



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

REVIEW OF HOUSING ADAPTATIONS INCLUDING DISABLED FACILITIES GRANTS – WALES

***A Report by Chris Jones
For the Housing Directorate, Welsh Assembly
Government
March 2005***

Acknowledgements

I would like to thank the following people from the Private Sector Housing branch of the Welsh Assembly Government's Housing Directorate for their support and assistance during the undertaking of the DFG review in Wales:

Brendon Hilbourne
Jeff Childs
Huw McLean
Anne- Marie Petterson
Linda Jones
Gerry O'Brien

I would also like to thank everyone else from the Assembly's Housing Directorate who provided me with information to help undertake the review and compile the report.

Thank you also to officers from local authorities, housing associations, voluntary sector organisations, and individuals across every part of Wales for taking the time to complete questionnaires, and participate in long meetings to help build an accurate picture of DFG and housing adaptations service provision and potential improvements.

Chris Jones
City & County of Swansea
On secondment to the Welsh Assembly Government

DFG AND ADAPTATIONS REVIEW- WALES

Executive Summary

Section 1 Introduction

Section 2 Background And History Of The Legislation And System

Section 3 Literature Review

Section 4 Review Findings, Conclusions And Recommendations

Part A	Legislation
Part B	Funding
Part C	Waiting Times and Delays
Part D	Dependent children DFGs
Part E	Council Tenant DFG/Adaptations, and stock transfer implications.
Part F	Adaptations for Housing Association Tenants
Part G	Adapted Housing Registers and allocation of adapted housing
Part H	Minor adaptations
Part I	Rapid Response Adaptations

Appendices:

1. Local authority questionnaire
2. R.S.L. questionnaire
3. Voluntary organisations questionnaire
4. List of responding voluntary organisations, list of voluntary organisations visited and interviewed
5. RSL and local authority interview prompts
6. Literature review

EXECUTIVE SUMMARY

- 1.1 A review of Disabled Facilities Grants (DFGs) and other housing adaptations was commissioned by Mrs Edwina Hart, Minister for Social Justice and Regeneration, in December 2003.
- 1.2 The terms of reference sought to examine and arrive at conclusions and recommendations on:
 - a) The effectiveness of the legislative framework
 - b) The adequacy of funding arrangements
 - c) Waiting times for DFGs and adaptations
 - d) The DFG means test, as it relates to disabled dependent children
 - e) Provision of adaptations for council house tenants, including the extent to which DFGs and adaptations are being considered as part of the business planning process and evaluation of options for meeting the Welsh Housing Quality Standard, including stock transfer
 - f) Adaptations for RSL tenants
 - g) Recycling and effective re-use of RSL and LA properties that have already been adapted
 - h) The effectiveness of the Rapid Response Adaptations Programme
- 1.3 The review also incorporated a literature review to ensure that previous relevant research work was considered, in the context of the above key issues.
- 1.4 This report outlines the findings of the review, and gives a series of recommendations.

Section 2 provides the context of DFGs and housing adaptation services, the history and background to current legislative provision for DFGs and adaptations, and how this has evolved over the years through successive policy frameworks

Section 3 reviews previous literature and research, covering 16 previous pieces of work, and identifies some clear common themes from this:

SUMMARY OF KEY RECURRING THEMES FROM PREVIOUS RESEARCH

Positive:

1. Adaptations deliver on a range of key policy objectives, including community care, promoting social inclusion, speeding up hospital discharge, helping prevent hospital admission and reducing strain on carers.
2. Adaptations, once received, make a huge positive impact on end users and generally make a significant improvement to quality of life
3. Adaptations are a cost effective use of public money and provide significant benefits to social care and health services
4. Some (but not all) local authorities use less bureaucratic “minor works” route as a quick and flexible way of providing low cost adaptations. Minor adaptations provide a range of positive and lasting consequences.

SUMMARY OF KEY RECURRING THEMES FROM PREVIOUS RESEARCH

Negative:

1. Very long delays, including occupational therapy assessment waiting time and time to navigate the DFG application process
2. Inadequate information and publicity and confused access to services
3. Poor target setting and performance management by local authorities.
4. The means test for disabled children DFGs is unfair
5. In the main, poor provision for identifying adapted properties and matching persons in need of adaptations, to suitable properties when they become available.
6. A confused picture across different housing tenures, and the need for consistency in how adaptations in different tenures are dealt with
7. Differences in waiting times and levels of service provision depending on the local authority area.
8. Inconsistent practices across local authority areas in relation to how Social Services provide “top up” assistance under Social Care legislation, where DFG does not meet identified needs of individuals
9. Experience of LSVT in England indicates that new RSLs set up at transfer are reluctant to sustain the same level of expenditure previously provided by Council house budgets, putting DFG budget under significant pressure
10. People with sight loss may specifically be accessing services less than people with other types of disability.

Section 4 details the findings of this review. It is divided into nine parts, covering legislation, funding, delays, dependent children DFGs, Council tenants (including stock transfer issues), RSL tenants, adapted property registers, minor adaptations and Rapid Response Adaptations. Under each of these, there is detailed commentary on what the review found, followed by detailed conclusions and recommendations. The summary of key conclusions and recommendations follow.

SUMMARY OF KEY CONCLUSIONS

Legislation

1. The current legislative framework is adequate
2. Most local authorities are failing to provide satisfactory information about DFG and adaptation services
3. Mandatory DFG should remain
4. The provision of minor costing adaptations (those up to £3000, currently delivered through DFG) should be separated from more expensive DFGs
5. Repayment of DFG should be enforceable in certain circumstances
6. Delays to major adaptation work at the end of the DFG process can occur due to the waiting time for planning approvals.
7. DFG/adaptation clients and advocate groups representing clients felt that the legislation, and the administrative processes and systems arising from this was very complicated. The quality of information provided by local authorities was also considered poor by clients and their advocates.

Funding

8. Housing budgets almost entirely meet the cost of DFGs and adaptations
9. The amount of funding allocated to DFGs and adaptations by local authorities increased by 8% (after taking into account inflation) between 2000/01 and 2003/04. Despite this, there continue to be long delays, and there is concern that the demand will increase further over coming years.
10. Increased funding for DFGs, has directly led to reduced funding for the repair and improvement of private sector housing
11. Adaptations for RSL tenants are funded through a mixture of Physical Adaptations Grant (PAG) from the RSL Social Housing Grant Programme and DFG from local authority general capital funding
12. Major Repairs Allowance (MRA) cannot currently be used to fund council tenants DFGs, although the rationale for this is unknown.

Delays

13. The average waiting time for DFGs is too long.
14. Average waiting times are the same irrespective of the scale or complexity of the DFG.
15. There is a wide variation in practice and systems used across Wales. The sharing of good practice across all authorities would lead to improvements to processes across the board
16. The profile of DFGs and adaptation services is not high in terms of local authority corporate performance indicators.
17. There are no current Assembly performance indicators for the delivery of DFG and adaptation services.

Disabled children

18. The current means test does not work well for children DFG cases.
19. The cost of abolishing the means test is estimated at £1-1.5m per year (annual recurring cost) plus an estimated one off additional cost of £2-3m over the first 2-3 years of abolishing the means test.
20. The means test generally, and particularly for younger disabled people, is being reviewed as part of the ODPM DFG review in England. The outcome of this will be considered by the Welsh review at a later date.

SUMMARY OF KEY CONCLUSIONS (CONTINUED)

Council tenants, and stock transfer issues

21. There is a wide range of practice amongst local authorities on how major and minor cost adaptations are delivered to their tenants, leading to different levels of service between areas and tenures
22. There are some examples of good practice in delivering adaptation services in many areas, which could be shared using appropriate dissemination routes.
23. The way in which major and minor adaptations for tenants should be funded if local authorities transfer their stock is unclear, and local authorities are taking different views and approaches to this.
24. Stock transfer may have a potential significant impact on future DFG budgets.

RSL Tenants

25. The estimated value of major adaptations (PAG and DFG) undertaken annually is £2.5m- £3m
26. The existence of two funding routes for major adaptations leads to inconsistency and confusion about how major adaptations are provided for RSL tenants.
27. Practice amongst RSLs in funding minor adaptations varies, leading to inconsistent services for tenants
28. The PAG scheme is not universally known or applied by RSLs and local authorities.
29. Where PAG is used, it can be accessed quicker if RSLs provide private OT reports. This also has the benefit of reducing referrals to the under pressure Social Services OT services. In certain cases, the PAG system itself is too slow, and could be speeded up by streamlined processes such as retrospective claims, and the operation of a central schedule of rates.
30. As with other tenures, the availability of clear information and publicity about available services is unsatisfactory.

Adapted Housing Registers for Social Housing

31. Effective adapted property registers and matching schemes can lead to significant numbers of persons being satisfactorily re-housed, and substantial costs savings for DFG and Housing Adaptation budgets
32. Some schemes have been developed that effectively record and identify properties that have been adapted and then re-use them when they become available for persons needing adaptations.
33. The development and use of adapted register and matching schemes is low. There is evidence in some areas that little thought is given to matching adapted properties to persons needing them.

Minor adaptations

34. Minor adaptation services are inconsistently defined, funded and delivered across housing tenures and between different parts of Wales.
35. There are examples of good practice in delivering adaptation services in many areas, covering all tenures, which could be shared using appropriate dissemination routes.

Rapid Response Adaptations Programme

36. RRAP has been highly successful in delivering a quick and effective programme of minor adaptations and small repairs that have made a real difference in allowing people to return home from hospital and care, and in preventing admissions and re-admissions.
37. RRAP is highly valued by local authorities and health service providers, and has facilitated closer partnership work between service providers in these different sectors
38. The scheme is oversubscribed, and there is clear evidence that money allocated falls short of what could be spent
39. More than 50% of local authorities Housing and Social Services have topped up RRAP budgets , or in some cases developed parallel schemes using the referral mechanisms and networks set up through RRAP.
40. Resources to supplement RRAP from local Health service providers has, with only one exception, not been provided, despite its success and popularity with Health professionals.
41. There is a case for investigating the possibility of extending a RRAP type scheme to council and RSL tenants, so that the benefits identified above can be delivered irrespective of tenure.

SUMMARY OF KEY RECOMMENDATIONS

Legislation

1. The current legislative framework should remain.
2. The production of clear publicity and information about DFG and adaptation services should be a core set requirement for the Assembly's performance framework for local authorities.
3. A National Assembly information booklet should be produced for clients and service users, setting out the types of services available, the roles and responsibilities of Housing and Social Services, and desirable standards of performance.
4. The method of providing adaptations up to the cost of £3000, that are currently provided through DFG, should be streamlined and made less bureaucratic. The way of achieving this needs to be examined in detail. Options to be explored include the use of secondary legislation, developing a new scheme and funding stream in Wales, linked to the better provision for independent living and other Wanless report recommendations, and lobbying for a change to primary legislation on DFGs to facilitate this.
5. The UK Government should be lobbied to add to primary legislation the ability to reclaim DFG on sale, within time limits. In the meantime, local authorities should be reminded of their ability to introduce local conditions by application to the Assembly.
6. The ability to fast track DFG and major adaptations for disabled people through the planning system should be examined in detail

Funding

7. The mandatory nature of DFG and the need to properly resource the DFG programme should be reinforced to all local authorities.
8. The calculation of the Housing formula for un-hypothecated general capital allocations should be reviewed to ensure it reflects levels of disability locally and actual demand for DFGs.
9. The funding allocation as a result of the housing formula should keep pace with the anticipated increase in demand for DFGs in future years
10. To complement the recommendation to have a separate fast track route for DFG works costing up to £3000, consideration needs to be given to the funding source for such works, and the merits of using any finance available as a result of the Wanless report.
11. Major Repairs Allowance should be useable for Disabled Facilities Grants for council tenants. Local authorities should be informed of this change for the for the next financial year (2005/6)

Delays

12. The detailed comparative and benchmarking work undertaken under this review should be prepared as a separate report and issued to local authorities and RSLs in order to encourage the sharing of best practice in DFGs and adaptation services.
13. A series of seminars presenting the outcomes of:
 - the Wales DFG review
 - the Phase 2 WLGA benchmarking and good practice report (when completed)
 - ODPMs "Delivering Adaptations, a Good Practice Guide" ;should be organised in partnership with organisations such as CIH Cymru, WFHA and Care and Repair Cymru.
14. A separate fast track route for DFG works costing up to £3000 should be introduced as detailed elsewhere

SUMMARY OF KEY RECOMMENDATIONS (CONTINUED)

15. A statutory PI should be introduced that sets a target and measures the process of undertaken DFG and major cost adaptations in all tenures, from the first point of contacting the local authority to the completion of work.

Disabled children

16. The means test for dependent children DFGs should be abolished, with additional costs funded by the Assembly.

17. The conclusions of the wider review of DFG means testing being undertaken by ODPM in England should be considered in Wales when complete.

Council tenants

18. A framework should be set in place that requires a greater level of uniformity for the delivery of council tenant adaptations. This should include:

- A clear definition of what are considered minor adaptations (those costing less than £1000), and a common un-bureaucratic route for delivering these, outside of the DFG system
- A NAWPI covering the time-scale for delivering council tenant major adaptations.

19. That good practice in delivering adaptation services for tenants be shared through the dissemination routes described in recommendations to Part C.

20. That a clear policy lead and guidance is given to local authorities that requires them to build into business plans and transfer agreements, all major and minor adaptation costs for bringing their stock up to the WHQS.

RSL Tenants

21. All RSL major cost adaptations should be undertaken using PAG funding, from SHG

22. Minor adaptations costing less than £1000 should be made the responsibility of the RSL, and not eligible for PAG or DFG.

23. The PAG scheme should be overhauled and clarified in terms of eligibility, minimum and maximum costs, eligible work, and paperwork required to be submitted. As far as possible PAG should match provision under the DFG system

24. The PAG scheme should be clearly publicised amongst all RSLs

25. To speed up adaptation works, retrospective claims for PAG should be allowable, subject to clear checks and balances to ensure such claims fully comply with PAG requirements

26. Consideration should be given to the operation of a central schedule of rates for PAG works.

27. Information about available routes to adaptations for RSL tenants should be published, as part of the general information/ publicity material proposed elsewhere in this report.

Adapted Housing Registers for Social Housing

28. The best schemes and systems should be replicated across Wales. This could be facilitated by the sharing of information collected as part of this review and/or a series of best practice seminars for L.A.s and RSLs, facilitated by the Assembly and organisations such as WFHA and CIH

29. Local Authorities should be reminded of the benefits of adapted housing registers and matching schemes in relation to their own housing stock, and should be required to include their plans for such schemes within their local housing strategy and private sector renewal strategy.

SUMMARY OF KEY RECOMMENDATIONS (CONTINUED)

Minor Adaptations

30. Minor adaptations should be clearly defined. It is suggested that the definition should relate to cost, and that all adaptations costing under £1000 be classed as minor.
31. Delivery of minor adaptations (under £1000) through less bureaucratic mechanisms should be promoted
32. The funding of minor adaptations costing £1000 or less should be made the responsibility of Social Services for owner occupiers and private tenants, RSLs for RSL tenants, and Housing Departments for Council House tenants, and the mechanism for the best way of achieving this examined in detail
33. The use of non OT qualified staff should be encouraged and promoted for minor adaptations.

Rapid Response Adaptations Programme

34. That the RRAP programme is confirmed as continuing beyond the initial 3 year pilot proposal
35. That money allocated to the programme is increased to reflect actual demand for RRAP, within the clearly defined parameters of the programme aims and eligibility
36. That consideration is given to the source of funding for the programme in future years, so that this reflects what the programme delivers in terms of health and social care objectives.
37. That consideration be given to a RRAP type programme covering social housing tenures, with due regard to delivery through the networks and partnerships already developed.

REVIEW OF HOUSING ADAPTATIONS IN WALES

SECTION 1 INTRODUCTION

Background to the review

- 1.3 A review of Disabled Facilities Grants (DFGs) and other housing adaptations was commissioned by Mrs Edwina Hart, Minister for Social Justice and Regeneration, in December 2003
- 1.4 A scoping paper was produced and the review commenced in May 2004. From the scoping paper, a terms of reference was developed. The terms of reference sought to examine and arrive at conclusions and recommendations on:
- a) The effectiveness of the legislative framework
 - b) The adequacy of funding arrangements
 - c) Waiting times for DFGs and adaptations
 - d) The DFG means test, as it relates to disabled dependent children
 - e) Provision of adaptations for council house tenants, including the extent to which DFGs and adaptations are being considered as part of the business planning process and evaluation of options for meeting the Welsh Housing Quality Standard, including stock transfer
 - f) Adaptations for RSL tenants
 - g) Recycling and effective re-use of RSL and LA properties that have already being adapted
 - h) The effectiveness of the Rapid Response Adaptations Programme
- 1.3 The review also incorporated a literature review to ensure that previous relevant research work was considered, in the context of the above 8 key issues.

The review process

- 1.4 The review process has aimed to be as inclusive as possible. It has sought the views of many stakeholders and has employed a number of methods as follows:
- a) Postal questionnaires were sent and returned from all 22 Welsh local authorities (Appendix 1)
 - b) Postal questionnaires were sent to 28 Registered Social Landlords, 21 responses were received (Appendix 2)
 - c) Visits and interviews have been held with all with 22 Welsh local authorities
 - d) Visits and interviews have been held with 6 RSLs

- e) A questionnaire was sent to key partners and voluntary/advocacy agencies to ask for their views about the DFG system (Appendix 3). A list of all agencies who returned questionnaire is listed at Appendix 4
- f) Visits and interviews were held with X of these agencies (Appendix 4)
- g) 11 clients who had been through the DFG system have returned questionnaires, or were visited and interviewed
- h) The Office of the Deputy Prime Minister (ODPM) in England also commissioned a review of DFGs in 2004/2005, and the steering group for this review included the reviewer and a representative from the Welsh Assembly Government
- i) In order to ensure that systems and procedures outside Wales were also considered, meetings have been held with an English authority (Bristol), the Scottish Executive, Edinburgh City Council and the Northern Ireland Housing Executive.
- j) Internal Assembly consultation.
- k) Presentations have been made and feedback received from a number of seminars, notably the College of Occupational Therapists Specialist Section in Housing annual conference, Care and Repair Cymru Annual Conference, the North Wales Grant Officers group meeting, and Wales Heads of Environmental Health seminars in North and South Wales

1.5 The interviews with Local Authorities were conducted with groups of officers representing Social Services, Private Sector Housing Services and Council House Maintenance/Adaptation Teams. Officers attending were at service manager/principal officer level and above so that views elicited were from decision makers. Copies of the aide memoires to assist visits/interviews with local authorities and RSLs are shown at Appendix 5.

1.6 The information derived from all of the consultation summarised above has been fundamental in forming the “findings”, conclusions and recommendations of this review.

SECTION 2 BACKGROUND AND HISTORY OF THE LEGISLATION AND SYSTEM

Context of DFG/Adaptation services

- 2.1 The purpose of providing an adaptation is to adapt disabling environments in order to restore independent living. It is about providing an individualised solution to the problems of people experiencing a disabling environment rather than just being about building works or providing equipment. This approach, fully supported by the National Assembly, is often referred to as the social model of disability, as opposed to the medical model that focuses on the functional deficits of individuals.
- 2.2 The number of people needing adaptations is increasing. People are living longer due to continual improvements in medical practices, and healthier lifestyles. The picture in Wales is that, over the last century, the proportion of the population aged 60 and over has more than trebled. Demographic projections for the next 20 years indicate only a slight overall population growth (3%), but within this there will be a much larger proportionate increase in older persons. Projections indicate an increase of 11% of people at retirement age (around 65,000 more people), and a 33% increase in people aged over 85 (around 21,000 more people aged over 85). The context of DFG/adaptation services is therefore one of increasing demand, and of the need to build capacity to cater for the needs of an ageing population, and in particular helping them to remain living independently at home, rather than in social or medical care facilities.

National policy context

- 2.3 The national housing strategy **Better Homes for People in Wales, 2001**, gives a clear commitment to ensuring equality of opportunity, supporting vulnerable and disadvantaged groups, and developing housing policy that meets the needs of specific groups. The strategy states that “we will ensure that all vulnerable households have access to specialist housing advice and any support and adaptations they may need to remain in their own homes”. There is specific commitment to examining the current funding arrangements for the provision of physical adaptations across all housing tenures, and to the better use of adapted housing through promoting matching of adapted housing to people in need of them.
- 2.4 One of the 5 stated key aims of the National Assembly’s **Strategy for Older People in Wales, 2003**, is *“to promote the provision of high quality services and support which enable older people to live as independently as possible in a suitable and safe environment and ensure that’s services are organised around and responsive to their needs”*.

2.5 The report of the National Assembly's Social and Regeneration Committee **Housing for Older People, 2004**, makes a series of recommendations that include the following in relation to DFGs and housing adaptations:

- **Recommendation 7**

Seeking solutions to the continuing shortage of occupational therapists, establishing best practice and providing guidance on best use of available professionals

- **Recommendation 8**

Including in the DFG review:

- Adequacy of resource provision
- Making representations to the UK government on eradicating means testing and setting the VAT rate for all works to meet the needs of disabled people at the lowest possible level
- Ensuring that funding arrangements across all tenures ensures equality of outcomes
- The effectiveness of adaptations in promoting independence as opposed to emphasising functional deficit
- Involving disabled people and carers in the design and evaluation of services

- **Recommendation 10**

The Assembly should explore the introduction of a funding stream that supports innovative projects at the intersection of health and housing concerns.

2.6 Older Persons NSF Framework objectives

2.7 The **Assembly's National Service Framework for Children, Young People and Maternity Services in Wales** (consultation document issued in 2004) contains 7 core aims for children in Wales. Amongst these are to ensure that children "*have a safe home and community which supports physical and emotional well being*" and that children "*are not disadvantaged by poverty*". More specifically in relation to disabled children and young people, Chapter 5 of the Children's NSF identifies that "*disabled children and their families face many social and physical barriers to full participation in society. It is not only disabled children's impairment which determines their quality of life, but also negative attitudes and a disabling environment, for example.....housing....*". A particular aim of this review is therefore to identify whether the current DFG system is disadvantaging disabled children through the means testing provisions, and to determine whether access to adaptation services helps fulfil the aims of the Assembly's Children's NSF.

2.8 A report published by the Prime Minister's Strategy Unit in January 2005, "**Improving the Life Chances of Disabled People**", sets out a long term policy agenda for action needed to improve the quality of life of disabled people.

The report identifies a need for practical action in four key areas:

- achieving independent living
- improving support for families with young disabled children
- transition into adulthood
- support and incentives for getting and staying in employment

The role of Housing is recognised as a key component to independent living, and three main areas are noted:

- adaptations to existing properties
- more effective use of accessible/adapted properties
- wider application of Lifetime Home Standards in both new build and the existing stock

The report identifies some specific problems with the current DFG system, including:

- a means test that does not take into account mortgage repayments or expenditure on young children, and does not disregard earned income in order to avoid creating disincentives to work
- the upper cost limit of DFG
- lengthy administration and delays in processing DFGs

Although the report is UK based, with no Wales specific elements, it is important that the DFG/adaptation review in Wales notes and considers the general policy direction and some of the specific DFG /housing adaptation issues identified as needing improvement.

- 2.9 This review investigates all the themes and matters described in the above documents, and provides a series of conclusions and recommendations relating to these and other issues.

Summary of the current DFG/Adaptation System

- 2.10 DFGs are mandatory grants available to help disabled people to remain living independently in their own homes. Local authorities therefore have a duty to provide DFGs. The grants are means tested and available to persons living in all housing tenures, including owners, council tenants and RSL tenants. In practice, local authorities have developed different ways of providing adaptations in the different tenures. DFGs are available in all cases to owner occupiers and private tenants, but for council tenants, and RSL tenants, approaches vary eg some local authorities use resources from their housing revenue accounts to fund adaptation for their own tenants, and RSLs can access Social Housing Grant (Physical Adaptations Grants) direct from the Assembly for their tenants.
- 2.11 The means test for DFGs is based on the test for housing benefit, and works on the principle of determining the size of a loan the applicant could afford to

raise. Applicants at or below the threshold for means tested benefits do not have to contribute. Those on low incomes contribute small amounts, while those on higher incomes often have to meet most or all of the cost of works. A widely accepted weakness of the means test is the allowance for housing costs, which does not reflect the reality of actual mortgage payments or rents.

- 2.12 The DFG/Adaptation system is characterised by a two stage approach to determining eligible adaptation works. The Welfare Authority (in practice Social Services Occupational Therapy teams) determine what works are “**necessary and appropriate**” to meet the disabled persons needs, and the Housing Authority determines what works are “**reasonable and practicable**”, resulting in a schedule of works being sent to the applicant which forms the basis of grant aided work. The involvement of two parts/functions of the local authority, and in some cases more than this if there are decentralised teams and/or separate teams dealing with council tenants adaptations, leads to a complex process and confused system for applicants.

History and summary of relevant legislation

- 2.13.1 **The NHS and Community Care Act 1990**, set the framework for the new policy of “Care in the Community” at the time. The clear policy objective was to help persons remain living in their own homes and in their own communities rather than living in residential or institutional care. By 1992, joint circulars and guidance issued by Government Departments emphasised the importance of housing in making community care work. When the legislation came into effect in 1993, local authorities were given the lead role in the provision of “Care in the Community”. Resources previously held by the Department of Social Security to cover the costs of housing people in care, were transferred to Social Services Departments. However, no specific financial provision was identified or made available within the Care in the Community policy framework for work to enable persons to live independently at home. There was also no clear picture of how the policy would be funded over time, having regard to demographic changes in the numbers of older and disabled persons within the population.
- 2.14 **In 1989, the Local Government and Housing Act** introduced a new mandatory grant called Disabled Facilities Grant (DFG). The delivery mechanism and funding stream for this grant followed the traditional pattern of housing grants. It became a part of “private sector housing renewal programmes” delivered by Teams of Environmental Health Officers/Surveyors and support staff in Housing and Environmental Health Departments ie part of the wider programmes of housing grants for repairing, renewing and improving private sector housing conditions. The 1989 Act was replaced by the **Housing Grants, Construction and Regeneration Act**

1996. The 1996 Act made all housing grants discretionary, except for DFG where mandatory entitlement was retained. Sweeping changes and increased flexibility for all other types of housing grants were made under the **Regulatory Reform (Housing Assistance) (England and Wales Order) 2002**. However, mandatory entitlement to DFG remains unchanged and still currently applies under the 1996 legislation. The current maximum DFG in Wales is £30,000 (less any means tested contribution).

- 2.15 The **2002 Regulatory Reform Order** provisions give local authorities wide ranging powers to provide assistance and enables local authorities to supplement mandatory DFG in any way they see fit. This could include top up grant over the maximum limit, introducing a local means test for particular groups, providing minor cost adaptations outside the DFG system, and providing loans or equity release products to help provide adaptations. Local authorities in Wales determine their own priorities for using these discretionary powers, and the amount of finance they use to support this. In practice, different types of assistance, with different emphases have evolved in different local authorities since 2002. Assembly Circular Guidance 20/02 gives detailed advice about the current legislative framework for mandatory DFG and discretionary other types of assistance through RRO provisions.
- 2.16 Unlike repair and renovation grants, DFGs are also statutorily available to council tenants and RSL tenants. However, the way in which adaptations have been delivered to tenants varies between each local authority area. Some local authorities provide DFGs to their tenants, while others provide “housing adaptations” paid for through their housing revenue accounts as part of their wider programmes of improvement for council housing. Some local authorities do both.
- 2.17 For RSL tenants, DFGs are also a mandatory entitlement. In practice, the way in which adaptations are provided for RSL tenants varies. In some areas, DFG is accessed by tenants, in other areas, the RSL organise work themselves and fund this through Social Housing Grant (Physical Adaptations Grant). In some areas, both avenues are used.
- 2.18 An important partner in the delivery of adaptations under the 1996 Act, are Social Services Departments, and in particular, Occupational Therapy Teams. Occupational Therapists have a key role in prescribing adaptations required by the disabled person, and making recommendations accordingly to Housing/Environmental Health Departments.
- 2.19 Social Services also have **specific** responsibilities under many other pieces of legislation. Of particular importance in relation to housing adaptations are:
- a) The Chronically Sick and Disabled Persons Act 1970 and
 - b) The Children’s Act 1989.

Section 2 of the Chronically Sick and Disabled Persons Act 1970 states (amongst other things) that local authorities have a duty to arrange:

- An assessment of needs of disabled people for adaptations in their home
- Any works of adaptation in their home

In practice, in the vast majority of cases, this duty is discharged by the Housing Authority providing a DFG. However, this is not always the case. In many authorities, Social Services provide minor adaptations directly without recourse to DFG. Also, DFG cannot always meet the identified need either because grant applicants are assessed as having a means tested contribution (which applicants sometimes say they cannot afford) or because the cost of the adaptation is more than the amount of the maximum mandatory grant. In such cases, it is clear that local authorities, and in particular Social Services, still have a duty to help provide for the need identified by occupational therapists, and should have in place clear policies and practices through which they fulfil their responsibilities under the Chronically Sick and Disabled Persons Act.

The Children's Act 1989 requires local authorities to provide a range of family support services for children in need. The definition of children in need includes disabled children. The Act places a duty on local authorities to provide services to minimise the effect on disabled children of their disabilities, and give such children the opportunity to lead lives which are as normal as possible. Section 17 of this Act states that in exceptional circumstances, services provided may include giving cash assistance, which may be unconditional or subject to conditions on repayment (but not repayable if in receipt of income support or family credit). This duty to meet a child's need could arise if DFG cannot meet that need due to the DFG means testing provisions.

SECTION 3 LITERATURE REVIEW

- 3.1 Numerous studies and reviews of disabled facilities grants and housing adaptations have been undertaken over the past ten years. This review, which is specific to the effectiveness of current arrangements in Wales, has aimed not to replicate these other studies and reviews (although inevitably there is some duplication and cross over)
- 3.2 However, to help set the scene and context, and to highlight some of the key concerns of previous researchers and commentators a literature review has been undertaken and the detail of this can be seen at Appendix 6. Below is a summary of the studies/ publications looked at and a summary of the most common themes and findings. Much of the research relates to Wales and England combined. In general terms, the legislative framework is the same in both countries and the same types of problems with the system can be seen. It is however important to recognise that the funding arrangements for both countries differ, and generally speaking the pro rata funding of DFG and adaptations in Wales has been higher than in England.

Publication/study name	Author	Year	Study area
1. Adaptations, finding ways to say yes	Heywood	1994	Wales and England
2. Funding Adaptations, the Need to Co-operate	Heywood and Smart	1996	Wales and England
3. Disabled Facilities Grants, is the system working?	Age Concern, RADAR	1999	Not specified
4. Changing Rooms, a survey of the adaptations service in six Welsh authorities and the outcomes for service users with physical disabilities	Higham	1999	Wales
5. Money well spent: The effectiveness and value of housing adaptations	Heywood	2001	Wales and England
6. Older people and Participation within Disabled Facilities Grant Processes, British Journal of Occupational Therapy	Awang	2002	England
7. Housing for Disabled People, Equal Adaptations	Appleton, Wilson	2003	Wales
8. The Impossible Took a Little Longer	McKeever	2004	Northern Ireland
9. Building in Evidence: Reviewing Housing and Occupational Therapy	Awang	2004	United Kingdom
10. In Sight of Home, Meeting the Needs of People with Sight Problems	Rees	2004	Wales

CONCLUSION- SUMMARY OF KEY RECURRING THEMES FROM PREVIOUS RESEARCH

The purpose of the literature review is to ensure that a clear picture of problems and concerns with the DFG and Adaptations system in Wales is built up from the substantial amount of previous research already undertaken in this field. This supplements the research and consultation undertaken directly through this review. A summary of the main recurring themes is:

Positive:

1. Adaptations deliver on a range of key policy objectives, including community care, promoting social inclusion, speeding up hospital discharge, helping prevent hospital admission and reducing strain on carers.
2. Adaptations, once received, make a huge positive impact on end users and generally make a significant improvement to quality of life
3. Adaptations are a cost effective use of public money and provide significant benefits to social care and health services
4. Some (but not all) local authorities use less bureaucratic “minor works” route as a quick and flexible way of providing low cost adaptations. Minor adaptations provide a range of positive and lasting consequences.

Negative:

1. Very long delays, including occupational therapy assessment waiting time and time to navigate the DFG application process
2. Inadequate information and publicity and confused access to services
3. Poor target setting and performance management.
4. The means test for disabled children DFGs is unfair
5. In the main, poor provision for identifying adapted properties and matching persons in need of adaptations, to suitable properties when they become available.
6. Confused picture across different housing tenures, and the need for consistency in how adaptations in different tenures are dealt with
7. Differences in waiting time and level of service provision depending on the local authority area.
8. Inconsistent practices across local authority areas in relation to how Social Services provide “top up” assistance under Social Care legislation, where DFG does not meet identified needs of individuals
9. Experience of LSVT in England indicates that new RSLs set up at transfer are reluctant to sustain same level of expenditure previously provided by Council house budgets, putting DFG budget under significant pressure
10. People with sight loss may specifically be accessing services less than people with other types of disability.

SECTION 4 REVIEW FINDINGS

- 4.1 This Section details the information and feedback received through the variety of consultation methods with local authorities, RSLs and user advocate groups.

PART A LEGISLATION

- A1.1 The legislation affecting DFGs and adaptations is complex and diverse, as described in Section 2. On the one hand it contains all necessary powers and provisions for a local authority to provide an effective DFG and adaptations service. On the other hand, the legislative framework is so wide that local authorities can end up not undertaking certain functions because of an assumption that this will be carried out elsewhere. For example, all authorities rely on the mandatory DFG system for meeting assessed needs for major adaptation work. However, where DFG cannot be accessed, (eg because of the means test or maximum DFG limit), some authorities do not consider fully their wider responsibility as a Welfare authority under the Chronically Sick and Disabled Persons Act 1970 (CSDPA).
- A1.2 In the main (67%), local authorities did not have specific written policies in relation to funding and duties under CSDPA and Children's Act. However, there was widespread recognition that this duty did exist where a DFG could not be provided. Most authorities acknowledged that they needed to address this issue locally.
- A1.3 Local authorities agreed that because responsibility for different pieces of legislation lay in different departments, there was sometimes confusion. However, every authority felt that the legislative framework did work, and that their internal structures and joint working arrangements, rather than the legislation, was the critical factor in delivering good quality adaptation services. Organisational and joint working arrangements between Housing and Social Services were thought to be constantly improving due to:
- Introduction of unitary authorities across Wales in 1996
 - Availability of Assembly Circular Guidance relating to provision of DFGs and adaptations, the latest of which is Circular 20/02
 - DFG / adaptation benchmarking and good practice work facilitated by SYNIAD with participation by all local authorities in Wales over the past 4 years, along with publications such as the Desk Top Guide to Adaptations recently produced by the ODPM.
- A1.4 Capital budgets are allocated to local authorities on an un-hypothecated basis. The DFG programme is therefore in competition with other programmes such as transport, leisure, education and social services. Every local authority felt strongly that the mandatory entitlement to DFG under

legislation should stay because this has been, and would remain a strong lever for making the case locally for funding the DFG programme in line with demand.

- A1.5 Problems exist in certain areas in relation to multiple DFG applications ie “serial movers” receiving multiple grants over a short period, and sometimes benefiting from an increase in property value where the property has been extended. There was also some concern that extensions in particular were occasionally not used for the disabled applicant. Although not a universal or widespread problem, local authorities were keen to have the discretion to claw back DFGs where a clear misuse or abuse of the system could be shown.
- A1.6 Groups representing users and users themselves felt that the system was very confusing. This stemmed from the fact that there were different responsibilities for different parts of the process in different places. This was acceptable if local authorities had clear access points into the service and clear publicity and information material setting out the different stages of the process. In practice, the quality and availability of information varied between different areas and the general view was that publicity and information was poor.
- A1.7 Some local authorities, RSLs and user groups commented that a significant delay in major works was the time taken to receive planning consents, from the relevant local authority departments. This was a common problem identified by many authorities. However, there was uncertainty whether there was no flexibility in planning legislation to fast track works of adaptation for disabled people, or whether there was flexibility but planning officers locally chose not to use this.
- A1.8 Many local authorities and client advocate groups commented that the current legislation relating to mandatory DFG (and consequently the process and time-scale) is the same, irrespective of whether a small adaptation such as a stair-lift is required, or a major adaptation involving lengthy and expensive construction work is needed eg extensions. This is something that client groups and local authorities felt could be addressed by amending parts of the current mandatory DFG system. As previously set out, local authorities have powers under the RRO 2002 to provide discretionary assistance, and some authorities use this to try to provide minor cost adaptations more quickly. However, because of the discretionary nature of RRO powers, and the difficulties experienced locally to funding discretionary works, a more consistent, cross Wales, way of funding minor cost adaptations outside the DFG system is desirable.

LEGISLATION - CONCLUSIONS

1. The current legislative framework works where joint working policies, practices and organisational arrangements between Social Services and Housing Departments are adequate.
2. With only a few exceptions, local authorities are failing to provide adequate and sufficient information about DFG and adaptation services available in their areas.
3. The mandatory nature of DFG under legislation provides a clear focus and priority for DFG programmes.
4. Undertaking all types of adaptation, irrespective of scale or cost within the same mandatory legislative process is a weakness. Local authorities have discretionary powers to provide minor adaptations but in practice, such provision is patchy across Wales.
5. There are provisions for individual local authorities to request permission from the Assembly to adopt local conditions, which could include clawing back DFGs in cases where there has been clear abuse or mis-use of the system. However, there is no universal provision in the legislation for this.
6. Flexibility within the planning system to fast track applications relating to adaptation works for disabled people needs to be investigated.

LEGISLATION- RECOMMENDATIONS

1. The current legislative framework should remain, but local authorities should ensure that their adaptation services, provided within this framework, are clear, transparent and easily accessible by users.
2. The production of clear publicity and information about DFG and adaptation services should be a core set requirement for the Assembly's performance framework for local authorities.
3. A National Assembly information booklet should be produced for clients and service users, setting out the types of services available, the roles and responsibilities of Housing and Social Services, and desirable performance. This should include the role of Social Services where persons cannot access DFG , or where DFG is not the full solution These can be disseminated in a variety of ways, including through local authorities, TPAS, Care and Repair Cymru and the network of Care and Repair Agencies across Wales.
4. The future provision of adaptations costing under £3000 should be outside the existing DFG framework. How this can be achieved should be carefully considered. The following routes should be investigated:
 - i) Whether a "Minor DFG" grant could be introduced through Assembly powers/secondary legislation
 - ii) Whether a scheme can be developed in Wales, linked to Assembly and Wanless objectives such as promoting independent living and delayed transfer of care.
 - iii) Lobbying the UK government to amend primary legislation to enable provision of mandatory minor adaptations in a more streamlined wayThe selected route should ensure that mandatory entitlement is retained, bureaucracy is kept to a minimum, and joint working between social services and housing in relation to assessment of need, approval and organisation of work is significantly more streamlined. Eg non means tested, flexibility not to require that an OT assessment be provided in individual cases (but requiring Social Services consultation about standard specification of items that are frequently provided such as level access showers or straight track stair-lifts)
5. The flexibility to reclaim DFG on sale, within time limits, should be added to the current primary DFG legislation. This should only cover works that increase the capital value of properties and grant recipients move within a certain time scale, or where there is evidence that extensions/additional rooms are not being used for the disabled person who the room/adaptation was provided. Authorities already have the power to request that the Assembly approve the use of local conditions, which could include reclaiming on sale, and authorities should be contacted to remind them of their ability to do this.
6. Investigate whether fast tracking of works of adaptation for disabled persons could be added to the Planning system

PART B FUNDING

B1.1 The questionnaires sent to local authorities and RSLs, revealed the following information about levels of funding, sources and trends over recent years :

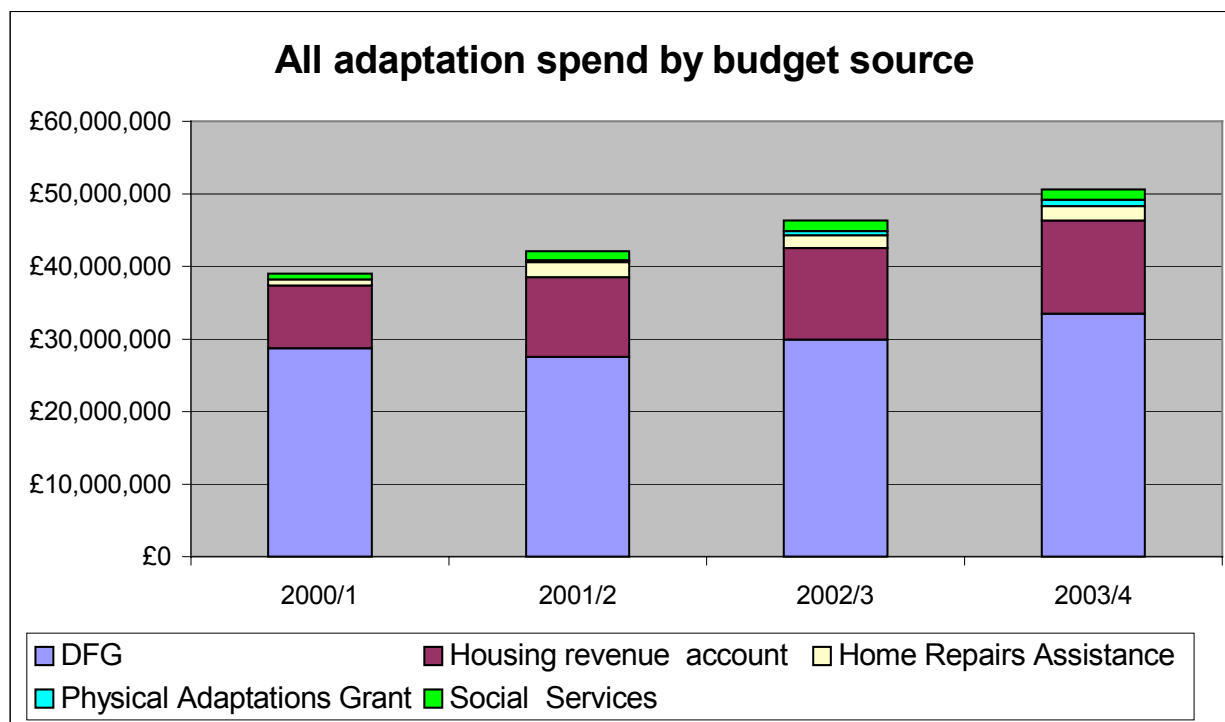
- Spend on DFG has increased from £29 million in 2000/2001 to £34 million in 2003/2004, an increase of 17%. When inflation at 2.5% per year is factored in, the increase is 8%.
- Overall spend on Housing adaptations, including DFG, housing revenue account and Social Services funding has increased from £39 million in 2000/2001 to £51 million in 2003/2004, an increase of 31%. Net of inflation, this increase is 20%. (See graph 1 below)
- Housing expenditure accounts for 97% of adaptation funding, Social Services expenditure accounts for 3% and Health 0%
- DFG funds 68% of housing expenditure, housing revenue account funds 26% of housing expenditure on adaptations
- 28% of DFGs cost under £3,000, 58% of DFGs cost under £5000 (see graph 2 below)
- 67% of Social Services Departments do not have policies or procedures for providing adaptations, where DFG could not be accessed or was not the full solution.
- The total funding demand for RSL tenants is approximately £3m per year. Currently, this is met through approximately £1m “Physical Adaptations Grant” (PAG) funding direct from the Assembly to RSLs, and approximately £2m per year as DFG to RSL tenants from local authorities.

Table 1 Funding adaptations in Wales, 2000 to 2004

	DFG	Housing revenue account	Home Repairs Assistance*	Physical Adaptations Grant	Social Services	Total
2000/1	£28,770,328	£8,571,946	£846,415	£0	£815,337	£39,030,885
2001/2	£27,512,300	£10,982,580	£2,063,099	£271,637	£1,208,790	£42,045,321
2002/3	£29,892,413	£12,604,316	£1,806,192	£564,430	£1,411,690	£46,332,612
2003/4	£33,498,000	£12,832,212	£2,020,671	£806,789	£1,394,200	£50,616,783

*NB from July 2002, local authorities could introduce their own grant/assistance schemes under Regulatory Reform Order provision. This column contains a mix of residual Home Repairs Assistance spend, and spend on small repair /adaptation grants introduced locally since July 2002.

Graph 1 Funding adaptations in Wales, 2000-2004



B1.2 General capital funding provided to local authorities is un-hypothecated and it is for each local authority to decide its own priorities for spending its capital allocations. There is clear evidence that because DFGs are mandatory grants, their funding from local authority single capital allocations is generally given a relatively high priority. Despite this, some managers interviewed (ie those responsible for delivering DFG services) indicated that DFG funding allocations made locally were insufficient to meet need.

B1.3 Many authorities were also concerned that funding in the future may not keep pace with the projected increased demand for DFG (as a result of an increasingly older person population) given the competing priorities of other local programmes. This was already being seen in those authorities who had seen a significant increase in demand for DFG in recent years, or who had dealt with waiting times for occupational therapy assessments, but the bottleneck had effectively been passed from Social Services to Housing because there was insufficient DFG funding made available to resource the increased numbers of assessments by OTs.

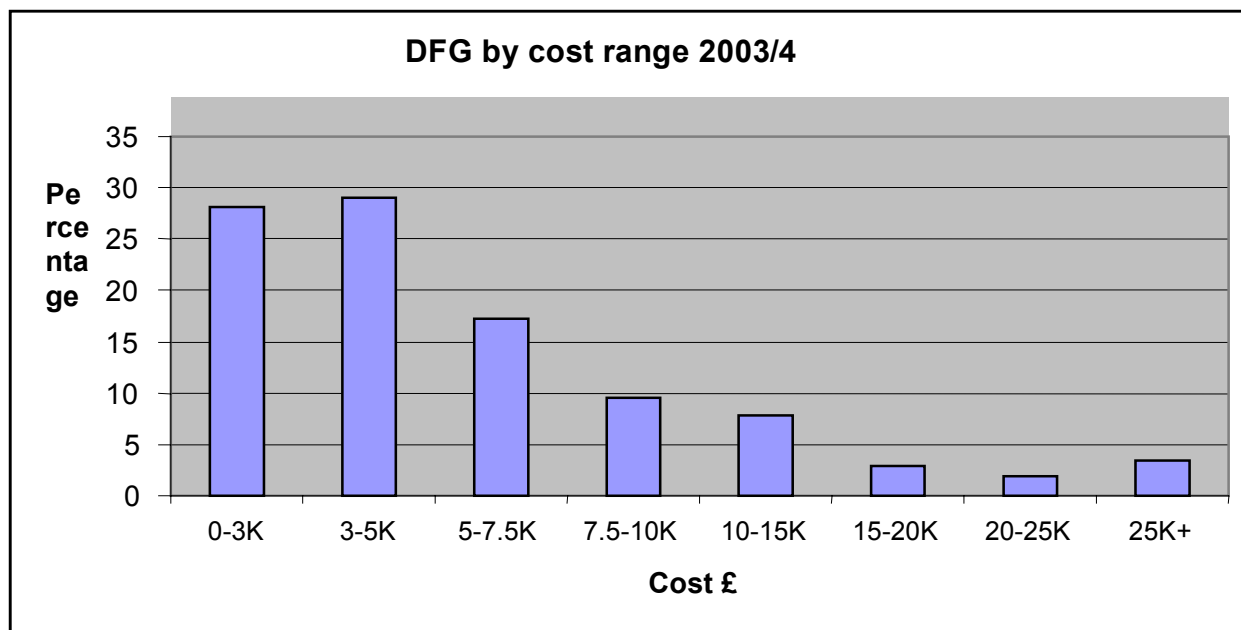
B1.4 There was also a strong statement from local authorities that whilst DFG budgets were given a relatively high degree of priority from single capital allocations, this in practice was at the expense of other private sector housing renewal budgets for implementing repair, renovation and strategic schemes. In practice, budgets for private sector renewal have therefore decreased locally, and DFG service managers interviewed reported that their

ability to fund schemes under Housing Regulatory Reform etc 2002 provisions (often these were to carry out quicker small scale adaptations, safety at home and hospital discharge schemes), was therefore being compromised.

- B1.5 The fact remains that it is for the local authority to determine how it allocates its general capital budget locally to meet local priorities. However, there is a case for increasing future allocations of general capital funding from the Assembly in line with increased demand for DFGs. The mechanism for achieving this could be by reviewing the formula for funding the housing element of the general capital allocation, so that it reflects the picture of increasing demand for DFG.
- B1.6 From the client and client user groups perspective, inadequate DFG capital funding **was** reported to be a problem, and lack of funding was sometimes given as the reason for delays. A few examples were given of cases that had to wait until the next financial year's allocation of budget had been made before being progressed.
- B1.7 Major Repairs Allowance (MRA) was introduced in 2003/4 as the funding mechanism from the Assembly to local authorities for the maintenance, repair and improvement of council housing stock. Current guidance on the use of MRA excludes local authorities from funding DFGs from MRA for council properties. There was widespread concern and uncertainty about why this was, especially given the other pressures on private sector renewal budgets set out in B1.3 above. The Welsh Housing Quality Standard, to be met by all local authorities for their council housing by 2012, includes ensuring that homes, as far as possible, suit the specific requirements of the household. This would clearly include for persons with disabilities. Guidance on the WHQS notes that the home should provide all necessary aids and adaptations to meet the specific requirements of any household members, including those with disabilities. The current rule of not allowing the use of MRA for DFG in effect directs authorities to use other resources for council tenant DFGs, including general capital funding where DFGs and private sector renewal funding are in competition for resources with other council services. Also, where authorities wish to structure their services into single teams and undertake council tenant adaptations as DFGs (with the same processes and service standards for all tenures), but meeting their costs through housing revenue account/MRA, they are in effect being restricted from doing so. Authorities therefore stated a desire to have the flexibility to use MRA to fund DFGs for their own tenants.
- B1.8 Analysis of the cost ranges of DFG show that a large proportion of DFGs (28%) cost less than £3000 and 58% cost less than £5000. The cost ranges are shown in graph 2 below. As stated above under "Legislation findings" (A1.8), it is questionable whether these lower costs adaptations (eg straight

stair-lifts, level access showers) need to follow the same bureaucratic route of OT assessment, grant application process and means testing as major, and more complex works costing up to £30,000 or whether there is a quicker, less bureaucratic route for these “minor DFGs”.

Graph 2 Average cost of DFG



VAT and adaptations

B1.9 The Assembly’s Housing Renewal Circular Guidance 20/02 sets out certain adaptation works that are zero rated for VAT purposes. In summary, these are:

- Ramps, widening of doorways and passages, and associated works, which enable the disabled person to enter and access any parts of their property
- Lift installation, and associated works, to allow access between floors
- Providing, extending or adapting bathrooms and WCs, and any works essential to the provision of these facilities.

B1.10 Local authorities did not raise this as a problem through the consultation process. However, in the Assembly Social Justice and Regeneration Committee report **Housing for Older People, 2004**, it was recommended that representations be made to the UK government on setting the VAT rate for all works to meet the needs of disabled people at the lowest possible level. In light of the existing VAT rules, this recommendation could be narrowed to lobbying the UK government to broaden the existing VAT exemptions so that works that could currently be interpreted as not being eligible for zero rating could be included. For example, the provision by

extension or internal alterations of accessible sleeping, living or working accommodation provided for a disabled person is not currently specifically VAT exempt, and clarification that such works are VAT exempt should be sought.

FUNDING- CONCLUSIONS

- 1) DFG budgets are funded from un-hypothecated general fund allocations to local authorities. It is for local authorities to determine how they use the un-hypothecated budget in line with local priorities. Funding for mandatory DFGs are commonly a priority and receive adequate funding from local authority general capital funds. However, in practice this is often at the expense of other private sector housing budgets for repair, renovation and strategic schemes that often help fast track low costing repairs and adaptations and would otherwise assist with the problem of waiting times for DFGs and adaptations in Wales.
- 2) Funding for DFG and adaptations in Wales is almost entirely met through Housing budgets. Funding allocated by local authorities to DFG and adaptations increased by 8% over the 4 years 2001-2004 (after taking inflation into account). Despite this, there continue to be long delays, and clients perceptions are that this is often because funding runs out at the end of a financial year.
- 3) There is concern that budgets allocated by local authorities for DFG from their general allocations will not meet the projected increase demand for DFG / adaptations, as a result of the ageing population in Wales. There is a case for increasing the housing formula driven part of the general capital allocation to reflect the actual increased demand for DFGs in future years.
- 4) Adaptations for RSL tenants are funded through a mixture of PAG from the RSL Social Housing Grant Programme and DFG from local authority general capital funding
- 5) MRA cannot currently be used to fund council tenants DFGs, although the rationale for this is unclear given that suitable adaptations for tenants are a part of the Welsh Housing Quality Standard. This rule puts added pressure on DFG general fund budgets.
- 6) The funding (and legislative) route for smaller DFGs is the same as for high cost, complex DFGs. DFGs of less than £5000 accounts for 58% of the DFG programme. DFGs costing less than £3000 accounts for 28% of the total programme.
- 7) Rules on VAT exempt adaptation works are currently too narrow and exclude certain key types of adaptations

FUNDING- RECOMMENDATIONS

- 1) The mandatory nature of DFG and the need to properly resource the DFG programme should be reinforced to all local authorities.
- 2) The calculation of the housing formula for the un-hypothecated general capital allocation should be reviewed to ensure that it reflects actual demand for DFGs.
- 3) The funding allocation as a result of the housing formula should keep pace with the anticipated increase in demand for DFGs in future years
- 4) To compliment the recommendation (in Part A- Legislation, above) to have a separate route for fast track adaptations costing less than £3000 outside the DFG system, the source of financing this should be carefully investigated. This should include the applicability and appropriateness of using finance arising from the Wanless report, given the clear linkage between fast track minor cost adaptations, promoting independence and allowing persons to remain living in their own homes.
- 5) Major Repairs Allowance should be useable for Disabled Facilities Grants for council tenants. Local authorities should be informed of this change for the next financial year (2005/6).
- 6) That the UK government be lobbied for wider exemptions for zero rating of VAT for adaptation works.

PART C WAITING TIMES AND DELAYS

C1.1 A key aim of the review was to consider how long it took for a client to receive a DFG, from the time they first approached the local authority to the time work was actually completed.

C1.2 The DFG process is complex. There are 4 key stages:

- Time taken for assessment of need by the Welfare Authority (in practice by Social Services Occupational Therapy Team) (“Social Services Time”)
- Time taken from receiving an assessment, to receiving a visit from a Housing surveyor and being formally invited to make an application for DFG, and after submitting the application, the time taken for the grant to be approved (“Housing Time”)
- Time taken to submit a valid application for a DFG (“Client time”)
- Time taken to complete building works after receiving grant approval (“Builder Time”)

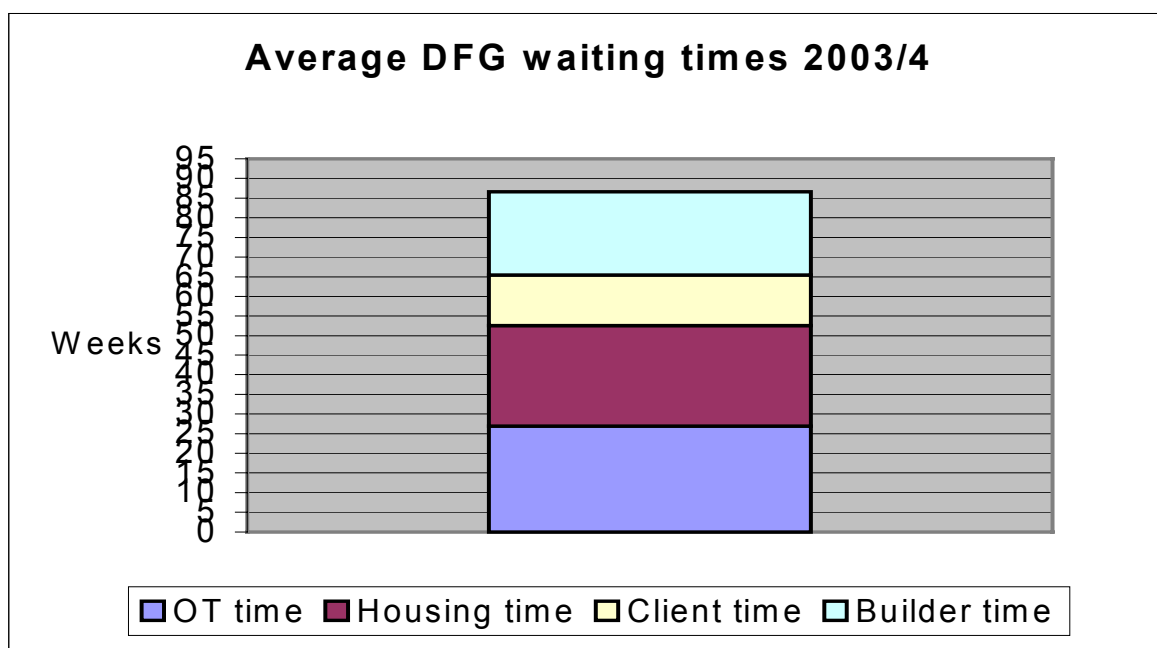
C1.3 Although part of the process is described as client time and builders time, in reality these can also be affected by the type and quality of service made available by the local authority. For example:

- helping clients complete the complicated application paperwork and forms using specialist staff who carry out home visits
- helping clients employ a builder and supervise work through technical Grant Agency services from staff employed directly by the authority
- referring or making arrangements for application forms to be completed, and work to be organised and supervised by the local Care and Repair Agency
- providing information about private agents who can help organise applications, builders and supervision of work
- the provision of comprehensive information about the DFG and adaptation service, processes involved and who to contact
- Setting internal targets to ensure that if application forms were not received by a set time, then follow up contact with the applicant would be made

C1.4 Information has been provided by all local authorities on the key stages of the waiting time for DFG. The average waiting time for a DFG across Wales during 2003/4 is shown in the following table. **Clearly, these time-scales are too long.**

Stage of process	Average time in weeks
First enquiry to OT assessment/ OT recommendations	27
Housing survey, invitation to apply and grant approval after application made	26
Time taken by client to submit application	12
Building works, to completion	20
TOTAL AVERAGE TIME	85 Weeks

Graph 3 Waiting times for DFG 2003/2004



Causes of delays

Assessment (Occupational Therapy) waiting times

C1.5 The above times are averages, and reflect the majority of DFGs completed in 2003/2004. It was found that every local authority has a system in place for carrying out quicker visits and OT assessments for high priority cases. Also, around half of authorities have systems to enable fast tracking highest priority cases through the DFG application process once the OT assessment has been made. However, there is no uniform approach to defining which cases are high priority for OT assessment or grant applications. Authorities have developed local protocols and definitions about this. The target time for carrying out high priority assessments was usually between 1 day and 2 weeks, although one authority 's target was 3 weeks and another's was 12 weeks.

C1.6 Although the average OT waiting time was 27 weeks, and every authority carried out high priority assessments quicker than this, there was also a wide variation on the average time. The quickest authorities took just 5 weeks on average for an OT assessment, while the slowest took 105 weeks (2 years). The review highlighted that the problem of OT waiting time has been addressed by around a quarter of authorities in the past 2-3 years, with significant progress being made. Success was usually brought about by combinations of:

- Recruitment and retention incentives, particularly around ensuring parity of pay with OTs employed by Health Trusts in the same area, and clear career structure
- In house training of non qualified staff- both in terms of day release for OT qualification courses and training non OT qualified staff to undertake assessments for less complex adaptations
- More extensive use of non qualified staff in need assessment, and progress chasing of cases
- Improved joint working with Health OTs, and developing clear protocols for allowing Health OTs to make recommendations for adaptations
- Use of Agency and private OTs
- Improved administrative procedures to enable the backlog to be “project managed”
- Improved and more rigorous approach to performance management
- Limited use of self assessment to allow quicker sign-posting for lower cost, minor adaptations
- Clear focus and time-scale for reducing waiting times, most effectively where this was driven by senior managers and Members
- The setting up of “one stop shops”, or single teams comprising Housing and Occupational Therapist staff or the placement of an OT/ OTs in to housing adaptations teams, resulting in more efficient operations.

Housing waiting times

C1.7 The average time taken for Housing was 26 weeks. Again, there were wide variations on this. The quickest authority took just 4 weeks for the Housing parts of the process, while the slowest took 74 weeks.

C1.8 Analysis of the information suggests that the longest Housing waiting times were in those authorities who had made significant reductions in the waiting time for OT assessments. In other words, as the number of OT visits and referrals to Housing for DFG increased in these authorities, there was either no increase in Housing surveyor staffing levels to resource this or insufficient capital resources, or a combination of both. In spite of authorities indicating good joint working arrangements between Social Services and Housing, this suggests that at the strategic level of planning services and resources, these links did not work well.

C1.9 Similarly, the shortest Housing waiting times were generally seen in those authorities with the longest OT time. In these authorities, there was no pressure on Housing surveyor visits as the number of referrals from OTs were low.

C1.10 The parts of the process attributable to Housing and the average time taken across Wales are:

Process	Average time
Survey of the property	14 weeks
Prepare Scheme and send out invitation to apply	3 weeks
Approval of grant (including means test)	6 weeks

This indicates that the biggest factor in delays from Housing is with time taken to survey the property. This could be due to a number of factors including:

- capacity and number of surveyors employed for this function
- productivity and performance management
- whether surveying teams are specialist in adaptations or part of a generic team- specialist sections tend to be more productive due to better focus on performance and expertise of individuals

Client time

C1.11 The average amount of time that clients took to return necessary paperwork to make a valid application was 13 weeks. The quickest average time was 1 week, and the longest average time was 27 weeks This time includes the completion of application forms and certificates of ownership, proving ownership of the property and getting builders quotes, normally at least 2, to accompany the application. The variation of time taken by clients demonstrates that there is scope to influence the speed of return of paperwork. This could be by providing practical help with completing forms either directly by the local authority or through the local Care and Repair Agency, speeding up proof of ownership processes through IT links to the Land Registry, or providing comprehensive Grant Agency services, either through the local Care and Repair, in house by the local authority or by operation of approved lists of architects/ Agents.

Builder time

C1.12 The average time taken to get building works done was 21 weeks. Once again, there was a large range of average times. In the quickest authority, the average time taken for the building process was 6 weeks, while in the slowest authority, the average time taken was 42 weeks.

C1.13 A few authorities raised the issue of the current buoyancy of the local construction industry, leading to a local shortage of contractors. This was mentioned particularly in rural authorities. The types of response to this problem, where addressed at all included updating schedules of rates for grant work to reflect market prices, and consideration to promoting grant work with builders and setting up approved or accredited lists of builders for this type of work.

Lower cost/minor DFGs

C1.14 The average time taken to provide DFGs includes low cost, relatively straightforward and repetitive type adaptations (eg straight track stair-lifts, level access showers) as well as higher costing, complex adaptations such as extensions, through floor lifts or major internal alterations costing up to £30,000. The review has demonstrated that around 28% of DFGs cost less than £3000, and 58% of DFGs cost under £5000. As stated in Section 4 parts A and B (Legislation and Funding), it is at least questionable whether these lower costing DFGs need to follow the same route as other more complex DFGs, and whether a less bureaucratic route in terms of OT assessment and the grant application process would be more desirable. Part H provides more details on the provision of minor adaptation services.

Profile of DFG services and managing performance

C1.15 Authorities were asked about the profile and priority of DFG and adaptations services. No authority had local performance indicators for measuring the time taken to provide DFGs or adaptations, that were reported at a senior manager or member level. There was no focus on the whole of the process (ie inclusive of Social Services, Housing, client and builder time), and even in those authorities that had started to look at issues such as OT waiting time, this was not followed through to later stages of the process.

C1.16 One of the questions asked during interviews with local authorities was about how the issue of the whole process and profile of DFG and adaptations could be addressed. Every local authority agreed that a National Assembly statutory performance indicator was desirable. There are compelling reasons for introducing a national PI in this area:

- (a) The programme is already spending large amounts of capital resources (nearly £50million annually)
- (b) Projections for large demographic growth in the number of older persons will further increase demand in the size of this programme in future years
- (c) DFG is the only remaining mandatory housing grant, and the only private sector housing service where there is commonality between all local authorities in terms of a specific capital programme to deliver

- (d) The DFG programme delivers significant outcomes in terms of helping people to remain living independently in their own homes, decreasing the need for residential care, decreasing the number of older person hospital admissions and helping with the agenda of speeding up hospital discharge
- (e) National Performance Indicators are used by local authorities as health checks against key performance objectives. Including DFGs and adaptations as a national PI will help increase the profile and priority of this work at a local level.

DELAYS- CONCLUSIONS

- 1) Although many local authorities have systems for prioritising cases for assessment and receiving adaptations, and certain cases are fast tracked, the average waiting time for DFGs is unacceptably long.
- 2) Average waiting times are the same irrespective of the scale or complexity of the DFG.
- 3) There is a wide variation in practice and systems used across Wales. For all parts of the process, the information collected during this review suggests that:
 - the ability to deal with waiting time issues is within the powers of local authorities ,and
 - the best local authorities have solved many of the individual issues related to delivering a good overall service, e.g. one stop shop or single adaptation teams, tackling OT backlogs, fast tracking smaller works, speeding up different parts of the grant application process, helping clients return forms.

None however have solved all issues. The sharing of good practice across all authorities would lead to improvements to processes across the board

- 4) Even though DFGs are mandatory and DFGs and adaptations contribute significantly to national and local policy objectives, the profile of the service is not high in terms of local authority corporate performance indicators.
- 5) There are no current Assembly performance indicators for the delivery of DFG and adaptation services.

DELAYS- RECOMMENDATIONS

1. The detailed comparative and benchmarking work undertaken under this review should be prepared as a separate report and issued to local authorities and RSLs in order to encourage the sharing of performance information and best practice in DFGs and adaptation services. (eg C1.6 above sets out good practice in relation to reducing OT waiting times, and detailing this for all local authorities will help share this across Wales)
2. A series of seminars presenting the outcomes of:
 - the Wales DFG review
 - the Phase 2 WLGA benchmarking and good practice report (when completed)
 - ODPMs “Delivering Adaptations, a Good Practice Guide” ;should be organised in partnership with organisations such as CIH Cymru, CIEH Cymru, WFHA and Care and Repair Cymru.
3. As also recommended in Section 4 Parts A and B, a more streamlined way of providing lower cost DFGs (those costing under £3000, accounting for 28% of all DFGs) should be investigated. This should aim to be less bureaucratic in terms of processes for the assessment, application and organisation of work.
4. To properly reflect the importance of this growing area of work, a statutory PI should be introduced that sets a target and measures the process of undertaken DFG and adaptations in all tenures, from the first point of contacting the local authority to the completion of work.

PART D THE MEANS TEST FOR DISABLED CHILDREN

- D1.1 The review set out to examine the test of resources (means test) particularly as it relates to disabled children. In all situations, other than for dependent children (usually all those aged under 18), the means test is carried out on the disabled person applying for grant. In the case of disabled children, the means test is undertaken on the parents of the children.
- D1.2 In every interview and questionnaire returned, whether it was from local authority officers, RSL officers, clients or advocacy groups, there was universal agreement that the means test for children did not work well.
- D1.3 The Literature Review in Section 3 outlines various works and research carried out in recent years. These works conclude that the means test for children cases is problematic, and set out the reasons why.
- D1.4 A paper by a coalition of charities was submitted to the Office of the Deputy Prime Minister DFG review group in England (of which the Assembly is an official observer). The contents of the paper apply equally in Wales. The coalition comprised ASBAH, Barnados, Child Brain Injury Trust, Children's society, Council for Disabled Children, Contact a Family, Down's Syndrome Association, Mencap, Muscular Dystrophy Campaign, NCH and Scope. Some extracts from the paper, expressing the views of the coalition, are as follows:

"The Disabled Facilities Grant (DFG) is currently failing many families with disabled children. Too many families are being put in impossible financial positions when trying to make vital adaptations to their homes, and their children are suffering as a result. We welcome the Government's review of the DFG process, and urge the review group to listen to the many parents with disabled children who have come to us with their experiences"

".... problems with the current DFG process:

1. The DFG is not accurately assessing even the poorest family's ability to contribute towards expensive housing adaptations. The current process has left a family with an annual income of just £14,000 being told that they need to contribute £10,000 to pay for an adaptation.
2. The process is too drawn out and prone to delay, and families can be left waiting for years for vital work to be done. A growing child becomes harder and harder to carry and parents are at risk from injury to themselves or the child.

"For a disabled child, an accessible home can have many direct benefits which will also have direct savings for the state:

- an improved sense of self-confidence and independence;
- reduction of possible safety risks and avoidable expensive health complications;
- known associated benefits of good housing eg better educational achievement;
- being able to stay in the family home and not having to be placed in a residential home"

“For parents and siblings, a home that is accessible for the whole family:

- alleviates the need for continued lifting, and reduces possible long-term medical problems;
- may improve employment options due to the reduced need for full time care or by improving prospects of obtaining childcare;
- can relieve some of the stresses of constant supervision;
- relieves the prospect of being forced to consider putting their child into residential care.

By allowing people to live in good quality and suitable homes, the Government will make long term savings in health, care services, and other forms of state intervention, as well as improving the life chances of disabled children and their families.”

“All families bringing up a disabled child face much tighter financial constraints than those caring for a non-disabled child:

- Bringing up a disabled child costs three times as much on average as a non-disabled child.
- Families face reductions in employment status, level of earnings, savings, and pensions.
- There is the additional cost of equipment, transport requirements, and medical support that will put extra financial pressures on the family, often without any assistance.”

“Research has shown that among the families who had been assessed as needing to make a contribution to the costs of an adaptation, at least one third had been unable to meet these costs and the adaptation had not been carried out. Many of the other families take out substantial loans, undertake personal fundraising, or make compromises on the level or quality of work that they opt for. This is in addition to the many families who are put off from applying for a DFG altogether”

D1.5 Two recent reports by the charities Contact a Family and Family Fund set out the increased financial burdens and levels of debt faced by families of disabled children. The first report, **“How Do They Manage?”** outlines patterns of income and expenditure amongst families with severely disabled or seriously ill children. This research was carried out between November 2003 and February 2004. The findings are based on an analysis of questionnaires completed by 98 families from the Family Fund database. The second report, **“Debt and Disability”** is based on a questionnaire survey of 1007 families from the Family Fund’s database and 836 families visiting the Contact a Family web site and completing the survey on line. This research was carried out between May and June 2004.

The headline findings of the reports in relation to families with disabled children are:

- Average family incomes are £15,270 per year, 23.5% less than the UK average of £19,968 per year
- Higher than average expenditure of £21,980 per year compared with the UK average of £19,970 per year
- The gap between income and expenditure is therefore £6,710 per year. This is quoted as being due to additional costs for children with disability- food, clothing, transport, housing cost etc
- 14% of families reported having mortgage or rent arrears
- Credit is used to fill the gap. This was the area where there was the most difference between the research families and the UK families generally. The average spend by UK families on loan repayments is £3.10 per week as opposed to £27.61 per week by families in this research

The reports recommend many measures to help tackle the relatively higher levels of poverty experienced by families with disabled children. Among these is the recommendation to abolish the means test for disabled children:

“The means test for DFG is assessed on the parents ability to borrow money. Many parents of disabled children cannot afford to borrow money. If they are employed, they may feel concerned that they will have to reduce their hours at any moment, or give up work, if their child becomes seriously ill. Some refuse a grant because they cannot afford to raise their contribution. Children’s needs therefore go unmet”

D1.6 In relation to the direct research undertaken through this review, the particular problems with the means test as identified by users, advocate groups, local authorities and RSLs, throughout the consultation process are:

- It does not adequately take into account the actual cost of paying mortgages and rents. In cases where the means test is carried out on younger families with children, who often are just starting on the property ladder and have significant mortgage cost, this is seen as particularly problematic
- It is a disincentive for parents to work
- It does not take into account the additional costs of caring for a disabled child. For example, travel costs associated with frequent hospital visits, costs of replacing carpets where there is a great deal of wear (by health and social care worker visits), and purchase of specialist items were specific costs outlined by the parent of a disabled child during a visit undertaken as part of this review.
- The means test can be carried out on the parents of the child one week, and there could be a significant contribution to pay, whilst the following week after the child reaches the age of 18 and the child is then means tested, there is a nil contribution

- Where a contribution is required, there is evidence either of families taking out loans which are high interest rate and ultimately not affordable and lead to long term debt, or where the cost of adapting the home for the disabled child leads to sacrifices in terms of what is available to spend on brothers and sisters who are not disabled, family holidays or non luxury essentials such as repairing and maintaining the house.
- Conversely sometimes the adaptations do not get carried out, in which case parents resort to physically carrying the child around the home including to upstairs bedroom and bathroom facilities.
- Some cases were cited where the adaptation does not go ahead due to the means test, leading to a need for the child to be cared for in a residential home, at costs of between £50,000 and £100,000 per year. In such cases, purely on economic grounds for a local authority's budget as a whole, it would be more cost effective to have provided the full cost of adaptations.
- Where local authorities finance major adaptations for council tenants from their housing revenue accounts, there is no means test for children cases. In authorities that use DFG for major adaptations for tenants, the means test is applied. The funding of adaptations in Council houses varies widely across Wales, leading to inequity from area to area in relation to whether families are asked to contribute to costs or not
- The way in which Social Services in different local authorities deal with their obligations under the Children's Act and the Chronically Sick and Disabled Persons Act varies across Wales. In some areas, Social Services may undertake a secondary means test, or provide loans, whereas in others this isn't the case. Similarly, different authorities have introduced different systems for dealing with children adaptation means test under their RRO powers. For example, one authority does not means test, one provides interest free loans, and one has amended the means test locally with the effect of halving the contribution. There is therefore a picture of inconsistency across Wales in relation to the means testing of children adaptations

D1.7 Local Authorities were asked whether they thought that the means test was unfair and 100% responded that they thought it was unfair. 7 out of 22 thought the mean test should be abolished, 10 out of 22 thought it should be amended and 5 out of 22 had mixed views. Those authorities who preferred to see the means test amended to better reflect out-goings were concerned that wealthy families with disabled children would enter the system. Those who preferred to see abolition did not feel that wealthy persons would benefit, claiming that the waiting time for the OT assessment and the rest of the process would be a deterrent to this. Another often stated view, particularly by voluntary and advocacy groups was that amending the test, which is very complicated in its operation, brought the danger of adversely affecting certain individual cases- the way in which the test operates can vary depending on individual circumstances.

- D1.8 In 2004, the National Assembly's prepared and issued for consultation its ***“National Service Framework for Children, Young People and Maternity Services in Wales”*** The NSF contains 7 core aims. Amongst these are to ensure that all children *“ have a safe home and community which supports physical and emotional well being”* and that children *“are not disadvantaged by poverty”*. More specifically in relation to disabled children and young people, Chapter 5 of the Children's NSF identifies that *“ disabled children and their families face many social and physical barriers to full participation in society. It is not only disabled children's impairment which determines their quality of life, but also negative attitudes and a disabling environment, for example.....housing....”*. It also identifies that *“Parents of disabled childrennot only suffer extra financial burdens but also endure an emotional cost”*.
- D1.9 To ensure that services to disabled children are delivered in the ways set out in the Children NSF document- equitably, with no social exclusion and no inequality of opportunity, having regard to the evidence in this chapter, it is clear that the current means testing system needs to be replaced.
- D1.10 On the question of whether the means test should be abolished or amended, views from voluntary and advocacy groups tended to support abolition- for the reasons given in above paragraphs, but also on the basis that this was a disability rights and children rights issue, and that a suitably adapted home environment should be a matter of right.

The cost of children DFGs

- D1.11 Local Authorities were asked to provide information about the number of children DFG cases in 2003/2004. They were asked to provide details of:
- The number of DFGs approved
 - The average cost of DFGs approved
 - The average means tested contribution of DFGs approved
 - The number of DFGs not approved due to drop out resulting from a unaffordable contribution
 - The average means tested contribution for cases not approved.
- D1.12 21 authorities out of 22 provided information, although not all of these were able to provide the full range of information asked for. The following table shows the results of the questions above. Where authorities have not provided information, results have been extrapolated based on averages so that an estimate across 22 authorities can be made. The results are as follows. The figures represent an informed estimate of the annual demand and costs of dependent children DFGs:

Number of DFGs approved	162
Average value of approved DFGs	£17,872
Average means tested contribution of approved DFGs	£1,319
Number of DFGs not approved due to too high a contribution	37
Average means tested contribution of cases not approved	£15,656

Using this data, it is possible to estimate the annual cost across Wales of abolishing the means test. This would be:

- a) *The number of cases approved times the average contribution*
 $162 \times £1319 = £221,023$
- b) *The number of cases not approved times the average total cost of works*
 $37 \times £19191 = £710,067$

Total = £931,090

D1.13 In addition however, there will also be an unknown increased demand resulting from abolishing the means test. This would comprise the people entering the system, who have previously dropped as a result of having contributions they did not feel they could afford, and people who may not have thought about entering the system because of the means test. Some of this will be a recurring annual amount, and some will be a short term increase that would even out after the initial 2-3 years. The estimated additional cost, which would in effect be spread over 2-3 years would be around £2 million

D1.14 Broader statistical analysis has also been undertaken based on of the number of disabled children in Wales, likely rates of application for DFG based on previous data, and types and cost of adaptations likely to be required. It has been estimated from this that

- means tested contributions of approximately £150,000 per year are collected from parents of disabled children, where the grant goes ahead. This is less than the estimate from the above exercise (D1.10-£221,000 per year) but nevertheless a comparable figure.
- An annual increased demand of up to 200 cases per year, at an additional cost of £2million per year. This is significantly more than the estimate from the above exercise (£710,000 per year)

D1.15 The Northern Ireland Executive made a decision to abolish the means test for children DFGs in December 2003. This was implemented in February 2004. The Northern Ireland Executive were consulted in November 2004

about the effects on demand of abolishing the means test for children. At this time, their experience was:

- that the number of approvals between April and October 2004, was the same as the corresponding period April-October 2003.
- There was some anecdotal evidence that occupational therapists were directing families, who had previously been means tested and not received grant, back into the system.

A note of caution here however is that children adaptations tend to be more major, and expensive work, and this may take up to 18 months after the date of abolition to show as approvals or expenditure in the system.

D1.16 Using a combination of the specific 2003/4 data collected from authorities and the general statistical analysis, the estimated additional recurring annual cost of abolishing the means test in Wales would be around £1.5 million per year. The short term increase in demand would lead to “one off” additional expenditure of around £2-3 million spread over 2-3 years.

D1.17 As well as the specific issue of the means test for disabled children, the DFG means test provisions generally are being reviewed by the ODPM DFG review steering group in England. The Welsh DFG reviewer and Assembly officials attend this meeting, and are in contact with the research team undertaking the review in England. When the wider review of DFG means testing has been completed, it will be considered in relation to Wales and a further report will be prepared.

CONCLUSIONS

1. The current means test does not work for children DFG cases, for a number of reasons, as highlighted by researchers, charity and advocate groups and recognised by service providers and service users alike.
2. The cost of abolishing the means test for children is estimated at £1-1.5m per year (annual recurring cost) plus an estimated one off additional cost of £2-3m over the first 2-3 years of abolishing the means test.
3. The wider means test, including for younger disabled people, is being reviewed as part of the ODPM DFG review in England. The outcome of this will be considered by the Welsh review at a later date.

RECOMMENDATIONS

1. The means test for dependent children DFGs should be abolished
2. Finance to cover the additional cost should be met by the Assembly by increasing local authorities un-hypothecated general capital fund allocations to reflect the actual cost of abolishing the means test for disabled children cases
3. The conclusions of the wider review of DFG means testing being undertaken by ODPM in England should be considered in Wales when complete.

PART E COUNCIL TENANT ADAPTATIONS

E1.1 Council tenants are eligible to receive mandatory DFG on the same terms as owner occupiers, RSL tenants and private tenants. In practice, council tenant adaptations are funded in a variety of ways. In relation to Council tenants, the review sought to identify:

- How adaptations were funded
- Service standards compared to other tenures
- How effective local authorities were in allocating properties that had already been adapted, to tenants (or owners) in need of an adapted property, when a suitable adapted property became available

E1.2 The questions of funding routes, processes for tenants, and adapted property allocation practices were investigated through the questionnaires, visits and interviews with all 22 local authorities. The question about ‘recycling’ adapted properties to those in need was also more widely posed to voluntary and advocacy agencies and RSLs, as well as local authorities.

Funding routes and processes for Council tenants

E1.3 A wide range of practice and funding avenues was found to exist for Council tenants. For “major” adaptations (costing £5,000 or more), 6 authorities referred their tenants through the DFG system, 7 authorities only used the housing revenue account (HRA), and 9 authorities used both sources of funding.

E1.4 For those authorities who used DFG as the route for major adaptations, there were differences in how these were funded. Of the 15 authorities who used DFG, 9 used General Capital Funding, while 6 used their housing revenue accounts to fund DFGs. Some local authorities reported that the method of funding tenant adaptations could change from year to year, depending on the relative availability of resources in the general fund and housing revenue account. This added to the confusion in terms of how services were delivered for tenants.

E1.5 In addition, there were differences in how local authorities approached the payment of means tested contributions where they processed council tenant DFGs. Of the 14 authorities who processed tenant DFGs, 2 used the housing revenue account to pay the contribution, whilst 12 required tenants to pay contributions themselves.

E1.6 There were operational differences in terms of how adaptations for council tenants are administered. Some authorities had single housing teams who dealt with adaptations in all different tenures. In these areas, there was more likely to be consistency in terms of publicity and information, and the level of

service received and waiting times. Where authorities had separate housing teams for different tenures, there was more likely to be different levels of service and waiting time between the different housing tenures.

- E1.7 The funding of Council tenant DFGs and adaptations is described in Section 4 Part B above, including the level of resources from different funding sources, and the rules on use of Major Repairs Allowance for DFG for council tenants.

Adapted Property Registers and matching clients in need to suitably adapted properties

- F1.8 The provision of adapted property registers is covered in Part G below.

Minor adaptations

- F1.9 The provision of minor adaptations in all tenures is covered in Part H below.

Transfer of council housing stock

- F1.10 Local authorities are required to meet the Welsh Housing Quality Standard by 2012. Each local authority is developing a business plan setting out the costs for achieving this standard, and how that standard will be met. One of the options available is to develop arms length organisations to transfer the housing stock to. The decision on this would be through ballot of tenants. If transfer to an arms length organisation is carried out, it frees up that organisation's ability to borrow privately to help pay for necessary works.

- F1.11 This issue has a potential significant impact on future DFG budgets, if the assumption made is that local authority DFG budgets will pay for tenant DFGs and adaptations when the stock has been transferred

- F1.12 Therefore, in the context of this review, local authorities were asked whether they had considered the issue of funding adaptations in their business plans, or including clauses on adaptations in their transfer agreements. The following feedback was received:

- 3 authorities assumed that general funded DFG would continue to pay for major costing tenant adaptations, with the transfer authority funding more minor costing adaptations, in line with the historic amounts spent from the housing revenue account on minor adaptations.
- 1 authority stated that no costs at all would be factored in, making the assumption that local authority Social Services and DFG budgets would cover the entire cost of adaptations to transferred stock
- 1 authority stated that the full cost of DFG and adaptations is being built into their business plan

- 2 authorities felt that this would not become an issue as transfer was unlikely
- 1 authority had major concerns that stock transfer would increase the burden on general funded DFG budgets significantly
- 11 authorities expressed no view, or were unsure about how provision of adaptations within business plans.

F1.13 In general terms, the response of local authorities to how to treat the cost of adaptations within business plans or transfer agreements was unclear, and the issue lacked profile.

CONCLUSIONS

1. There is a wide range of practice amongst local authorities on how major and minor cost adaptations are delivered to their tenants. In general terms, this means that the level of services received by tenants in different areas varies widely. It also means that differences in services received and service standards varies between different housing tenures in the same area.
2. There are some examples of good practice in delivering adaptation services in many areas, which could be shared using appropriate dissemination routes.
3. The way in which major and minor adaptations for tenants should be funded if local authorities transfer their stock is unclear, and local authorities are taking different views and approaches to this.
4. Stock transfer may have a potential significant impact on future DFG budgets.

RECOMMENDATIONS

1. A framework should be set in place that requires a greater level of uniformity for the delivery of council tenant adaptations. This should include:
 - Clear definition of what are considered minor adaptations (those costing less than £1000), and a common unbureaucratic route for delivering these, outside of the DFG system
 - Requirement that council tenant major adaptations are delivered to the same time-scales as DFG (or better) through inclusion of these in the NAWPI framework.
2. That good practice in delivering adaptation services for tenants be shared through the dissemination routes described in recommendations to Part C
3. That a clear policy lead and guidance is given to local authorities that requires them to build into business plans and transfer agreements all major and minor adaptation costs for bringing their stock up to the WHQS.

PART F ADAPTATIONS FOR REGISTERED SOCIAL LANDLORD TENANTS

- F1.1 The review investigated the way in which DFG and adaptations are currently provided for RSL tenants, and the views of RSLs, local authorities and user groups about problems with the existing arrangements and how this could be improved.
- F1.2 Under the current legislation, DFGs are available for RSL tenants in exactly the same way as owner occupiers, private tenants and council tenants. In practice, funding for this is from local authorities private sector renewal/DFG budgets. However, there is also Social Housing Grant (SHG) funding held by the Assembly for RSLs to access for adaptations for tenants in their own properties. This funding is called Physical Adaptations Grant (PAG), and is commonly referred to as "Scheme 1A". Also, RSLs are able to use their own resources and do so in many cases (but not all) to fund lower cost minor adaptations.
- F1.3 Information was collected from RSLs using questionnaires and visits and interviews. Questionnaires were sent to the 28 largest RSLs in Wales. 21 were returned, a return rate of 75%. 6 RSLs were visited and the delivery of adaptations and views about DFG were discussed. Information collated from the visits and questionnaires are summarised as follows:

Funding of RSL adaptations

- F1.4 In 2003/4, the amount of funding drawn down from PAG was around £850,000, whilst DFGs estimated at £1.8m were completed. This gives an average annual cost of around £2.65m for adaptations for RSL tenants

Funding approaches to RSL adaptations/DFG

- F1.5 The approaches in terms of funding and practice varied considerably. It is clear that the existence of PAG and DFG leads to inconsistency in approach between different geographical areas. For example, some local authorities do not process RSL tenant DFGs, but refer RSLs in their area through the PAG route. Some RSLs only use PAG and do not access the DFG route. Some RSLs have not heard of PAG and refer all enquiries through DFG. Some use a mixture of both.
- 10% of RSLs had never used PAG funding, and in fact did not know it existed.
 - No RSL funded all adaptations from their own resources without recourse to PAG or DFG
 - 29% of RSLs only referred tenants for DFG
 - 57% of RSLs used a mixture of DFG and PAG

- 71% used their own resources for some minor costing adaptations. 29% did not use their own funds for any minor adaptations

These different practices and funding routes lead to inconsistency for RSL tenants in terms of means testing (DFG is means tested, PAG is not) and service standards.

- F1.6 There was a generally held view that a single funding route and process for RSL tenants is needed. 76% of responding RSLs felt that Social Housing Grant (PAG) was a satisfactory route and preferred this to DFG. No RSLs stated that they preferred DFG as the funding route. 24% did not state a preference. Support for PAG as the sole funding route was also high amongst local authorities, with 82% of L.A.s indicating their preference for this.
- F1.7 RSL understanding of the PAG process was mixed. 53% showed a good or fair understanding of the process when asked this question within the questionnaire. 34% showed a patchy or poor understanding. 14% did not answer this question. It is clear that although some RSLs are fully aware of and use PAG, collectively they are not aware of the rules for PAG in terms of;
- minimum/maximum costs
 - eligibility criteria for the tenant and work allowed (there is confusion about whether a minimum length of tenancy is required before the RSL becomes eligible to apply)
 - What is required in terms of paperwork, OT support, builders quotes.
- F1.8 Those RSLs who used PAG thought that the processes were generally quicker than for DFG. Nearly 20% reported that they had set up arrangements with Social Services locally for using private OT reports to accompany PAG applications, with quality checks by Social Services, in order to reduce referrals to Social Services and speed up the adaptation process for their tenants. A further 14% were considering this course of action.
- F1.9 There was a specific suggestion made by 3 RSLs to speed up the PAG approval process. A retrospective claim process was suggested, subject to checks and balances against scheme criteria, to enable works to be undertaken quicker, particularly where getting builder quotes was a problem. 2 RSLs suggested a schedules of rates for PAG, which would help with consistency of pricing works and would help facilitate retrospective claims in that so long as the client and the works were eligible, the cost would be pre determined.

RSL internal practices

F1.10 RSLs were asked about their internal procedures and practices in relation to adaptations for their tenants. The following responses were received:

- 8 from 21 (38%) provided information, publicity or literature about adaptations for tenants
- 10 from 21 (48%) visited clients who requested adaptations to discuss their options
- 7 from 21(33%) had a minor adaptations / handy-person service
- 13 from 21 (62%) referred all cases for DFG
- 18 from 21 (86%) considered re-housing as an option

F1.11 In relation to problems with the DFG system generally, RSL views were much the same as users, user groups and indeed local authorities:

- 62% felt that OT assessment times specifically were too long
- 33% thought that lower costing adaptations should not necessarily need an OT assessment
- Many thought that the process as a whole was too long
- There was confusion about who was responsible for maintenance of equipment provided through DFG (as legally , when DFG is awarded, the tenant owns the adaptation)
- 20% thought that communication from L.A.s on individual cases was poor and felt dis-empowered where the DFG route was used

Adapted Property Registers

F1.12 The provision of adapted property registers is covered in Part H of this Review.

CONCLUSIONS

1. The estimated value of major adaptations (PAG and DFG) undertaken annually is £2.5m- £3m
2. The existence of 2 funding routes for major adaptations leads to inconsistency and confusion about how major adaptations are provided for RSL tenants. There needs to be a single funding route.
3. Practice amongst RSLs in funding minor adaptations varies, again leading to inconsistent services for tenants. Around 75% fund some minor cost adaptations, the remainder do not. The thresholds for what are deemed minor adaptations also vary.
4. The PAG scheme is not consistently known or understood by RSLs or local authorities.
5. Where PAG is used, it can be accessed quicker if RSLs provide private OT reports. This also has the benefit of reducing referrals to the under pressure Social Services OT services.
6. In certain cases, the PAG system itself is too slow, and could be speeded up by streamlined processes such as retrospective claims, and the operation of a central schedule of rates.
7. In line with other tenures, the availability of clear information and publicity about available services is unsatisfactory.

RECOMMENDATIONS

1. All RSL major cost adaptations should be undertaken using Social Housing Grant (PAG) funding.
2. Minor adaptations costing less than £1000 should be the responsibility of the RSL, and not eligible for PAG or DFG.
3. The PAG scheme should be overhauled and clarified in terms of eligibility, minimum and maximum costs, eligible work, and paperwork required to be submitted. As far as possible PAG should match provision under the DFG system
4. The PAG scheme should be publicised amongst all RSLs
5. To speed up adaptation works, retrospective claims for PAG should be allowable, subject to clear checks and balances to ensure such claims fully comply with PAG requirements
6. Consideration should be given to the operation of a central schedule of rates for PAG works.
7. Information about available routes to adaptations for RSL tenants should be published, as part of the general information/ publicity material proposed elsewhere in this report.

PART G ADAPTED PROPERTY REGISTERS AND ALLOCATION OF ADAPTED SOCIAL HOUSING

G1.1 Social housing providers (RSLs and local authorities) have the opportunity to use suitably adapted properties in their own stock to meet the identified needs of disabled persons applying for their housing, and for persons whose existing properties need to be adapted. It is clearly sensible to have effective systems in place that at a minimum:

- Can identify adapted properties when they become available for letting
- Can identify what adaptations have been undertaken within these properties (an adapted property register / database)
- Ensures that sufficient time and thought is given to how to re-let these properties, rather than remove adaptations quickly in an attempt to let the property quickly to meet void turn around targets
- Explores the option of re-housing with clients as a solution to their identified need, particularly for those cases where adapting the existing property is expensive eg is approaching the maximum amount of grant
- Has allocation policies that enables the fast tracking of re-housing of disabled persons in need to suitable properties when they become available
- Has a clear interface between Social Services OTs, Housing Officers, Allocation Teams and DFG/Adaptation Teams
- It would be desirable that the system incorporated the housing stock, and officers of RSLs as well as local authorities

G1.2 One of the aims of this review was to ascertain to what extent the above processes were (or were not happening), to explore how improvements could be made and to identify and disseminate best practice.

G1.3 Local authorities were asked about whether they had an adapted property register, and systems in place that matched persons in need to suitably adapted properties:

- 8 from 22 authorities (36%) claimed to have an adapted property register. Not all of these authorities used the register as a tool for matching suitable properties to persons needing them
- 8 from 22 authorities (38%) appeared to have a systematic way of matching persons needing adapted housing, to suitably adapted housing when it became available. These were not necessarily the same 8 that had a register. In some cases there was a matching process, but no formal register.
- 5 from 22 authorities (23%) said that they were actively developing registers and matching processes
- Some authorities did describe some good working relationships between social services and housing staff that at least ensured that on an ad hoc basis, there was matching of suitably adapted properties to clients in

need of them. The difference between these and a truly effective system is that the best systems had the ability to consistently identify adapted properties, actively promote and present re-housing as an option, and ensure that all staff were engaged and understood the processes.

G1.4 Only 2 authorities appeared to have developed effective and robust systems that combined a register of properties with effective matching processes. A further 2 authorities were considered to be reasonably advanced in developing a robust system. Some of these systems and schemes had been developed from “Innovation in Social Housing” funding, and some also involved RSLs. The most successful schemes have resulted in significant numbers of persons being re-housed, who might otherwise have required DFG or major adaptations funded by housing revenue account. In one scheme, 80 persons had been re-housed in 2 years, and in another 50 had been re-housed in 3 years, with significant cost savings.

G1.5 14 from 21 RSLs reported having a formal “Register of adapted properties”. As with local authorities, having a register did not always mean that robust systems for matching tenants in need to suitable properties followed. 14 from 21 RSLs described systems for matching tenants in need of adaptations with adapted properties.

CONCLUSIONS

1. Effective adapted property registers for social housing, and matching schemes can lead to significant numbers of persons being satisfactorily re-housed, and substantial costs savings in terms of DFG and Housing Adaptation budgets
2. Some schemes have been developed that effectively record and identify properties that have been adapted and then re-use them when they become available for persons needing adaptations. However, in relation to the number of local authorities and RSLs, the development and use of such schemes is low.
3. Although not systematically undertaken, there is quite widespread practice, through ad hoc and local relationships, to try to let adapted properties to persons needing adaptations.
4. There is evidence in some areas that little thought is given to matching adapted properties to persons needing them

RECOMMENDATIONS

1. Local authorities should be reminded of the desirability of adapted housing register and matching schemes, their benefit in terms of making the most cost effective use of adapted stock, and should be required to set out their plans for such schemes within their local housing strategy and private sector renewal assistance strategy.
2. The best schemes and systems should be commended for replication across Wales. This could be facilitated by the sharing of information collected as part of this review and/or a series of best practice seminars for L.A.s and RSLs, facilitated by the Assembly and organisations such as WFHA and CIH Cymru

PART H MINOR ADAPTATIONS

- H1.1 As well as DFGs and major costing Council/RSL tenant adaptations, the review sought to collect information on how lower costing “minor adaptations” were delivered by local authorities and RSLs for disabled people in all housing tenures. The effectiveness of how minor adaptations are delivered directly impacts DFG and major adaptation services, particularly in relation to how scarce OT resources are used to best effect.
- H1.2 A significant proportion of referrals made for occupational therapist assessment are not for major adaptations, but for relatively small items such as, grab rails, mop-stick hand rails, galvanised hand rails, lever taps, and minor areas of ramping. Many of these are for older people for improved home safety, reduced pain and ease of use of their home or to facilitate discharge from hospital or social care. Such minor adaptations therefore help meet significant policy objectives such as social inclusion, effective hospital discharge, safety at home for older people and community care. **NB for the purposes of this chapter, minor adaptations refers to low cost adaptations, typically costing under £1000, that are delivered directly by Social Services, and by Housing Departments and RSLs for their tenants, rather than through DFG. This differs from previous chapters of this report where the best way of delivering DFGs costing under £3000 has been discussed.**
- H1.3 There is no legal definition for what constitutes a minor adaptation. For the purposes of this report, the term describes those adaptations which would normally be considered as costing too little to be undertaken through a DFG. **Under delayed discharges legislation in England, circular guidance states that responsibility for funding adaptations costing under £1000 falls on local authority social services, and consequently outside the DFG system.**
- H1.4 Amongst Welsh local authorities, the definition of what constitutes a minor adaptation varied significantly. This ranged from “less than £350” to “under £2500”. Typically, minor adaptations were defined as those costing under £750.
- H1.5 For Council tenants, there was a wide range of practice in terms of who funded minor adaptations, and to what extent.
- In 3 authorities, the housing revenue account paid for all minor adaptations
 - In 8 authorities, Social Services paid for all minor adaptations
 - In 9 authorities, a mixture of Social Services and Housing Revenue account paid for minor adaptations

- Levels of funding from Social Services for minor adaptation programmes varied from £5000 to £250,000. A typical Social Services minor adaptation programme was around £50,000 per year.
- H1.6 A few local authorities had developed schemes that specifically targeted improving “safety at home” for older council tenants, and facilitating hospital discharge. Two authorities have specifically developed a scheme for tenants that mirror the Rapid Response Adaptations Programme available for older home owners through Care and Repair.
- H1.7 RSL approaches to minor adaptations also varied significantly. 71% of responding RSLs indicated that they used their own resources for some minor adaptations, whilst 29% indicated that they did not use their own funds at all for this purpose
- H1.8 For owner occupiers, there was a wider range of provision for minor adaptations.
- Every LA are has a RRAP programme delivered through the local Care and Repair Agency, in partnership with Housing, Social Services and Health (see Part I for details of RRAP programme)
 - 18 local authorities provided minor adaptations directly through social services funding (although one of these had a very small programme of £5000 for the year)
 - 7 local authorities provided quicker minor adaptations through its Housing Assistance policies made under the Regulatory Reform Order. Of these, 2 local authorities provided minor adaptations assistance only through its RRO provisions ie there was no funding available from Social Services
- H1.9 Practices on assessments required for minor adaptations varied considerably in all tenures. In many cases, OT Assistants and other Social Services staff such as Health visitors could prescribe minor adaptations. In a few areas, self assessment and technical/surveying staff directly ordering work was used. In some areas there was less flexibility and full OT assessments were required. Clearly, where non complex less expensive adaptations can be undertaken by non OT qualified staff, this will free up OT time to deal with the generally high levels of demand and backlogs for assessment highlighted in Section 3 of this report.

CONCLUSIONS

1. Minor adaptation services are inconsistently defined, funded and delivered across housing tenures and between different parts of Wales.
2. There are examples of good practice in delivering adaptation services in many areas, covering all tenures, which could be shared using appropriate dissemination routes

RECOMMENDATIONS

1. Minor adaptations should be clearly defined. It is suggested that the definition should relate to cost, and that all adaptations costing under £1000 be classed as minor.
2. The delivery of minor adaptations (under £1000) through less bureaucratic mechanisms than DFG should be promoted.
3. The funding of minor adaptations costing £1000 or less should be made the responsibility of Social Services for owner occupiers and private tenants, RSLs for RSL tenants, and Housing Departments for Council House tenants. The mechanism for achieving this should be investigated including:
 - Investigating whether existing Assembly powers/secondary legislation could be used
 - Introducing within Social Care legislation for Wales
 - Lobbying for introduction in new UK legislation
4. The use of non OT qualified staff and self assessment should be encouraged and promoted for minor adaptations

PART I Rapid Response Adaptations Programme (RRAP)

- 11.1 The RRAP scheme is funded by the Welsh Assembly, administered by Care and Repair Cymru and delivered by the national network of Care and Repair Agencies, in partnership with their local authorities and local health service providers. The 3 year pilot scheme commenced in June 2002. Between June 2002 and March 2004, RRAP received funding of £1.5m. A further £1m was allocated for 2004/5.
- 11.2 The scheme focuses on facilitating hospital discharge (reducing delayed transfer of care) by enabling quick, essential works of minor adaptation and repair. A secondary aim is to work with health, housing and social care professionals to undertake similar works of small repairs and adaptations, to prevent hospital admissions or re-admissions. The key features of the scheme are:
- Older and or disabled home owners/ private tenants are eligible
 - Maximum allowable RRAP cost is £350 per job
 - Target maximum number of days from referral to completion of works is 15 days
 - Scheme is a partnership between local Care and Repair Agency, Health, Social Care and Housing. Referrals must be made by partner agencies, and for the purpose set out under the scheme
 - Works are undertaken in the majority of cases by local Care and Repair agency in house handy-person services
- 11.3 During interviews with local authorities, discussions were held about the operation and effectiveness of the RRAP programme. The following summarises local authority views:
- 100% of local authorities thought that the scheme was effective and working well
 - 14 from 21 authorities indicated that funding ran out in their area before the end of the year
 - 13 from 21 local authorities indicated that the level of referrals from Health were high or very high. Sometimes up to 100% of referrals were from Health.
 - 11 from 21 authorities (52%) topped up RRAP budgets locally, or had developed similar schemes using similar “partnership” referral mechanisms.
 - Only 1 authority indicated any top up funding from local Health service providers, despite its success and popularity amongst health professionals

- 4 from 21 authorities (20%) indicated that they felt a similar programme was needed for Council tenants. 2 of these authorities had started similar schemes from their own resources for Council tenants
- 11.4 Evidence provided by Care and Repair Cymru demonstrates the success of RRAP during the first 18 months:
- Capital cost of £1.5m
 - 10,416 people helped
 - 3,277 people helped leave hospital early
 - Average cost per job £134
 - Average time to complete work 7.5 days
 - Has greatly increased on the ground dialogue and partnership working between Housing, Social Care and Health professionals
 - Savings against Health budget estimated at £7.8m. This is based on the average weekly cost of a hospital bed being £378.15, the average weekly cost of residential care being £374, and an assumption that that the 10,416 service users returning home (from hospital or residential care) 2 weeks earlier than they otherwise would have without RRAP.
 - Scheme delivers on the Assembly's preventative strategies for making homes of older people safe, enable older persons to remain living independently at home and providing safe homes for carers
 - RRAP contributes the Wanless report agenda in terms of enabling greater independent living.
- 11.5 The scale of work undertaken under RRAP is small compared with the type and value of adaptations undertaken through DFG. It is clear however that RRAP has become an important part of local authority's overall systems for delivering adaptation services, and clearly complements, and in some cases reduces the load on the DFG system at the lower end of the scale.

RAPID RESPONSE ADAPTATIONS PRGRAMME- CONCLUSIONS

1. RRAP has been highly successful in delivering a quick and effective programme of minor adaptations and small repairs that have made a real difference in allowing people to return home from hospital and care, and in preventing admissions and re- admissions.
2. RRAP is highly valued by local authorities and health service providers, and has facilitated closer partnership work between service providers in these different sectors
3. The scheme is oversubscribed, and there is clear evidence that money allocated falls short of what could be spent
4. More than 50% of local authorities Housing and Social Services have topped up RRAP budgets , or in some cases developed parallel schemes using the referral mechanisms and networks set up through RRAP.
5. Resources to supplement RRAP from local Health service providers has, with only one exception, not been provided, despite its success and popularity with Health professionals.
6. There is a case for investigating the possibility of extending a RRAP type (or a similar scheme) to council and RSL tenants, so that the benefits identified above can be delivered irrespective of tenure.

RAPID RESPONSE ADAPTATIONS PRGRAMME - RECOMMENDATIONS

1. That the RRAP programme is confirmed as continuing beyond the initial 3 year pilot proposal.
2. That money allocated to the programme is increased to reflect increasing demand for RRAP, within the clearly defined parameters of the programme aims and eligibility
3. That consideration is given to the source of funding (ie use of health and social care budgets) for the programme in future years, so that this reflects what the programme delivers in terms of health and social care objectives.
4. That introducing a RRAP type programme, available for social housing tenants, delivered through the networks and partnerships already developed, be investigated.

APPENDIX 1

LOCAL AUTHORITY QUESTIONNAIRE

National Review Of Disabled Facilities Grants And Housing Adaptations

DFG and Adaptations Questionnaire, Local Authorities

This questionnaire is part of a comprehensive review of the delivery of housing adaptations and disabled facilities grants in all housing tenures, across Wales. The results will be used to inform decisions on recommendations for changes to the current arrangements to help improve the delivery of housing adaptations to owners and tenants.

ALL DATA REQUESTED IS FOR THE FINANCIAL YEAR 2003-2004

Name of Local Authority	
Contact name	
Job title	
Telephone number	
e-mail address	

1.0 RESOURCES

The aim of this part of the questionnaire is to identify

- *the level of capital funding being used for DFGs and housing adaptations, and spend trends over recent years*
- *sources of funding*
- *average costs and numbers of adaptations.*

1.1 Please insert in the following table your **actual year end spend** figures, for each of the years shown, from 2001/2 to 2003/4

2 Year	DFGs (including council house DFGS)	Council house adapts. (from housing revenue account)	Home Repairs Assistance (Adapts. only)	Social Services funded minor Adaptations	S.S. adaptations (funded due to CSDPA 1970 duty)
2000/2001					
2001/2002					
2002/2003					
2003/2004					

1.2 The following table explores the different cost ranges of DFGs and adaptations. Please insert in the boxes the **numbers of completed** DFGs/ adaptations for 2003/4

Cost Range	DFGs (including Council tenant DFGs)	Council house adaptations (housing revenue account funded)	All other adaptations not funded by DFG or Housing revenue account
£0-£3000			
£3001-£5000			
£5001-£7,500			
£7,501-£10,000			
£10,001-£15,000			
£15001-£20000			
£20,001-25,000			
£25,000+			

2.0 OVERALL TIMESCALES AND WAITING TIMES

We need to understand, across Wales, the time clients wait for DFGs and housing adaptations, from the time they first enquire about adaptations to the time the work is finished. Within this overall time will be the time taken for the OT assessment, time taken from the OT assessment to work being specified and ordered/grant approved by housing officers and the actual building time to do the work. It is recognised that some of this time will be outside the hands of the local authority, particularly time taken waiting for the client to submit applications and paperwork, and the time taken for builders to start and finish work.

- 2.1 The following tables split the overall process into different stages. The first table is for **DFGs only**, the second table is for **major adaptations costing over £5K (non DFG) in council properties**. Please state against each stage what your actual performance was in 2003/4. If you need to, prepare your own timeline in the blank table (e.g. if you carry out DFG work using Home Repairs Assistance or wish to describe something that more accurately reflects the process in your own authority)

A. DFG Timeline Table

Stage of process	Actual 2003/4 (weeks)
First enquiry, to referral to OT	
Referral to OT, to OT assessment	
OT assessment, to OT report/recommendations	
Receipt of OT report/recommendations, to housing surveyor visit	
Housing surveyor visit, to sending out schedule of works	
Schedule of works sent to applicant, to grant application being received	
Application received, to grant approval	
Grant approval, to works completed	
TOTAL TIME- FIRST ENQUIRY TO WORK COMPLETION	

B. Council House Major Adaptations > £5000 (Non DFG) Timeline Table

Stage of process	Actual 2003/4 (weeks)
First enquiry, to referral to OT	
Referral to OT, to OT assessment	
OT assessment, to OT report/recommendations	
Receipt of OT report/recommendations, to housing surveyor visit	
Housing surveyor visit, to preparing scheme of works	
Scheme of works prepared to works being ordered	
Works ordered, to works completed	
TOTAL TIME- FIRST ENQUIRY TO WORK COMPLETION	

C. Use The Table Below If You Need To Describe Your Own Processes

Stage of process	Actual 2003/4 (weeks)
TOTAL TIME - FIRST ENQUIRY TO WORK COMPLETION	

3 OCCUPATIONAL THERAPY ASSESSMENT ISSUES

It is widely documented that there are national shortages of O.T.s, and that the time taken for an OT assessment is a significant factor in delays for DFGs and housing adaptations. This part of the questionnaire is to determine the extent of problems in Wales.

3.1 How many “referrals for assessment” were made to the Occupational Therapy Service in 2003 –2004?

3.2 What on average is the waiting time in your authority for an Occupational Therapy assessment to be carried out, following a request for assessment (whether this is directly by the client or through a referral from somewhere else eg housing department). Please give your answer in weeks.

 Weeks

3.3 Does your authority use OT assistants, or other non OT qualified staff, to undertake assessments for DFGs/ Adaptations?

Yes No

3.4 If yes, please describe your policy on this below:

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

3.5 Does your authority use self-assessment as a tool for diagnosing need and prescribing adaptations?

Yes No

If ‘Yes’, please briefly describe.

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

3.6 Do you have a process for prioritising requests for assessment visits?

Yes No

If 'Yes', use the table below to describe your different priority categories and the average waiting time against each priority category.

		Average waiting time for assessment (weeks)
Priority 1		
Priority 2		
Priority 3		
Priority 4		
Priority 5		

3.7 Do you have a process for prioritising clients for adaptations **after** the OT has visited to assess?

Yes No

If yes, please describe different priorities and target time-scales below (eg you may have a shorter target time-scale for a housing surveyor visit for higher priority cases)

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

3.8 Please describe below any additional information on how OT assessment waiting lists are managed or any initiatives you have to minimise waiting times. (please include details of how you utilise OT assistants and private/ agency O.T.s as appropriate)

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

4.0 ADAPTATIONS FOR CHILDREN

In Northern Ireland, the means test for dependent children DFGs has been abolished. As part of this review we are also considering the issue of the parental means test for disabled children DFGs. It is perceived by some that applying the means test in these situations is unfair as cases usually relate to young families with mortgages, with unavoidable mortgage (or rental) costs plus other out-goings connected to caring for the child that are not taken into account under the current means test. When a child becomes non- dependent at 17 or 18, the means test is undertaken on the disabled child and there is usually a nil contribution. When the means test is carried out on older disabled persons, invariably there are no mortgage or rental out-goings and again there is usually a nil contribution.

4.1 The table below is to assess the scale of demand for childrens’ adaptations across Wales, and the extent of the problem of adaptations not going ahead due to the parental means test for dependent children. **Please provide figures for 2003/4**

a) Number of requests for children DFGs (where there was a parental means test)	
b) Number in a) above that proceeded to approval	
c) Number in a) above that did not proceed because the means tested contribution was too high for parents to afford	
d) Average cost of approved childrens’ DFGs i.e. in b)	
e) Average means tested contribution for approved childrens’ DFGs ie those in b)	
f) Average means tested contributions for cases in c) above ie those that did not proceed to approval	

4.2 Do you think that the means test in relation to dependent children is unfair? Yes No

4.3 What are your views on whether the means test should be abolished, or amended or any other views on dependent children DFGs?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

4.4 Have you used Regulatory Reform Housing Assistance (England and Wales) Order 2002 flexibilities to implement any local policies specifically in relation to the means testing of DFGs for dependent children?

Yes No

If 'Yes', please briefly describe.

.....

5.0 COUNCIL TENANT DFG/ADAPTATIONS AND EFFICIENT USE OF ADAPTED HOUSING

5.1 Does your authority use DFG for council house major adaptations, or does it fund these through housing revenue account?

	<i>Please tick</i>
DFG	<input type="checkbox"/>
Housing Revenue Account	<input type="checkbox"/>
Both	<input type="checkbox"/>

If you use both ie sometimes DFG sometimes housing revenue account, please describe your policy/practice

.....

5.2 If you use DFG for tenants, how is their means tested contribution met?

By tenants	<input type="checkbox"/>
From housing revenue account	<input type="checkbox"/>
Other	<input type="checkbox"/>

5.3 If other, please describe:

.....

5.4 a) Does your authority have a Register of Adapted Properties i.e. an up to date database containing information on properties suitable for people with disabilities?

Yes No

If 'Yes', please briefly describe.

.....

.....

.....

.....

.....

.....

.....

.....

.....

5.5 Does your Register of Adapted Properties contain information on the following?

Please tick

The way in which the property has been adapted
Dates of works and installation
Details of purpose built properties

5.6 How do you match suitably adapted properties on your register to persons in housing need ie persons who have applied for housing adaptations ?

.....

.....

.....

.....

.....

5.7 In cases involving major adaptations do you give consideration to re-housing in either local authority, Registered Social Landlord [RSL] or private sector housing?

Please tick

Local authority
RSL
Private sector

5.6 Have you used the Regulatory Reform Order 2002 to establish a policy to provide assistance with moving to a more suitable property as an option?

Yes No

If 'Yes', please briefly describe.

.....

.....

.....

.....

.....

.....

.....

.....

.....

6.0 CHRONICALLY SICK AND DISABLED PERSONS ACT 1970

Social Services Departments have an overarching duty under section 2 of this legislation to assess the needs of disabled persons for housing adaptations, and meet those needs. In effect, the vast majority of need is met by mandatory DFGs under housing legislation. For those cases where need is not met by DFG, evidence points to widely different approaches across Wales as to how Social Services deal with the CSDPA. This part of the questionnaire explores this further.

6.1 If clients are found **not** to be eligible for DFG eg because of the means tested contribution, or because the cost of works exceeds the maximum grant, are they advised of other available options?

Yes No

6.2 If yes, what options are they advised of eg Social care funding via CSDPA, possibility of health funding (NHS or LHB), charitable funds

.....
.....
.....
.....
.....
.....
.....
.....

6.3 If assistance is provided by SS under CSDPA , does the Social Services Department operate their own means test?

Yes No

If 'Yes', please briefly describe.

.....
.....
.....
.....
.....
.....
.....

7.0 DFG/ADAPTATIONS IN REGISTERED SOCIAL LANDLORD STOCK

7.1 Does your authority have agreements with local RSLs on how adaptations for tenants in their properties are provided?

Yes No

If yes, please describe:

.....
.....
.....
.....
.....
.....

7.2 How would you generally describe your approach to providing DFGs for RSL tenants/RSL properties?

.....

.....

.....

.....

7.2 How did you fund adaptations in RSL properties in your area in **2003/4**?

Name of RSL	No. of DFGs completed	Total value of completed DFGs	No of adapts. completed from PAG*	Total value of completed PAG*	No. of adapts. completed from RSL own resources	Total value of completed adapts from RSL own resources

*PAG- Physical Adaptations Grant, paid directly to R.S.L.s for adaptations to their properties

7.3 What are your views and experiences of the provision of DFGs/ adaptations in RSL properties?.

.....

.....

.....

.....

.....

.....

Please return this questionnaire by **16 July 2004** to:

Chris Jones
Welsh Assembly Government
Housing Directorate
Cathays Park
Cardiff
CF10 3NQ

E-mail address: chris.jones@wales.gsi.gov.uk
 Tel: 02920 823558

APPENDIX 2

R.S.L. QUESTIONNAIRE

National Review Of Disabled Facilities Grants And Housing Adaptations

Adaptations and DFG Questionnaire, Registered Social Landlords

This questionnaire is part of a comprehensive review of the delivery of housing adaptations and disabled facilities grants in all housing tenures, across Wales. The results will be used to inform decisions on recommendations for changes to the current arrangements to help improve the delivery of housing adaptations to owners and tenants.
ALL DATA REQUESTED IS FOR THE FINANCIAL YEAR 2003-2004

Name of RSL	
Contact name	
Job title	
Telephone number	
e-mail address	

1.0 FUNDING

- 1.1 Please specify the numbers, cost of works and funding sources of adaptations carried out in your properties **in 2003/4**, as indicated in the box below. This is to help us understand the level of demand for adaptations in RSL stock, and how adaptations are currently funded...

Funding source	Number of properties adapted (completions)	Total cost of works
Disabled Facilities Grants		
Physical Adaptations Grant (PAG) direct from the National Assembly		
Own resources		
Other		
<u>Totals</u>		

1.2 How would you generally describe your approach to funding adaptations in your properties?

Please tick all that apply

- All our tenants apply for DFG
- Some apply for DFG, some we resource ourselves (either our own resources or PAG)
- We resource all tenant adaptations ourselves (either our own resources or PAG)
- We have never applied for PAG
- We resource low cost, minor adaptations ourselves but access PAG for more major works
- We resource low cost, minor adaptations ourselves but our tenants apply for DFG for more major works

1.3 If the descriptions in 1.2 do not cover your approach, please expand here:

.....

.....

.....

.....

.....

1.4 What is your understanding of Physical Adaptations Grants (PAG), in relation to the application process, eligible works, minimum and maximum amounts, the role of occupational therapists and any other points you wish to make

.....

.....

.....

.....

.....

.....

.....

.....

.....

2.0 OCCUPATIONAL THERAPIST ASSESSMENTS

2.1 What are your views on the role and adequacy of current arrangements in relation to occupational therapists in PAG and DFGs.

Please tick all that apply

- Arrangements for OT assessments are satisfactory
- We have used private/ Agency OTs to speed up assessment for tenants when our own resources or PAG used
- We have used private/ Agency OTs to speed up assessment for tenants who have applied for DFG
- We are considering the use of private/Agency O.T.s
- We employ an OT directly to do adaptation assessments for our tenants
- We do not feel it necessary for an OT to make an assessment for low cost works

2.2 Do you have any additional comments on arrangements for OT assessments?

.....
.....
.....
.....
.....
.....

3.0 YOUR PROCESSES FOR TENANTS

3.1 Do your internal processes include the following, please tick **all** that apply.

Please tick all that apply

- We have information / literature that gives advice to tenants on how to get adaptations done
- We always visit tenants to advise on how to get an adaptation done
- We generally refer tenants to the local authority for their DFG service
- When tenants enquire about adaptations, we consider re-housing to a more suitable property
- When tenants enquire about adaptations, we consider the option of providing a new build property
- We have a handy-person service for quick, low value adaptations

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

3.2 How would you describe your allocations policy in relation to persons with a disability and re-letting of adapted properties?

.....
.....
.....
.....
.....
.....
.....
.....
.....

3.3 Do you keep a register of adapted properties?

Please tick

- Yes
- No

<input type="checkbox"/>
<input type="checkbox"/>

3.4 If yes, how do you make use of the register/database in relation to requests for adaptations or your allocations policy?

.....
.....
.....
.....
.....
.....
.....
.....

4.0 GENERAL.

4.1 What do you feel are the strengths and weaknesses of the current system for DFGs and Housing Adaptations in Wales?

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

4.2 What changes do you think are needed to improve the speed at adaptations are undertaken and the quality of adaptation services generally?

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

4.3 Do you have any additional comments?

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

Please return this questionnaire by **9th July 2004** to:

**Chris Jones
Welsh Assembly Government
Housing Directorate
Cathays Park
Cardiff
CF10 3NQ**

E-mail address: chris.jones@wales.gsi.gov.uk

APPENDIX 3

VOLUNTARY ORGANISATIONS QUESTIONNAIRE

National Review Of Disabled Facilities Grants And Housing Adaptations

DFG and Adaptations Questionnaire

This questionnaire is part of a comprehensive review of the delivery of housing adaptations and disabled facilities grants in all housing tenures, across Wales. The results will be used to inform decisions on recommendations for changes to the current arrangements to help improve the delivery of housing adaptations to owners and tenants.

Name of organisation	
Contact name	
Job title	
Telephone number	
e-mail address	

1.0 RESOURCES

What are your views and experiences about the level of resources available for DFGs, council house adaptations and RSL adaptations, at a national and local level? Also, please make any other points you wish about funding of DFGs and adaptations.

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

2.0 LEGISLATION

There is a wide range of legislation relating to housing adaptations for disabled people. Social Services Departments have duties under, for example, the Chronically Sick and Disabled Persons Act 1970, NHS and Community Care Act 1990, and the Children’s Act 1989; and Housing Departments have duties in relation to providing mandatory DFG under the Housing Grants Construction and Regeneration Act 1996

- 2.1 What are your views on how effectively this legislation works for DFGs and housing adaptations? What problems or concerns do you have, if any, in relation to the legislative framework?

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

3.0 TIMESCALES AND WAITING TIMES

We need to understand, across Wales, the time clients wait for DFGs and housing adaptations, from the time they first enquire about adaptations to the time the work is finished. Within this overall time will be the time taken for the OT assessment, time taken from the OT assessment to work being specified and ordered/grant approved by housing officers and the actual building time to do the work. It is recognised that some of this time will be outside the hands of the local authority, particularly time taken waiting for the client to submit applications and paperwork, and the time taken for builders to start and finish work.

- 3.1 What are your views and experiences about the length of time the **whole** process of providing adaptations for disabled persons and what you feel might help to reduce waiting times?

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

3.2 What is your experience of waiting times specifically for an **Occupational Therapy (OT) assessment** to be carried out?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

3.3 What improvements do you think could be made to speed up the need assessment process?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

3.4 Do you feel that self-assessment might be a useful tool for diagnosing need and prescribing adaptations?

Yes No

Please expand your views (or concerns) about self assessment here:

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

3.5 Please describe below any additional information on how OT assessment waiting lists are managed or any ideas you might have to minimise waiting times

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

4.0 ADAPTATIONS FOR CHILDREN AND MEANS TESTING

In Northern Ireland, the means test for dependent children DFGs has been abolished. As part of this review we are also considering the issue of the parental means test for disabled children DFGs. It is perceived by some that applying the means test in these situations is unfair as cases usually relate to young families with mortgages, with unavoidable mortgage (or rental) costs plus other out-goings connected to caring for the child that are not taken into account under the current means test. When a child becomes non- dependent at 17 or 18, the means test is undertaken on the disabled child and there is usually a nil contribution. When the means test is carried out on older disabled persons, invariably there are no mortgage or rental out-goings and again there is usually a nil contribution.

4.1 Do you think that the means test in relation to dependent children is unfair? Yes No

4.2 What are your views on whether the means test should be abolished, or amended or any other views on dependent children DFGs?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

4.3 Do you think that the means test generally works fairly, or are there any groups who are adversely affected under the current means test?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

4.3 In your experience, have any local authorities used the Regulatory Reform Housing Assistance (England and Wales) Order 2002 flexibilities to implement any local policies specifically in relation to the means testing of DFGs for dependent children?

Yes No

If 'Yes', please briefly describe any good practice you have encountered

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

5.0 HOUSING TENURE ISSUES

5.1 In your experience, do local authorities use DFG for major council house adaptations, or does it fund these through housing revenue account?

DFG
 Housing Revenue Account
 Both

Please tick

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Please expand your reply if you wish here

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

5.2 What are your views on whether housing adaptation services are provided equitably to people in different housing tenures, and what, if any, changes to current arrangements would you like to see?

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

6.0 GENERAL

Please let us know any other points you wish to make about DFG and housing adaptations.

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

Please return this questionnaire by **30th August 2004** to:

Chris Jones
Welsh Assembly Government
Housing Directorate
Cathays Park
Cardiff
CF10 3NQ

E-mail address: chris.jones@wales.gsi.gov.uk
Tel: 02920 823558

APPENDIX 4

VOLUNTARY ORGANISATION QUESTIONNAIRE RETURNS

1. Contact a Family Wales
2. Disability Wales
3. Age Concern Cymru
4. Motor Neurone Disease Association
5. Care and Repair Cymru
6. Shelter Cymru
7. RNIB Cymru

3 VOLUNTARY ORGANISATIONS VISITS/INTERVIEWS

1. Contact a Family Wales
2. Motor Neurone Disease Association
3. Care and Repair Cymru
4. RNIB Cymru

*** NB Questionnaire return, and meeting also held with Welsh representatives of the College of Occupational Therapy**

APPENDIX 5

LOCAL AUTHORITY AND RSLs INTERVIEW SCHEDULES

Brief Terms of Reference run through:

- Synergy of legislation
- Funding arrangements
- Waiting times/ Delays
- DFG means test for dependent children
- Adaptations for council tenants, Welsh Housing Quality Standard and Stock transfer implications
- Adaptations for RSL tenants
- Efficiency of use of adapted housing stock eg registers, matching, allocation policies
- Rapid Response Adaptations Programme, and minor adaptations

Review methods run through:

1. Postal questionnaires- 22 Welsh L.A.s, 28 RSLs
2. Visits and interviews with 22 Welsh L.A.s and selection of RSLs (Approx 6-8)
3. Interviews with key partners- WLGA, WFHA, CIH Cymru, CIEH Cymru, Age Concern Cymru, Care and Repair Cymru, Shelter Cymru, Disability Wales, Contact a Family Wales
4. Interviews with a selection of DFG recipients, particularly families
5. Observers on ODPM steering group for English DFG review
6. Visits/ discussions with English, Scottish and Northern Ireland authorities and Northern Ireland and Scottish Executives
7. Internal consultation at Assembly with Health, Social Care, Social Services Inspectorate, RSL management and other relevant colleagues
8. Seminar and conference presentations eg North Wales Grant Officers Group, COTSSIH Conference, Care and Repair Cymru Conference, Wales Heads of Environmental Health seminars

LEGISLATION

- What are your views on how well legislation works?
- What are pitfalls and overlaps?
- Any other points?

FUNDING

- What do you think about national funding arrangements?
- Do you have concerns locally about DFG/ adaptation funding?
- What is your approach to funding (*council tenant/RSL*) adaptations- (eg do you use DFG, do you means test tenants, what about PAG)?
- What has the effect been of the introduction of Major Repairs Allowance (MRA) on DFG and adaptation budgets? (LAs)

- What is your authority's view on MRA not being able to fund council tenant DFGs (LAs)
- Do you have any other points you wish to make about funding?

DELAYS

- Where are your biggest problems with delays locally?
- How are you dealing with any delay/waiting time issues?
- Do you have local P.I.s for DFG/adaptations?
- Do you think a national P.I. for DFG/ adaptation waiting time would be helpful?
- How well is RRAP working in your area and do you think a larger RRAP programme would help deal with demand at the lower cost end?
- Do you use private O.T.s to undertake assessments for your tenants? (Only RSLs)

DFG MEANS TEST FOR DEPENDENT CHILDREN

- What do you think of the current arrangements whereby parents are means tested for children adaptations?
- Is this something you have looked at recently with the introduction of flexibilities under Regulatory Reform Order?
- What is the demand for children adaptations in your area and how many adaptations don't go ahead because of the parental means test?

LOCAL AUTHORITY TENANTS

- What is your organisational approach/delivery route for your own tenants?
- What funding do you utilise for your own tenants?
- How do you deal with small, low cost adaptations?
- Are adaptations included as part of your business plans for meeting the WHQS?
- What will your approach to adaptations be if you transfer your housing?

EFFICIENCY OF USE OF ADAPTED HOUSING STOCK eg REGISTERS, MATCHING, ALLOCATION POLICIES

- Do you re-house rather than adapt in certain situations?
- What about the private sector- do you help owners move rather than adapt where it is too expensive or not feasible to adapt?
- Do you have a register of adapted house and if you do, how do you manage the best use of this?
- What steps do you take to ensure that new tenancies, or transfers, will not result in major adaptations being requested by the tenant in the property they move to?

ADAPTATIONS FOR RSL TENANTS (Qs for LAs)

- What is your approach to adaptations for RSL tenants?
- Do your local RSLs fund adaptations themselves, or by PAG?

- What are your views generally on how adaptations should be provided and funded in RSL properties?

RRAP AND MINOR ADAPTATIONS

- How do you think this programme is working?
- Is there funding sufficient- is there any local top up used?
- Are the partnership arrangements working well?
- Do you fast track low cost adaptations for your tenants by providing them directly without involving the local authority? (RSLs only)

GENERAL

- Do you have any other points you want to make in relation to DFGs and adaptations?

APPENDIX 6

LITERATURE REVIEW

a) Adaptations, finding ways to say yes, Frances Heywood, 1994

The aim of this study was to identify examples of good practice in delivering adaptations across Wales and England. The key findings, were set out by a JRF “Findings” report and are summarised below:

- A wide variance of provision of disabled facilities grants across Wales and England. In the period 1990-92, some housing authorities gave 100 times more grants per thousand dwellings than others. Similarly, whilst some social services departments gave no help to those unable to afford ‘contributions’ assessed under a means test, others had substantial ‘top-up’ budgets
- Families of dependent disabled children were particularly disadvantaged: they often required more expensive adaptations but were more likely to be in work. Their assessed contribution to the cost of adaptations was therefore likely to be high, (but their ability to afford the contribution was affected by mortgage commitments. Older homeowners on the other hand were likely to have low or no mortgage)
- The most common procedural problems described by disabled clients interviewed were lack of information, long delays for assessment, delays in implementation and lack of control over what is being done in their homes.
- Users wanted access to independent advocacy or support when adaptations are being planned.
- Users stressed that adaptations did not diminish the need for appropriate home care.
- Some authorities had successfully restructured their occupational therapy service, thus clearing huge backlogs of people waiting for assessment and establishing minimal future waiting times.
- Some authorities used minor works grants as a swift and flexible way of providing adaptations. However, minor works grants were not available in all areas, leaving some people at a considerable disadvantage, depending on where they lived.
- In some areas Staying Put, Care and Repair and other non-profit-making ‘home improvement agencies’ provided advocacy support and a co-ordinating role in carrying out adaptations. They also freed occupational therapists to concentrate on assessments.

b) Funding Adaptations, the Need to Co-operate, Frances Heywood with Gavin Smart, 1996

This research outlines the complexities of funding sources for housing adaptations, and the reasons for this. In summary, the research identifies that this stems initially from the NHS and Community Care Act 1990, which

set the framework for Care in the Community at the time. Joint circulars and guidance issued by Government Departments emphasised the importance of housing in making community care work, but no adequate financial provision was made available. Community Care has been successful in helping many people remain living in their own homes, but the scale of need for adaptations to facilitate this was not foreseen. As a consequence, funding has come from a number of sources:

- Disabled Facilities Grants (DFG)
- Council Housing revenue and capital budgets
- Registered social landlords
- Social Services

The Chronically Sick and Disabled Persons Act (CSDPA) 1970 places a specific duty on social services departments to ensure that adaptation needs are met. The Local Government and Housing Act 1989, (as amended by the Housing Grants Construction and Regeneration Act 1996) requires local housing authorities to provide mandatory DFG. In effect, this “subcontracts” social services duty under the CSDPA 1970 to the housing authority.

Other key findings of the research are:

- Between 1990 and 1996, requests for housing adaptations increased at 15% per year
- The introduction of mandatory DFG in 1990 led to significant growth of spending on DFGs in Wales- an increase of 53% between 1989 and 1994. During the same period, spending in England did not increase significantly. The researchers concluded that arrangements in Wales provided a better match between needs and resources than in England.
- In Wales, adaptations for existing tenants were carried out through the DFG system.
- The average wait for an occupational therapist assessment of 20 weeks across Wales and England was a major issue in many places in relation to delays.
- Parents of (dependent) disabled children often had difficulty in meeting their means tested contributions towards the cost of adaptations, due to mortgage commitments (“unavoidable out-goings”). Only 18% of social services departments used Section 17 funding from the Children’s Act 1989 to help pay for children’s adaptations. The researchers concluded that children’s adaptations require long term planning and will cost on average three times more than adult adaptations.

c) Disabled Facilities Grants, is the system working? A survey by Age Concern and RADAR, 1999

In 1998, Age Concern and RADAR produced a 10 point checklist to encourage local disabled persons/ groups to assess how well their local authority “measured up” in terms of Disabled Facilities Grants good practice and efficient procedures. Responses covering 89 local authorities were received. A summary of the findings is:

- In 66% of areas it was relatively easy to find out about DFG, although only 1 in 4 of these areas provided an information booklet. In nearly 30% of areas, it was considered difficult to find out about DFG and there was also a lack of awareness in these areas amongst local government staff. Generally, there was little evidence in many areas of attempts to actively promote DFGs
- In 89% of areas, council tenants adaptation processes were similar to those for DFG applicants. However, in 11% of areas, council tenants were subject to different rules and were refused adaptations in certain situations
- In over 35% of areas, there were no target times for processing DFGs, not even the legal 6 month time-scale. Where there were targets, target times varied hugely and different areas started measuring from different points in the process. Benchmarking is therefore very difficult. National performance indicators would enable meaningful comparison
- Responses from users showed that waiting time for an occupational therapist assessment was an area of tremendous discontent. Only just over half of the areas could give an average waiting time, and this was often unacceptably long. In some areas the waiting time was up to two years
- In 65% of areas, there was little or no priority system
- 45% of authorities did not operate joint teams or work closely together
- In over half the areas, the name of a key worker was given to applicants, but in 45% of areas, applicants are not given the name of a key worker or point of contact
- Over 50% of local authorities did not carry out any consultation with older or disabled people about adaptation services. Of those that did, it was mainly in the form of customer satisfaction surveys
- In most areas, there was no financial assistance with those who wished to move to more suitable accommodation
- 56% of authorities did not keep a register of properties that have been adapted. Of those who do keep registers, nearly half only record adaptations to social housing.

d) Changing Rooms, a survey of the adaptations service in six Welsh authorities and the outcomes for service users with physical disabilities, Elizabeth Higham, 1999

The stated aim of this study was to give some indication of the situation in a sample of local authorities in Wales, to identify examples of good practice and make recommendations for improvements. Six local authorities in Wales were studied and their officers interviewed. A postal questionnaire and interviews with service users was also conducted. A summary of findings is:

- The importance of providing adaptations should be more widely recognised and become a more central aspect of Care in the Community

- Genuine joint working in local authorities is needed to overcome the complexity of legislation and hence funding sources that cover housing adaptations
- Delays in providing an adaptation is the most frequent problem mentioned by users. Some people endure a long wait during which they have to cope with increasing pain and discomfort and having their every day activities severely limited by their surroundings.
- In some authorities, users still have to wait for up to 2 years for an adaptation. The three main causes are occupational therapist assessment time, inefficiencies of joint working between L.A. departments and delays in the time to carry out work by Council House Departments for their tenants.
- Other causes of delays mentioned were test of resources for DFG, and the building process including planning permission, getting builders estimates etc. These are sometimes, but not always, outside the control of the local authority

As summary of the researcher's recommendations were:

- An efficient one stop shop referral system for accessing the service
- Significant improvements to the availability and quality of publicity and information about services
- Better joint working and collaboration between housing and social services
- Single point of contact (key worker) for clients
- Improved post work completion procedures to ensure clients can effectively use adaptations provided
- Improved complaints procedures
- Local authorities should keep registers of adapted properties and agree appropriate policies locally to enable disabled persons in need to be matched with available properties
- A need for performance indicators or charter standards to improve local performance on adaptations
- Improve the coverage of adaptation services within Social Care Plans

e) Money well spent: The effectiveness and value of housing adaptations, Frances Heywood, 2001

This study was carried out across Wales and England during 1999-2000. It considered the long term effectiveness and use of housing adaptations in the homes of disabled persons. The main results were set out in a Joseph Rowntree Foundation "Findings" report, August 2001, and are summarised below:

- Minor adaptations, such as grab rails and hand rails, produced a range of lasting positive consequences
- Major adaptations such as bathroom conversions, stair-lifts, throughlifts, extensions transformed people's lives for the better
- The evidence from recipients of Disabled Facilities Grants and adaptations from other funding sources suggested that successfully

delivered adaptation services deliver on key policy objectives such as speeding up hospital discharge and helping preventing admissions, promoting social inclusion and reducing strain on carers

- Failed adaptations and waste occurred due to a variety of reasons, notably due to:
 - inadequate user consultation leading to poor specification and providing adaptations not ultimately wanted by end users
 - professionals working to rigid rules and policies
 - delays leading to outdated assessments, accidents and hospitalisation of clients whilst they were waiting, and habits of dependency becoming established, which were then hard to unlearn.
- The research concluded that spending on adaptations appeared to be a highly effective use of public money, and that investment of health resources to increase funding for adaptations could well be justified

f) Older people and Participation within Disabled Facilities Grant Processes, British Journal of Occupational Therapy, Darren Awang, 2002

This research focused on the experiences of service users in relation to how well DFG services were publicised, how easy it was to access the system, and their experience of the level of participation and involvement once in the system. The study was limited in that only two local authorities and one Care and Repair Agency in England were studied. The main findings were:

- General publicity and information about DFGs was poor and there was a reluctance to publicise services that were generally under-resourced and oversubscribed. As a result of this, there is a danger that those who most need adaptations to support independent living are unaware of the services available
- For those who did access the system, there was a tendency for the amount and complexity of information to lead to users dropping out of the system
- Some user choice was seen, in relation to adaptation design, and the choice to ask a “technical officer” to organise the work
- Overall, participatory levels were low, with the emphasis being on service provider control rather than service user control. Postal surveys were used but these did not really result in true user involvement or a chance to feedback about the system
- One authority had recently set up a user group, the idea of which was well received by users but which was still in the early stages of development

g) Housing for Disabled People, Equal Adaptations, Nigel Appleton with Ruth Wilson, 2003

The purpose of this study, undertaken on behalf of Care and Repair Cymru, was to “establish the characteristics of the adaptation service

delivered to tenants of local authority housing in Wales”. Ten Welsh authorities responded to the survey.

- 70% of responding authorities indicated that they did not have different arrangements for receiving requests for adaptations from local authority tenants
- Only 30% of authorities used DFG for council tenants
- No local authority indicated that Social Services funded adaptations for their tenants
- There were significant variations on equality of service delivery linked to geographical location ie the local authority area lived in affects the quality of service, including waiting time
- The experience from LSVT in England is that the new organisations are reluctant to sustain the same level of expenditure previously provided by the local authority, and as a consequence local DFG budgets are put under additional pressure
- The absence of procedures, paperwork and the means test associated with DFG provides a less complex route for the provision of adaptations to council tenants
- The use of an occupational therapist assessment for all but the smallest adaptations is widespread. Good practice elsewhere suggests that there is scope for self assessment and authorisation by other professionals to access adaptations in suitable circumstances.
- In all surveys of users of adaptation services, the strongest request for improvement is in time-scales. This study reveals wide variations in practice and time-scales that stretch into years. There is a need for clear guidance on appropriate time-scales

h) The Impossible Took a Little Longer, Brendon Mckeever, Family Information Group, 2004

This publication outlines the work of the “Homes Fit for Children” campaign to abolish the means test for disabled children DFGs, focusing in particular on the campaign in Northern Ireland. It gives a detailed chronology of the campaign, culminating in abolition of the means test in Northern Ireland in February 2004. The work includes an outline of the problems perceived with the means testing system, in particular the low financial allowances for housing costs and costs of bringing up a disabled child not being taken sufficiently into account. It also concludes that, irrespective of the shortcomings of the means test: *“It is the right of every child to have a safe, accessible home. Means testing parents of disabled children is a barrier to that right”*.

i) Building in Evidence: Reviewing Housing and Occupational Therapy, Darren Awang 2004

This study was undertaken between July 2002 and June 2003. The aim of the work was to identify and appraise the quality of selected published and grey literature relating to housing and occupational therapy. In effect, Awang’s work summarised and evaluated the available research, both published and unpublished, in the field of housing and occupational therapy.

23 items are evaluated, ***some of which have already been covered above in this literature review***. A selection of other work covered, as set out in “Building in Evidence etc...” is as follows:

Adams, 1996: This research project, part of a Masters degree, investigated various issues within a County boundary in England. Some of the key problems identified were poor DFG publicity and complexity of grant information, and the potential difficulty that transfers of council housing stock to Housing Association status would have on increased demand for DFG.

Department of the Environment, 1996: The first major review of the DFG system in England was completed by Piedad on behalf of the DoE in 1996. Awang’s report comments that the methodology was weak on user consultation and disappointing in respect of identifying how DFGs could be better publicised. Some key findings were:

- The DFG system was reported to have made a valuable contribution to people who needed housing adaptations.
- Drop out rates were high at 35%. The main reasons for this were:
 - works needed not eligible for DFG
 - council tenant works carried out through alternative funding routes
 - Contribution higher than cost of work (therefore nil grant) (34%)
 - Applicant died (13%)
 - Applicant not able to afford contribution (8%)
 - Refusal to complete means test (4%)
 - Reasons unrelated to DFG system (41%)
- DFGs appeared to be well targeted, with 60% going to home owners and 70% going to people aged over 70.
- Problems of delays due to staff shortages (with both Social Services and Housing parts of process)
- Problems arising from the complexity of the process, particularly where both District and County Councils were involved.

Nocon and Pleace, 1998: this work was a collaborative effort of a disability organisation and statutory service providers. It therefore ensured that the views of disabled service users were considered and reported as fully as possible. A key finding from the focus/discussion groups was that experiences were mixed in relation to the adaptation process (although the author placed an emphasis on the difficulties encountered). Negative experiences included the imposition of professional ideas about what might be required, failure to design inclusive facilities, not being involved in the decision making process (“professionals know best”), frustrations in overcoming red tape, and tenure inequities within under resourced services.

O’Brien, 2003: This short report identified families with disabled children who had withdrawn from the DFG system for financial or non financial reasons. The study covered withdrawals during the 2002/2003 year, in 5 out of 11 Northern Ireland Trusts providing community occupational therapist services. The study method was a desk top survey, so as to avoid the concern of raising families expectations about retrospective grant aid. Study limitations were made clear in the work. During the time period concerned,

44 families, with disabled children aged 2-18, withdrew from the system. Reasons reported were unable to afford contribution (30%), ineligible for grant (25%), lack of agreement about nature of adaptations needed (11%), and the remainder other less clear reasons. It was noted that some families receiving partial grant had withdrawn, as well as those receiving nil grant. In total 55% withdrew for financially related reasons, and 45% for non-financial reasons. One of the key areas identified for further research was the outcomes in those cases that did not access DFG.

Oldman and Beresford, 1998: This work focused on parents and disabled children's views and experiences. Research methods included a postal survey- 234 families returned forms (138 from low income groups, and 96 from middle income group). One to two hour interviews were also held with parents, and seven children aged 8 were interviewed using creative methods. Some points made by parents and children included:

- Assessment was stressful and took too long. Advance warning about time-scale was needed
- The majority of attitudes to Occupational Therapists were critical eg. Some families did not like OT suggestions about adaptations needed, especially through floor lifts, stair-lifts and ceiling track hoists as such adaptations exacerbated space problems
- The financial assessment was viewed negatively, especially where no funding was forthcoming
- Constraints on funding, adaptations were not comprehensive and perceived to have been completed in piecemeal fashion and "done on the cheap".

Two main recommendations were made.

- Firstly, an urgent policy review to ensure that children's housing needs could be properly met. There were strong motives for health authorities to help fund adaptations or moving house as sums involved were not excessive, compared with potential health problems in parents, better life chances for children and reduced demand on care services
- Secondly, it was clear that parents wanted professional attitudes to change, supported by specific child related policies and procedures. Professionals such as social workers and paediatricians required greater awareness of disabled children housing issues. Housing staff needed to improve sensitivity to the specific needs of disabled children.

Winfield and Goodman, 2001. This was an in depth study made by the Syniad Benchmarking Centre relating to housing adaptations in Wales, in response to the "Best Value" agenda. Information was collected from 19 of the 22 unitary authorities in Wales. A group met regularly to oversee the work. This comprised representatives from the 19 authorities, plus Disability Wales, Care and Repair Cymru, and representatives from the Welsh Assembly. A series of substantial questionnaires were completed by the 19 local authorities. Mixed quantitative and qualitative data was gathered and reported. A series of good practice guides were also produced, covering the areas of:

- Screening for eligibility criteria and prioritisation for assessment

- Adaptation needs assessment
- Time taken
- Ensuring a quality outcome
- Ensuring an effective communication process

Key recommendations indicated the need for future research into the ageing population as it related to adaptation and equipment needs and consequently resources for service providers. More work was needed on developing a time specified process model, setting out the key stages of the adaptation process against which performance should be measured, and covering all parts of the process including Social Services and Housing processes.

j) In Sight of Home, Meeting the Needs of People with Sight Problems, Linda Rees, 2004

This work was undertaken by RNIB Cymru, supported by the Welsh Assembly Government in 2004. The work has resulted in the production of a detailed Good Practice Guide aimed at Social Services and Housing staff who are involved in the delivery of DFG and adaptation services and are able to influence the delivery of adaptation services to people with sight loss. The Guidance will be supported by comprehensive training of these staff in 2005.

The Guidance has been informed by a comprehensive literature review, questionnaires to all 22 Welsh local authorities, and advice and suggestions from professionals and people with sight loss. One of the most significant findings of this work was that it proved difficult to get worthwhile data regarding DFG and adaptations for people with sight loss. This reinforced RNIB Cymru's already held view that people with sight loss seemed to be missing out on being identified as needing adaptations.

In essence the work represents detailed advice on how the provisions of existing legislation and services for providing DFGs and adaptations should apply equally to people with sight loss, and the specific problems faced by persons with sight loss and how to overcome these.