



Inquiry into home adaptations

Community Housing Cymru response

1. About Us

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

Our objectives are to:

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

Our vision is to be:

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

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

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Introduction

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

CHC response

- **General comments**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Occupational therapists

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

Means testing

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

Working with Care & Repair

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

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

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

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

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

**Community Housing Cymru
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