Welsh Government
Consultation – Summary of Responses

Housing Adaptations Service Standards

April 2019
1. Introduction

Welsh Government currently provide funding to Local Authorities, Housing Associations and Care and Repair Cymru and agencies to support disabled and older people in Wales to live independently. Services can include the installation of equipment into homes to help an individual remain as independent as possible and reduce the risk of hospital admissions due to trips and falls, and to facilitate a faster hospital discharge.

Service delivery varies significantly across Wales, as a result, the system is overly complex and difficult to navigate for people using services and organisations providing support.

In 2018 the Wales Audit Office (WAO), Equality and Human Rights Commission (EHRC) and Welsh Assembly Public Account Committee (PAC) reviewed the Adaptations system. Each organisation made recommendations to improve delivery of adaptations. Welsh Government, with the help of expert stakeholders has developed a set of service standards and this report summarises the results of a consultation exercise which took place between September and December 2018.

2. Proposal

The standards document outlines a set of seven service standards which focuses on the following areas:

Standard 1 – Purpose
Standard 2 – Equality and Diversity
Standard 3 – Communication
Standard 4 – Quality of Service
Standard 5 – Quality of Equipment
Standard 6 – Delivery timeframes
Standard 7 – Eligibility Checks

Standard 6 and 7 are broken down further into classifying adaptations into ‘small, medium and large’ and setting levels of service that can be expected for each classification. The definitions of those classifications are also included in the consultation to ensure they are as appropriate and understandable as possible across Wales.

3. Consultation Engagement

Five questions were set out in the consultation document:
1. Will the proposed service standards improve the way housing adaptations are delivered in Wales? If not, are there further service standards which should be included?

2. Are the proposed service standards on the ‘Expected Timeframe (Service Standard 6) challenging enough?

3. Are the definitions for a small, medium and/or large adaptation sufficiently clear? If not, how could they be clarified?

4. Are there any issues relating to impact on the Welsh language, equalities or children’s rights in relation to this draft guidance that you wish to highlight?

5. Do you have any further comments to add?

We received 53 written responses to the consultation from organisations and individuals, some of which wished to remain anonymous. A list of those responses who gave permission to be published can be found in Appendix 1.

Welsh Government held a consultation workshop in Llandrindod Wells on 5 December 2018. Forty three people attended including; Occupational Therapists, Local Authority staff, Care and Repair and Housing Association staff. TPAS Cymru engaged with their disabled tenant’s network within housing associations and posed the five consultation questions to them.

4. Responses to Consultation - Overview

The written consultation received 53 written responses, with the largest number being from local authorities, as well as representation from housing associations, individuals and third sector delivery organisations demonstrating a wide reach between organisations, local authorities and individuals as detailed in table 1.

Table 1

<table>
<thead>
<tr>
<th>Respondent type</th>
<th>Number</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual</td>
<td>7</td>
<td>13%</td>
</tr>
<tr>
<td>Local Authority</td>
<td>19</td>
<td>36%</td>
</tr>
<tr>
<td>Private sector organisations</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Housing Association</td>
<td>9</td>
<td>17%</td>
</tr>
<tr>
<td>Care and Repair Cymru / Agencies</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Health Specialists</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Community / Advisory Groups</td>
<td>3</td>
<td>6%</td>
</tr>
<tr>
<td>Charities / Third Sector</td>
<td>4</td>
<td>8%</td>
</tr>
<tr>
<td>Expert / Advisory organisation</td>
<td>2</td>
<td>4%</td>
</tr>
</tbody>
</table>
Summary of responses overview
Overall, the responses showed positivity in the development and proposed implementation of Housing Adaptations Service Standards. In general, the following main points were raised:

- The proposed housing adaptations service standards document has scope to improve access to services and give an understanding of what level of service users can expect.

- The standards are a good starting point to support the long term aim to improve how housing adaptations are delivered across Wales and are seen to continue to improve with better data monitoring.

- On the whole it was largely agreed the service standards are relevant and achievable. Key concerns were raised relating to the time frames for delivering small adaptations with 2 weeks being identified as too challenging.

- The majority of comments related to providing greater clarity on the proposed standards to give insight into the expectations of Welsh Government. Respondents also wanted to see stronger links to the wider policy agenda such as the Social Services and Wellbeing Act, Equalities Act 2010, and the UN Principles for Older Persons.

- Broader points were raised which highlighted areas Welsh Government would need to address for the standards to be effective and for the delivery housing adaptations to be a success:
  - The way in which adaptations are funded need to be simplified due to the disparity between different funds which is contributing to an inconsistent and inequitable system.
  - Housing adaptations should be seen as one of a number of options that can help disabled and older people to live independently, where other options highlighted included the role of re-ablement activity and where appropriate, re-housing may be a more effective solution.
  - There is a need for greater guidance and clarity for private sector landlords, so they are aware of their responsibilities.
  - Although the standards will increase levels of consistency in the delivery of housing adaptations they also raise the level of expectations amongst users which will be difficult to manage with restricted budgets and resources.

5. Summary of responses to specific questions

5.1 Question 1: Will the proposed service standards improve the way housing adaptations are delivered in Wales? If not, are there further service standards which should be included?

Summary of responses
There was a large proportion of positive responses that felt the standards will help improve the way housing adaptations services are delivered, with 79% of responses welcoming the implementation of service standards. The majority of comments
received focused on clarifying and expanding the standards in the consultation, with no new additional standards proposed.

It was noted that the complexity and inequitable funding options need to be addressed in order to help the service standards be successful. For example, DFG for owner / occupiers is subject to means testing and capped, whereas housing association tenants may receive large adaptations without query. If these are addressed alongside the service standards it will help minimise inconsistencies.

There was a strong sentiment that the implementation of the service standards for all types of housing adaptations will provide a threshold which service delivery can be measured and ensures the timeframes and experiences of individuals are aligned, regardless of their tenure or funding options available to them.

From these responses, alongside the recommendations within the WAO, EHRC and PAC reports, Welsh Government are engaging with the sector to make further changes to the system. The standards provide a platform to deliver change within the sector and will provide a planning tool for service providers to deliver housing adaptations in a more consistent manner.

Given the positive reception, changes made focus largely on clarity and detail to aid greater understanding of the standards.

5.2 **Question 2:** Are the proposed service standards on the ‘Expected Timeframe’ (Service Standard 6) challenging enough?

**Summary of responses**

Over half of the responses received, 68%, felt the expected timeframes were challenging enough, especially for medium and large adaptations.

The majority of comments received related to the proposed timeframes of 2 weeks to deliver a small adaptation, where many providers highlighted this would be difficult to achieve for the majority of cases. Comments also highlighted that to help prioritise delivery of small adaptations, they could be split between urgent and non-urgent, with non-urgent small adaptations having a longer time period to install.

Other comments received highlighted the need to clarify the 'starting point' for a housing adaptation, so it’s clear what the expected timeframes will cover and when the standard is measured from. Clarity on this point is reflected in the final guidance, but the Welsh Government does recognise that there will be cases where the timeframes will not be appropriate for a number of reasons, where other support measures may be explored before a housing adaptation is confirmed as necessary.

It was urged in some responses to take into consideration the impact small housing adaptations can have on a person’s well-being and their ability to live independently in their own home. As a result, value for money impact of a speedy adaptation should be considered more when thinking of small adaptation installations.
The introduction of a 10 working day limit to small housing adaptations was raised as a concern amongst a number of service providers. As a result, the Welsh Government have amended the timeframe for small adaptations to be delivered within 15-20 working days, which will be dependent on the urgency of the situation, from the date of referral. The standards clarify the starting point that will apply for the different timeframes.

5.3 Question 3: Are the definitions for a small, medium and/or large adaptation sufficiently clear? If not, how could they be clarified?

Summary of responses
64% of responses believed the definitions for small, medium and large adaptations are clear to understand. Some comments received highlighted that detailed lists of types of work should be provided for each of the different categories to allow for greater understanding.

Some responses suggested the definitions should not be definitive or an exhaustive list, as some cases vary in complexity, even with small adaptations. This reflects our aim of giving the service standards some flexibility to help service providers determine how best to use their resources against pressures and the needs of the individual. Having a prescriptive list would be too unmanageable and would not provide flexibility for service providers to use their professional judgement on how best to classify the adaptations. The Welsh Government will keep this area under review and will update and revise the service standards if it becomes clear that further detail is required.

5.4 Question 4: Are there any issues relating to impact on the Welsh language, equalities or children’s rights in relation to this draft guidance that you wish to highlight?

Summary of responses
68% of responses were positive about the way in which the service standards are taking into account the Welsh language, equality and children’s rights needs of the service users.

Based on comments received the standards have been further updated to place greater emphasis and linkages to the Social Services and Wellbeing (Wales) Act 2014, UN Principles for Older Persons and the Equalities Act 2010.

5.5 Question 5: Do you have any further comments to add?

Summary of responses
There were many useful ideas given for question 5, which Welsh Government have reviewed and taken on board.

It was highlighted that service standards aren’t able to be successful as a standalone tool to improve the way in which housing adaptations are delivered across Wales. There are many elements that need to come together to make the service standards
effective and meaningful, including how they are monitored and evaluated. This is reflected in the final Service Standards.

Thought should also be given to how the service standards align with other areas of housing adaptations, such as the ‘Adaptations Without Delay’ review being carried out by Royal College of Occupational Therapists.

Creating a Wales wide first point of contact was suggested as way to simplify how an individual engages with the service and simplifies the process of how and where a referral is made to the relevant delivery partners, reducing waiting times and providing a more consistent approach to housing adaptations delivery.

5.6 Feedback from consultation workshop and partner network

As part of the consultation process, Welsh Government officials held a consultation workshop with 43 attendees consisting of local authorities, housing associations and third sector service delivery organisations. Facilitated conversations on the day were largely positive, with the introduction of service standards being welcomed. Some overall comments have been included below:

5.7 Feedback from partner network workshops

As well as the above event, our tenant participation partner (TPAS Cymru) posed the five consultation questions to their disability network, held in both North and South Wales. A total of 28 delegates were present at both network meetings, with a diverse group of social housing staff and tenants from across Wales with a wide range of ages, disabilities (e.g. sight loss, hearing loss, wheel-chair users), and back-grounds. Some overall comments have been included below:

Given the similarities in opinions and suggestions from both service users and providers (5.5 and 5.6), all comments have been considered and will be explored as a way to improve the way in which services will be delivered across Wales as a whole.

6. Conclusion

Overall, the consultation responses demonstrated positive support for the proposed Housing Adaptations Service Standards with around 65% of answers being favourable of the service standards being proposed.

Whilst care has been taken to acknowledge all of the suggestions in the responses given, the aim of the housing adaptations service standards is to not be too prescriptive; giving flexibility which compensates for local variances and pressures.

Changes have been made within the service standards addressing the suggestions made in the responses, e.g. the language used in the document and the timeframes set for small adaptations. Going forward, Welsh Government will continue to engage with the sector to make further improvements to the system as a whole for the benefit of the public across Wales regardless of their tenure or geographical location.
7. Next Steps

Welsh Government have reflected on the responses gained and considered what changes should be made to the housing adaptations service standards.

It is the intention to publish the Housing Adaptations Service Standards ahead of the next financial year (April 2019) ready for it to be implemented across all adaptations service delivery organisations.

Welsh Government understands the need to remain flexible in its current approach to housing adaptations, and further work is being carried out to deliver continuing improvements to the delivery of these services. As such, the housing adaptations service standards will be reviewed annually to ensure they remain relevant, useful and continue to provide the basis for good practices across all Wales and organisations delivering adaptations.
Appendix 1

**Responding organisations / individuals**

Action 50+ Monmouth  
ADSS  
Alzheimers Society Cymru  
Arfon Access group  
Caerphilly County Borough Council  
Canllaw  
Cardiff County Council  
Care and Repair Cymru  
Carmarthenshire County Council  
Cartrefi Cymunedol Gwynedd  
Community Housing Cymru  
Conwy County Borough Council  
COS and CCG  
Cymorth Cymru  
David Williams  
Disability Wales  
EHRC  
Flintshire County Council  
G. Williams  
H. Jones  
Isle of Anglesey County Council (Ynysmon)  
Michael Cleminson  
Modular Adaptation Pods Ltd  
Monmouthshire Council / integrated services  
Monmouthshire Housing Association  
Neath Port-Talbot County Borough Council  
Newport County Council (community OTs)  
Newport County Council (Housing services)  
North Wales Housing  
Older Peoples Commissioner for Wales  
Pembrokeshire County Council  
Pennaf Housing group  
Private Sector Housing Expert Panel  
Richard W Ebley  
Royal College of Nursing  
Royal College of Occupational Therapists  
Swansea Council  
Tai Ceredigion Monitoring Group  
Tai Pawb  
Tai Tarian  
Torfaen County Borough Council  
TPAS Cymru - Disability network events  
United Welsh Housing Association Ltd  
Vale of Glamorgan Council - Vale homes adaptations team  
Wales & West Housing  
Welsh Therapies Advisory Committee  
Wrexham Council

A total of 9 anonymous responses were also given