
 - c. The extent and effectiveness of integrated approaches to assessing and delivering works (between occupational therapy and grants staff) remains variable. In our experience, few councils have an end to end system that brings all key stakeholders together to deliver DFGs effectively. There is a tendency still for the individual elements of the DFG process to follow one after another in a linear fashion, rather than councils looking to opportunities to streamline, for example by operating different parts of the process in parallel.

- d. Because DFGs are means tested¹, the application and approval process can often be complicated and long. That said, it is clearly important that local authorities maintain appropriate controls to protect against fraud. Opportunities for councils to speed up the process can include: the use of HM Land Registry to ascertain property information and title; the use of online credit agencies to check financial data on clients; effective filtering and fast tracking of DFGs at first contact; and undertaking the applicant financial assessment at the point the DFG assessment is completed.
- e. The referral process, to enable clients to be assessed promptly and quickly, is supported by poor information management systems which do not operate to right first-time principles. As a consequence, all the information required to assess a client is not necessarily captured at the first point of contact. This can result in substantial delays as councils tend to put the onus on the client to resolve the information gap rather than seeking to manage the burden of evidence themselves.
- 9. We have seen evidence of some councils sustaining their budgeted expenditure on DFGs in recent years despite wider financial constraints. However, current investment is not always sufficient to deliver all the mandatory DFGs required and applicants often have to wait considerable time to secure a grant. Should the Committee be requesting any updated information on councils' budgets/expenditure on DFGs, it is worth being aware that there are differences in how these services are paid for locally. In our experience, some councils seek to secure a fee income from the DFG under an agency arrangement while others are core revenue funded and spend 100 per cent of the DFG budget on adaptation work. The Committee may also wish to consider whether councils and housing associations are making best use of existing adapted housing to avoid spending money unnecessarily on adaptations to their own housing stock.
- 10. Finally, the Committee may be interested to note the findings from a piece of work that the Wales Audit Office commissioned from Cardiff University's 'Lean Enterprise Research Centre' in 2009-10. That report considered the application of lean and systems thinking across the public sector in Wales and included a case study about a systems thinking review of Neath Port Talbot County Borough Council's DFG service². In our 2012 Annual Improvement Report, we noted that DFGs were one of a number of areas where the Council could demonstrate improved service delivery times and improved service quality. That was despite the Council performing poorly in comparison to other councils against the national strategic indicator for the time taken to deliver DFGs. The Council has developed other performance measures, separate to the delivery time, to help monitor service performance.

¹ For young people (under 19s) there is no means testing. However, in our experience this does not necessarily result in noticeable differences in the average delivery time for DFGs.

² Lean Enterprise Research Centre, Lean and Systems Thinking in the Public Sector in Wales, January 2010, http://www.wao.gov.uk/assets/englishdocuments/Systems_Thinking_Report_eng.pdf

Paper 3

Communities, Equality and Local Government Committee

Inquiry into Home Adaptations

Response from : Tai Pawb



8 January 2013

For further information about this paper please contact:

Emma Reeves-McAll

Equality and Diversity Officer

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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's mission is, "To promote equality and social justice in housing in Wales". It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Assembly Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services.

Tai Pawb's vision is to be:

The primary driver in the promotion of equality and diversity in housing, leading to the reduction of prejudice and disadvantage, as well as changing lives for the better.

A valued partner who supports housing providers and services to recognise, respect and respond appropriately to the diversity of housing needs and characteristics of people living in Wales, including those who are vulnerable and marginalised.

For further information visit: www.taipawb.org

Charity registration no. 1110078
Company No. 5282554

Introduction

As a membership body for social housing providers across Wales we welcome the opportunity to respond to the National Assembly for Wales' Communities, Equality and Local Government Committee inquiry into housing adaptations. We further welcome the opportunity to submit oral evidence to the inquiry in March 2013, during our oral evidence we will provide further detailed feedback from our membership once it has been forwarded to us.

General Comments.

1. There are currently several routes for an individual to access funding to help with the cost of adapting their home to enable a greater independence in their daily lives. The route into funding is both complex for the individual and creates inequalities dependent on:

- tenure type
- age
- income / means tested approach

2. Additionally there is concerning anecdotal evidence that refusal of adaptations is being used as a housing management tool to tackle some of the perceived problems associated with under occupancy. It is unclear if all tenants who request adaptations for their property and who are under occupying are refused on the grounds of occupation level or if only those who are receipt of housing benefit are being denied access to these services. It is further unclear what knowledge there is of suitable accessible or adaptable housing being available for these individuals or what consideration, if any, is being given to the impact this has on community cohesion and individual support networks. This is an area which Tai Pawb is seeking more information on and hopes to be able to present this to the inquiry during their oral evidence in March 2013.

Why there are still significant variations in the time it takes to deliver aids and adaptations funded by Disabled Facilities Grants across Wales

3. Some variation is to be expected in the delivery time for Disabled Facilities Grants on a regional basis across Wales. These will be associated with local capacity difficulties and challenges, population demographics and, the housing stock itself and also the typography of the area. Furthermore local variances in the administration processes of the Disabled Facilities Grant may also account for some of the disparities between Local Authority areas and the completion of work through a disabled Facilities Grant. This is somewhat inevitable in a complex system where there can be a large disparity between the types of adaptations requested in one local authority area in comparison with another. As a DFG is a means tested grant there may be significant delays associated with some disabled people having to secure finances to cover their contribution towards the cost of the grant also.

4. Currently the DFG is the only adaptation process which has a Performance Indicator associated with it, but this PI does not distinguish between the *type* and *complexities* of the adaptation being provided and simply considers the waiting time. However the separation of PIs for adaptations which were provided for children and adults does allow for a low level comparator to exist between adaptation types. Whilst it may be possible to consider comparator waiting times for DFGs across local authority areas, there are significant data challenges which need to be addressed to ensure there is an accurate like for like comparison being made. Additionally it is not possible to compare variances between DFG processes and other funding routes such as PAG, RRAP and Independent Living Grants as there are not PI associated with these forms of funding.

5. Additionally the PIs which is used for DFGs does not take into consideration that the process has distinct processes within the grant which need to be completed in a particular order. The PI does not allow for accurate recording at what stage during the grant process a wait is generated. Thus it is difficult to use the PI to improve service delivery or to enable accurate like for like comparisons either within a local authority area or across boundaries. For example a delay may occur due to waiting for access to an Occupational Therapist Assessment as the service user has been assessed as a low priority using Fair Access to Care Services (FACS) criteria this is included in the PI for the DFG as it is part of the time taken to get a solution to the problems being faced by the service user. However the wait occurred outside of the DFG process as it is only after the assessment has been completed and a DFG has been identified as a solution that any progress can be made on the applications. Some local authorities will fast track DFG referrals but it is not always clear on the application if this is the basis for the application for assessment; the concern with prioritising on these grounds rather than need is that those who are in significant need may face unacceptable delays in service provision as capacity is being used by DFG applications.

Whether sufficient progress has been made on the implementation recommendations from the Equality of Opportunity Committee's 2009 report on home adaptations

6. According to the response from the College of Occupational Therapists to our inquiry there have been significant improvements in service design and delivery in light of the 2009 report by the Equality of Opportunity Committee

7. Recommendation 9– the Older Persons Commissioner, Age Cymru, Care and Repair and the College of Occupational Therapists work together to produce a information leaflet to help older people better understand the options available to them when considering the need to adapt their home.

8. Tai Pawb would like to see this approach extended to all people across Wales and an accessible information leaflet to be produced to help disabled people and their

families and carers to understand the complexities of the housing adaptation system. In the light of the increased reliance on the private rented sector within Wales and the proposed tenancy reform this is a minimum step which should be considered by Welsh Government.

9. Recommendation 10 Whilst there has been some work undertaken by the college of occupational therapists, some work with housing organisations and continuing care providers in Wales and Tai Pawb has a voice on the All Wales Posture and Mobility Board there is more work to be done in this area. There are significant improvements which could be made by closer working between health and housing in Wales; this includes better and more robust links with discharge nurses in rehabilitation units as a minimum. A recent (English) report highlighted the unacceptable levels of young people with an acquired spinal injury who were placed into older persons (non specialist) care homes as they were unable to return to their home to do accessibility difficulties (Aspire Report <http://www.aspire.org.uk/Data/Sites/1/media/what-we-do/carehomeresearch/carehomeresearchreport.pdf>)

What impact reduced resources for housing are likely to have on the provision of home adaptations.

10. There are significant challenges currently facing the social housing sector in Wales, in part as unprecedented changes in welfare provision take hold. Welsh Government continues to support the use and establishment of Accessible Housing Services in Wales (Framework for Action on Independent Living) however the unintended consequence of housing benefit reform and under occupation changes make mean that the efficiency of such services is called into question. Previously Accessible Housing Services have operated on a best match or best fit approach which could result in under occupancy. In effect the primary driver had been to provide the disabled person with a property which best match their access needs in terms of adaptations. This approach ensured that the disabled person was housed in a property which matched their needs whilst ensuring that adaptations did not go to waste or where not being removed at additional cost to the tax payer. Whilst housing management would also be to try to avoid under occupancy; where this was not possible it was thought to be more efficient to allow under occupation and reuse of adaptation rather than removal of adaptations possible new grant funded adaptations being utilised in a smaller property where under occupation did not exist. This not allow ensured efficiency within the housing and grants system were maintained but for the service user it facilitated moving to suitable properties in a more timely manner. With the introduction of under occupation charges it is unclear how the system will continue to work. There is a real danger that adaptation will begin once again to be removed from properties where appropriate sized disabled households cannot be found allowing old inefficiencies to creep back into the system.

11. Tai Pawb has further concerns related to permissible services charges. Previously some housing providers in Wales had accounted for maintenance contracts and general up keep of adaptations within a housing benefit claim. This, under the new rules, is no longer allowed. There is concern that people in need of adaptation will not apply to have these completed as they are fearful of the additional costs they will incur due to annual maintenance charges associated with the adaptations. This is also a concern highlighted by our members.

Is the Welsh Government effectively monitoring the provision of adaptation services?

12. As indicated in our response to previous questions there is much more scope for appropriate and accurate monitoring and PIs across all grant schemes in Wales. There is no systematic equality monitoring data which is collected using a standard format used by all grant administering bodies / agencies. This means that there is no systematic way of ensuring equity of access to grant funding streams in Wales for any of the protected characteristics. Therefore satisfaction in service delivery cannot be assessed either on a regional basis or used for whole service comparators in relation to any of the protected characteristics.

What needs to be done to improve home adaptations services in Wales

13. There are several key areas for consideration to improve home adaptation services in Wales these are briefly listed below and we welcome the opportunity to expand on these during our oral evidence in March 2013:

- Clear and careful consideration to reduce the complexities within the funding routes for housing adaptations
- Consideration of a tenure 'blind' approach to housing adaptation grant funding in Wales
- Appropriate mitigating actions to be considered and implemented to help ensure that resources are not wasted as a direct result of under occupancy rules for housing benefit claimants.
- Consideration of the appropriateness and disparities which are created by the DFG process being means tested and the PAG and Independent Living Grant being non- means tested.
- If means testing is to remain a propitiate approach to means testing is utilised, that additional options are made available for all people in Wales such as a low cost loan.
- No disabled person in Wales should be forced to live in a non-adapted home due to the inability to afford a contribution towards a means tested grant.
- Consideration should be given to the wider impact of enabling a disabled person to remain in either a privately rented home or a home they own, in terms that the alternative for them is to try to access social housing through a housing association where any adaptation needs would not be means tested. In a system where there currently is a lack of accessible housing the abolition

of a means tested DFG should be considered in the light of the alternative which could be this person trying to be rehomed the oversubscribed social housing sector.

- Help to mitigate the disproportionately negative impact associated with DFG means testing and younger people.
- If one grant administering body is to be used in Wales Welsh Government needs to ensure that this body is properly funded and adequately resourced. Furthermore Welsh Government will need to ensure that any such body has the expertise to work with people who may identify themselves as possessing any of the protected characteristics listed in the Equality Act 2010, and to ensure that all aspects of service delivery and design are monitored in relation to this.
- Better use of Occupational Therapist resources including the possibility of OTs dedicated to housing as shared resources jointly funded by LAs, Housing Associations and LSVTs.

By virtue of paragraph(s) ix of Standing Order 17.42

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