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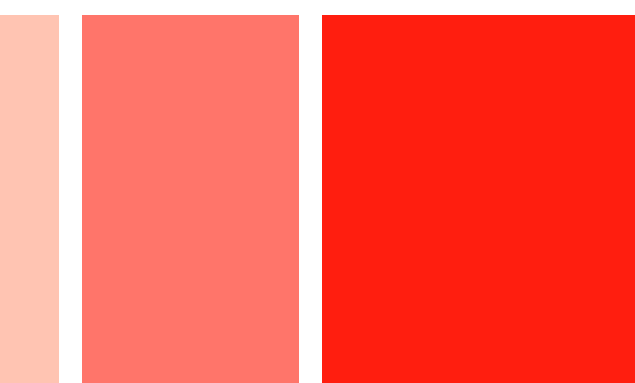


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A Review of Independent Living Adaptations

Executive Summary



A Review of Independent Living Adaptations: Executive Summary

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Views expressed in this report are those of the researchers and not necessarily those of the Welsh Government

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Glossary of terms

DFG	Disabled Facilities Grant
HA	Housing Association
HRA	Housing Revenue Account
ICF	Independent Care Funding
ILA	Independent Living Adaptation
ILG	Independent Living Grant
MAG	Mini Adaptation Grant
OT	Occupational Therapist
PAG	Physical Adaptations Grant
PI	Performance Indicator
RAG	Rapid Adaptation Grant
RRAP	Rapid Response Adaptations Programme
RSL	Registered Social Landlord
LSVT	Large Scale Voluntary Transfer (housing organisation)

Executive Summary

1. In 2014 the Welsh Government commissioned Shelter Cymru to undertake a Review of the provision of independent living adaptations within Wales. This project was commissioned in the light of some £35 million being spent annually by local authorities in Wales on Disabled Facilities Grants (DFGs) and the Welsh Government's own spending of approximately £8 million on Physical Adaptations Grants (PAG) for social tenants.
2. The Review was carried out between May and November 2014 and addressed three aims:
 - Mapping the current system
 - Performance Indicators
 - Testing the feasibility of options for change.
3. The methodology comprised the following:
 - A questionnaire for grant providers which elicited 56 responses covering all 22 local authority areas
 - A wider stakeholders' questionnaire which elicited 14 responses from seven occupational therapists (OTs) and seven other stakeholders from various organisations including local authorities
 - Interviews with 19 key stakeholders and five service users
 - A contextual review of related literature
 - A desktop review of providers' policies and website information
 - Quantitative analysis of individual level data from nine adaptations grant providers
 - Quantitative and qualitative analysis of performance indicator data
 - Four workshops held across Wales with key stakeholders: two in Cardiff (which 41 people attended), one in Aberystwyth (which 16 people attended) and one in Abergele (which 10 people attended).

Mapping the current system

4. The Review identified a fragmented service delivery system with many points of access. There are diverse pathways with a variety of funding streams for different tenures. Funding for adaptations has developed in an ad hoc way in response to wider policy changes, leading to complexity in funding streams as well as eligibility criteria. Although DFG delivery times have improved in recent years there are still unacceptable delays.
5. The PAG, Rapid Response Adaptations Programme (RRAP) and Independent Living Grant (ILG) pathways stood out as simple, quick and effective systems, in stark contrast to the problems associated with the DFG pathway and the complexity of the adaptations system as a whole.
6. Means testing only applies to the DFG; and the existing means test is viewed by many stakeholders as being time consuming, inequitable in relation to other funding

streams and not necessarily cost effective. There is a lack of consistency around what is classified as a minor or major adaptation with different providers offering differing thresholds. There is a tendency for some small-scale adaptations to still be delivered through the DFG process and therefore being subject to means testing and possible delays.

7. There is a paucity of information available to service users about adaptations. The information that is available has an emphasis on older people. Information that is accessible is often complex and inaccessible to people who do not know 'the system'. Service users described difficulties navigating their way through the process and were generally unaware of how the system worked, although most were satisfied with their adaptations.
8. The quantitative analysis, although limited by the availability of suitable data, indicates that the mean cost of an adaptation project is £3,887. The mean time taken to carry out an adaptation is 176 days, with a great deal of variance in this figure.

Performance Indicators

9. The way in which Performance Indicator (PI) information is currently collected is not consistent across the 22 local authorities in Wales, despite clear guidance issued by the Welsh Government. It was suggested by some stakeholders that some local authorities are deliberately ignoring guidance in order to make delivery times look better.
10. The current PI is felt to be too reductive. Positive outcomes are seen as more important to service users than delivery times. There is interest in supplementing data on delivery times with client-focused measures such as customer satisfaction data and/or qualitative information on the impact of adaptations on applicants' lives.
11. Research respondents argued in favour of a single performance reporting regime that included Registered Social Landlords (RSLs) and other agencies as well as local authorities. Although the PI would be measuring different processes it was felt that this would encourage more consistency and more equity between tenures.

Testing options for change

12. A number of key issues emerged during this research:
 - Any systemic change needs to be undertaken with extreme caution due to the vulnerability of many applicants, the scarcity of public funding, and the complexity in the system which increases the risk of unintended consequences.
 - Many stakeholders felt that the level of complexity in the system is unacceptable because it leads to inequality between applicants from different tenures in terms of waiting times and costs, and because it is difficult for service users and providers to navigate. An alternative view was also expressed that this situation is an inevitable reflection of the fact that housing is itself complex and is funded in complex ways. According to this view, the existence of many funding streams is actually beneficial since it relieves pressure across the system, meaning that

at least some people get adaptations delivered relatively quickly, rather than everyone having to wait an equally long length of time.

- There are significant issues with current data collection which prevent a more in-depth understanding of how effective delivery is for different groups.
 - There is debate over whether adaptations should be a universal service, free at the point of delivery with no means test, or whether ability to pay should be taken into account. Existing levels of DFG spending would have a greater impact if money were skewed towards delivering the actual works rather than meeting the costs of administration. The Welsh Government principle of 'progressive universalism'¹ has led to policy initiatives such as free prescriptions and bus passes. Means testing is not generally regarded as compatible with this principle.
 - There is some evidence² suggesting that removing the means test is likely to have at least some impact on demand although the exact extent is unknown. Although there was a broad consensus that at least some level of adaptations should be removed from means testing, the evidence gathered during this Review suggests that there are considerable risks involved in opening up universality too widely, too quickly, at a time of public spending cuts. There is potential for a long-term staged adoption of universal provision.
 - There was strong support for creating a three-tiered approach to adaptations, with minor and potentially mid-level adaptations removed from means testing.
 - There may be potential to review the existing means test and define a new one that addresses some of the criticisms voiced by stakeholders during this study, namely that the test is a blunt tool for assessing need; is overly complex in terms of the calculation; does not take proper account of the costs of living with a disability; and for these reasons ends up preventing some people from accessing adaptations.
13. Based on the qualitative and quantitative research undertaken as part of this Review, three models for change were developed and analysed.
14. Option 1 – 'Status quo' – maintains existing funding streams and delivery agencies, with a strong focus on adopting best practice. This model includes the following:
- All agencies delivering adaptations would ensure that their OT teams are working in the most efficient way possible. All assistant OTs would receive accredited Trusted Assessor training. All agencies delivering adaptations would check procedures against the College of Occupational Therapists' guidance *Minor Adaptations Without Delay* (COT, 2006)
 - Local authorities that do not already have a fully operational Accessible Housing Register in place would work with RSL partners to develop one
 - Local authorities that do not already have a full agency service in place would consider introducing one

¹ Drakeford, M. 'Progressive Universalism', in *Agenda* (Winter 2006) Institute of Welsh Affairs, Cardiff: IWA

² Mackie, P., Bowen, K. and McKeever, B. (2008) *Family experiences of accessing Disabled Facilities Grants: A collaborative research study in Wales and Northern Ireland*, Cardiff: Shelter Cymru

- Local authorities that do not already offer stairlift grants would consider following existing good practice in this area
- Local authorities that do not already have a multi-disciplinary team working on adaptations, with OTs in the same team as Housing, would consider reorganising teams in this way
- Local authorities would revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator
- Welsh Government would refine performance measurement by separately measuring time taken from initial enquiry to assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all delivery agencies. There is also potential for the development of more service user-focused performance measures
- Welsh Government would consider ways of improving the quality of data on adaptations across the system, to assist the development of good policy. Full equality data would be collected across all protected characteristics in a consistent way across Wales
- Welsh Government would look at ways of creating greater accountability and transparency among social landlords for efficient use of adaptations. We suggest that social landlords should be required to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal
- Organisations arranging or providing adaptations would review current information to ensure it is clear and accessible.

15. Option 2 – ‘Unified system’ – merges all existing funding streams into a single pot, to be delivered by a single organisation across all tenures and ages. The model includes the following:

- All adaptations below £1,000 would be delivered via a fast-track system. Local authorities could deliver these directly or work in partnership with agencies such as Care & Repair. No means testing and no OT involvement apart from in exceptional circumstances
- Mid-level adaptations would be defined as those costing more than £1,000 and less than £7-10,000 – precise threshold to be negotiated with local government. These adaptations would be delivered without means testing – or alternatively, would be supported by an ILG-style fund which acts as a triage for urgent cases
- Major adaptations would comprise the most complex. OT involvement would be essential. Again there is potential for an ILG-style fund to triage urgent cases
- In a unified system, Welsh Ministers would work together to establish shared fiscal responsibility between Health and Housing for adaptations, with Health strategically contributing to a single pot of funding
- Local authorities would be encouraged to adopt strong local partnerships similar to the approach demonstrated during the ILG pilot, with health, social care, housing and other relevant agencies represented
- This approach creates the possibility for staged adoption of universality. Funding for lower-level adaptations would be passed to local authorities first, to be distributed outside DFG. This would be followed by funding for mid-level adaptations being passed across in a similar way, and finally funding for complex

adaptations. Funding would need to be hypothecated, with a contingency fund in place

- Alternatively, funding for all adaptations could be passed straight to local authorities, with the means test remaining in place. Social tenants who are not currently means tested would be tested
- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.

16. The financial implications of a unified system are complex. We have identified the following issues:

- DFG funding is currently unhypothecated. If funding for all adaptations was passed to local authorities through General Capital Funding, there is a strong possibility that it would be allocated to other, larger service areas experiencing financial pressures. The risk of reduced resources for adaptations is too significant for unhypothecated funding to be a viable option in the current economic climate.
- Ring-fencing would be extremely difficult to negotiate with local authorities due to a general reaction against this approach. If agreement could be reached over hypothecation, the fund would need to be set at a generous level to avoid the risk of running out mid-year. One potential solution might be for the Welsh Government to retain a contingency fund for local authorities to draw on if budgets run out mid-year.
- Creating a single funding pot would need to be handled sensitively since there is a significant risk of damaging relations between agencies. Identifying the total amount spent on adaptations and top-slicing Social Housing Grant would be a complex exercise, as would working out how to distribute funding.
- Health is a service area with acute internal pressures on budgets, making the prospect of negotiating shared fiscal responsibility challenging.
- Additional funding would be needed to minimise the risk of bottlenecks in the single LA process as well as to account for LSVT adaptations; any ILG-style triage fund; and any higher demand due to removal of the means test.
- Removing the means test for minor and mid-level adaptations raises issues about ensuring resources go to those least able to afford adaptations themselves.
- Giving local authorities sole responsibility for adaptations removes any incentive for social landlords to increase adaptations funding or create discrete pots of funding to meet local identified needs – this could lead to less money going towards adaptations overall.
- Taking responsibility for adaptations away from RSLs would lead to redundancies. Local authorities would need to take on new staff to process higher caseloads.

17. Option 3 – ‘Tiered system’ – retains existing funding streams but with a greater focus on building on elements of best practice as demonstrated by PAG, ILG and RRAP. The emphasis is on streamlining the front end of service delivery in a way which is more equitable for service users, while maintaining a range of funding streams to relieve pressure across the system. The model includes the following:

- All adaptations below the value of £1,000 would be defined as ‘minor’ adaptations, removed from DFG means testing and delivered via a fast-track system. OT involvement would not be needed apart from in exceptional circumstances. RRAP would be expanded to apply across all tenures and ages for all adaptations up to £1,000
- Welsh Government would define a middle band of adaptations. Ideally this middle band should also be delivered without means testing. OT involvement may or may not be necessary depending on circumstances. We recommend that the threshold between mid-level and major adaptations should be set at between £5,000 and £7,000. However the precise threshold would need to be negotiated with local authorities. The aim would be to set a threshold for removing the means test that can be met as far as possible through existing General Capital funding, by offsetting administrative savings against increased applications. This means that the threshold is likely to be lower than in Option 2
- The third band would comprise major adaptations, for which OT involvement would be essential. These adaptations would need to remain means tested until the full implications of removing means testing for lower-cost adaptations are known. In the long term it would be desirable to remove means-testing for this band too
- As with Option 2, this approach creates the possibility for staged adoption of universality, with lower tier(s) being removed from means testing first. Also as with Option 2, removing the means test for minor and mid-level adaptations does raise issues about ensuring resources go to those least able to afford adaptations themselves
- For all tiers where means testing remains in place, an ILG-style fund would be established to act in a triage capacity specifically for urgent cases
- Welsh Government could work with one or more local authority partners to trial the complete removal of the DFG means test
- Welsh Government would work in partnership with local government and, possibly, private sector partners to develop a range of affordable options to assist households to meet their contribution towards the cost of adaptations
- Welsh Government would establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing means test
- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.

Conclusions and recommendations

18. The problems with the current adaptations system have been well documented in successive inquiries and reviews³. The purpose of this Review was not simply to

³ Recent inquiries and reviews in Wales include: the *Social Justice and Regeneration Review* (2004); the *Review of Housing Adaptations Including Disabled Facilities Grants* (2005); The National Assembly for Wales Equality of Opportunity Committee’s *Still Waiting: Home Maintenance and Adaptation Services for Older People in Wales* (2009); CEL Transform’s *Review of Progress in Implementing Recommendations in the Provision of Adaptation Services in Wales* (2010); and the National Assembly Communities, Equality and Local Government Committee’s *Inquiry into Home Adaptations* (2013)

revisit those problems but rather to move the debate to the next stage: if we actually implemented some of the proposed solutions that have been discussed over the years, what would the impacts be?

19. In assessing the impacts of options for change we have noted a certain irony in the fact that the solution which appears on the surface to be the simplest – that is, a move to a unified system – is actually the most complex in terms of the financial implications and levels of risk to service users. Creating a unified system would be a very expensive undertaking and there is little evidence that putting all applicants through one system would result in better outcomes. In fact the qualitative evidence we gathered suggests the opposite: a strong likelihood of longer waiting times and reduced budgets.
20. This research has identified a wide range of proposals that could feasibly create greater consistency and fairness without the problems of pooling budgets. We argue that a ‘one system’ approach to adaptations should be a guiding principle for policy development regardless of who actually delivers the service. This would mean ensuring that, broadly speaking, recipients of adaptation services can expect similar levels of service no matter what their circumstances may be. It would mean encouraging greater consistency in terms of means testing, information provision and waiting times. It would also mean refining data collection to enable comparisons to be made between providers.
21. It is also important to acknowledge where provision has worked well and to build on that good practice. PAG, ILG and RRAP all stood out in the research as responsive, flexible funding streams that were often delivered in a highly person-centred way. It makes little sense to close down funding streams that work well – rather the focus should be on what works and seeking to replicate that across the system. In practice, that means focusing on DFGs as the funding stream with the greatest level of stakeholder concern over delivery times and inconsistencies.
22. This Review identifies the DFG means test itself as the primary source of inequality in the system. There is a debate to be had around the merits of universal provision as opposed to assessing ability to pay, particularly at a time of reduced public funds. However this Review concludes that removing the means test *up to a certain level that is consistent across Wales* is financially possible now, and would make a significant contribution towards achieving equality of outcome.
23. This Review outlines a roadmap towards removing the means test for all adaptations *in the long term*. This needs to be a carefully staged process in order to avoid creating longer waiting times as well as undue pressure on the public purse.
24. This Review recommends that Welsh Government adopt a combination of Options 1 and 3 as follows:

Recommendation 1: Welsh Government should make a commitment to move towards staged adoption of universal provision of adaptations without means testing in the long term.

Recommendation 2: Adaptations provision should be reorganised into a tiered system that is consistent across Wales:

- Minor adaptations up to £1,000
- Mid-level adaptations between £1,000 and £5-7,000 (precise level to be negotiated with local government)
- Major adaptations above £5-7,000.

Recommendation 3: Welsh Government should require local authorities to exempt minor adaptations (defined as those costing £1,000 or less) from means testing.

Recommendation 4: Welsh Government should negotiate with local government the exemption of mid-level adaptations from means testing.

Recommendation 5: Welsh Government should make an ILG-style fund available to triage urgent DFG cases for all tiers where means testing remains in place.

Recommendation 6: The RRAP funding stream currently delivered by Care & Repair Cymru should be expanded to cover all tenures and ages for all adaptations up to £1,000.

Recommendation 7: Welsh Government should work in partnership with local government and other partners to ensure that a range of affordable options to assist households to meet their contribution towards the cost of adaptations are available across Wales in a consistent way. Options might include recyclable loans; equity release; charges on properties; assistance provided by Social Services departments under Section 2(1)(e) of the Chronically Sick and Disabled Persons Act 1970; or Home Improvement Loans.

Recommendation 8: Welsh Government should establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing test.

Recommendation 9: Welsh Government should require social landlords to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal.

Recommendation 10: Welsh Government should consider ways of improving the quality of data on adaptations across the system, to assist the development of good policy. Full equality data should be collected across all protected characteristics in a consistent way across Wales.

Recommendation 11: Welsh Government should refine the adaptations performance indicator by separately measuring time taken from initial enquiry to

assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all delivery agencies. There is also potential for the development of more service user-focused performance measures. Performance indicators should account separately for minor, mid-level and major adaptations.

Recommendation 12: All agencies delivering adaptations should ensure that their Occupational Therapist (OT) teams are working in the most efficient way possible:

- All assistant OTs should receive accredited Trusted Assessor training
- All agencies should check procedures against the College of Occupational Therapists' guidance *Minor Adaptations Without Delay* (COT, 2006) which sets out when Trusted Assessors can be used instead of OTs.

Recommendation 13: All agencies delivering adaptations should review current information provision to ensure it is clear and accessible. Information should meet all protected characteristics under the Equality Act and should be available in a range of languages and formats that reflect the diverse backgrounds of the people of Wales.

Recommendation 14: Local authorities should revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator, from first point of contact, as recommended in current guidance.

Recommendation 15: Local authorities that do not already have a fully operational Accessible Housing Register in place should work with RSL partners to develop one. Serious consideration should be given to ways of including the private rented sector.

Recommendation 16: Local authorities that do not already have a full agency service in place should consider introducing one, to support people through the DFG process as swiftly as possible.

Recommendation 17: Local authorities that do not already offer stairlift grants should consider following existing good practice, by introducing a grant stream that recycles straight stairlifts to be delivered outside DFG.

Recommendation 18: Local authorities that do not already have a multi-disciplinary team working on adaptations, with OTs in the same team as Housing, should consider reorganising teams in this way following existing good practice in Wales.