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Y Grŵp Addysg a Gwasanaethau Cyhoeddus
Education and Public Services Group



Llywodraeth Cymru
Welsh Government

Your Ref:

Nick Ramsay AM
Chair of the Public Accounts Committee

11 June 2018

Dear Mr Ramsay,

**THE PUBLIC ACCOUNTS COMMITTEE INQUIRY 25 JUNE 2018 – HOUSING
ADAPTATIONS**

Ahead of the meeting of the Public Accounts Committee scheduled for 25 June, I am pleased to enclose a paper as requested covering the areas of specific interest as outlined by the Committee.

Yours sincerely

Tracey Burke

WRITTEN EVIDENCE TO THE PUBLIC ACCOUNTS COMMITTEE

HOUSING ADAPTATIONS INQUIRY

A. Introduction

1. We recognise the importance of secure and accessible housing in ensuring the wellbeing of elderly people and other vulnerable groups. We are targeting significant investment at improving the supply of housing designed for individuals and families that have particular health and care needs. We are also committed to a number of programmes to enable vulnerable individuals to remain in their existing homes.
2. Our response to the Housing Adaptations Report recommendations which are explicitly the responsibility of the Welsh Government is covered later in this paper.
3. Before turning to those, we would like to comment on the wider related issues recognising the importance of ensuring that changes to the system involve all those involved in delivery.

B. Wider issues

4. In 2014, we commissioned Shelter Cymru to undertake a review intended to generate an evidence base for system change. The Review of Independent Living and Adaptations, published in 2015, also raised issues regarding complexity and proposed three possible ways forward. The Review noted that the solution, which on the surface, was the simplest – a move to a unified single system – might be the most complex in terms of the financial implications and risks to service users. The document also noted the need to carefully manage a change process in response to its recommendations, recognising the potential for unintended consequences for very vulnerable individuals.
5. We responded positively to the Review at the time of its publication to develop the first step towards a simplified, unified system. The response to the Review was developed by a Steering Group including representatives from Local Authorities, RSLs, Care and Repair, the College of Occupational Therapists, the NHS and social care.
6. 'ENABLE – Support for Independent Living' was introduced in 2016-17. ENABLE aims to make it quicker and easier for people to get help with adaptations when they need it. This approach is designed to enhance the existing arrangements by encouraging greater consistency and monitoring delivery in a standardised format. To support the implementation of the scheme and transitional changes £4 million of additional capital funding was made available to Local Authorities in 2016-2017, with the same amount also available for 2017-18 and 2018-19. Alongside this funding there has been a much stronger focus on integrated action at the local level involving Local Authorities, Local Health Boards, RSLs, and local Care and Repair agencies with the aim of preventing unnecessary admissions to hospital and facilitating earlier discharges.

7. The developments introduced were only ever the first step on a journey. We have now reconstituted the ENABLE Steering Group which will help develop the next step in improving delivery in this area. At the Group's first meeting in March they supported a proposal to undertake a Systems Thinking Review of current services and we are working with the group to develop a specification for the work.
8. We have also begun to analyse the information returned through the improved reporting requirements introduced as part of ENABLE. We expect to be able to publish the analysis of the data that has been collected through this exercise later in the summer. The analysis will provide a clearer picture on the length of time it takes for a range of adaptations to be provided, their costs and any regional variations. It will also inform how the monitoring and collection arrangements can be made more robust and consistent going forward.
9. Means Testing was identified by the Shelter report as a topic that should be re-examined and this was considered by Ministers as part of the implementation of ENABLE. Ministers decided that there should be no means testing for small cost aids and adaptations, but that it should remain in place for higher cost Disabled Facilities Grant adaptations.
10. We also recognise the need to improve the way we use existing adapted homes. The recent Equalities and Human Rights Commission report recommended sharing best practice with a view to moving towards a standardised methodology across all Local Authorities. The Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness 2016, provides guidance on the benefits of adapted housing registers and outlines the Cardiff best practice example. We will work with the ENABLE Steering Group to establish how best practice can be rolled out to other Local Authorities across Wales.
11. Alongside our wider efforts at improving the system for delivering aids and adaptations, Ministers have also been anxious that we should examine the wider issues surrounding the housing needs of an increasing elderly population. In 2015 this led to the establishment of an expert group under the chairmanship of Professor Judith Phillips previously head of the Centre for Innovative Ageing at Swansea University but who is now Deputy Principal (Research) at Stirling University. The report by Professor Phillips group highlighted the importance of strengthening the arrangements which enable elderly people to carry on living independently in their own homes. The expert group also highlighted the importance of widening the housing options available to people as they grow older.
12. In addition to providing adaptations to existing homes, we are also working to 'future proof' new housing which is developed with Welsh Government funding. All social housing in Wales funded via Social Housing Grant is built to the Development Quality Requirements (DQR). The DQR standards apply to new and refurbished housing and cover: space, accessibility, energy efficiency and security. In addition to this, all new social housing meets Lifetime homes standards. This increases flexibility by making homes responsive to the changing needs of the occupants, offering tenants choice and improving accessibility.
13. We are also committed to providing increasing numbers of new homes which respond explicitly to the health and care needs of particular vulnerable groups.

Capital funding has been provided as part of the Integrated Care Fund (ICF) arrangements since 2014. The priority areas for inclusion in the programme are:

- older people with complex needs and long term conditions;
- dementia;
- people with learning disabilities;
- children with complex needs and carers, including young carers.

14. ICF supports schemes and initiatives to promote independence and prevent unnecessary hospital admission, inappropriate admission to residential care and delayed transfers of care. Funding made available through the capital element of ICF has increased to £20 million in 2018-19. Projects funded under the programme are intended to complement the wider NHS and social care integration agenda being pursued via Regional Partnership Boards.

C. Specific recommendations

15. We confirm our acceptance of the recommendations in the Wales Audit Office Housing Adaptations Report explicitly for the Welsh Government. Our response to each recommendation is provided below, alongside anticipated completion date and progress made to date.

Recommendation One

R1 There are many sources of funding and policies for adaptations, which results in disabled and older people receiving very different standards of service (paragraphs 1.5 to 1.9). To address these discrepancies we recommend that the Welsh Government set standards for all adaptations to ensure disabled and older people receive the same standard of service irrespective of where they live, who their landlord is and whether they own their own home.

Response: Accept

Completion Date: December 2019

As part of the ENABLE programme of work, Welsh Government has begun collecting and aggregating data to help understand how adaptations are currently delivered. Using this data we will work with delivery organisations to improve the service the aids and adaptations programme provides to citizens. During the next twelve months we will work with our partners across a range of tenures to identify those aspects of this work which could benefit most from agreed service standards as well as agreeing what those standards might be.

Recommendation Five

R5 Delivery of adaptations can be delayed by a variety of factors (paragraphs 2.20 to 2.33). To improve timeliness in delivery we recommend that:

- *the Welsh Government reviews whether local authorities should continue to use the means test for Disabled Facilities Grants (DFGs);*
- *local authorities provide or use home improvement agency services to support disabled and older people to progress their DFG applications efficiently;*

- *delivery organisations work with planning authorities to fast track and streamline adaptations that require approvals;*
- *delivery organisations use Trusted Assessors to undertake less complex adaptation assessments; and*
- *the Welsh Government streamlines its approval processes for Physical Adaptation Grants (PAGs).*

Response: Accept

Completion Date: April 2019

We will review whether the means testing requirements for Disabled Facilities Grants should continue. We will also work with the sector to identify practical changes which would enable us to streamline the approval process for Physical Adaptation Grants.

Recommendation Nine

R9 Having the right performance indicators and regularly reporting performance against these are important for public bodies to manage operational performance, identify areas of improvement and evaluating the positive impact of services. We found that the current range of performance indicator data is extremely limited and not sufficient to enable a full evaluation of performance (paragraphs 4.5 to 4.20). To effectively manage performance and be able to judge the impact of adaptations, we recommend that the Welsh Government and delivery organisations:

- *set appropriate measures to judge both the effectiveness and efficiency of the different systems for delivering adaptations and the impact on wellbeing and independence of those who receive adaptations;*
- *ensure delivery organisations report against their responsibilities in respect of the Equalities Act 2010;*
- *ensure performance information captures the work of all delivery organisations local authorities, housing associations and Care and Repair agencies; and;*
- *annually publish performance for all delivery organisations to enable a whole systems view of delivery and impact to support improvement to be taken.*

Response: Accept

Completion Date: December 2019

Data collected under ENABLE over recent months has begun to provide us with a more comprehensive picture of the scale and nature of the investment being made in adaptations and how this varies from one area to the next. We are hoping to make early progress towards being able to collate the data now available including the publication of an annual snapshot of performance.

We recognise this recommendation sets a more stretching challenge to develop a greater understanding of the impact of these interventions. We are currently assessing the level of performance information that will be available to publish by the end of 2019 on the 2018-19 investment. We will also ensure our improvement work includes measures designed to remind organisations of their responsibilities in respect of the Equalities Act 2010.

D. Future Working

16. Our work to bring further improvements in this area will continue to involve all of the organisations that have a part to play in improving the support available to enable people to live independently in their homes.
17. Moving forward, our intention is that the work underway to provide closer joint working on the delivery of aids and adaptations should become part of the wider efforts to integrate housing services even more closely alongside the NHS and social care. The Review of Health and Social Care in Wales published in January 2018 sets out a range of far-reaching actions in terms of service improvement.
18. At the time of writing this evidence paper, the Welsh Government is preparing its response to the Parliamentary Review, but it is clear that implementing the recommendations would undoubtedly require even closer working between housing providers and health and care services, with housing considerations more fully aligned with health and care planning at local level.
19. This Report by the Wales Audit Office and the Public Accounts Committee's scrutiny is, therefore, a timely, important and welcome contribution to help drive change in this area. We hope that this paper has provided a useful starting point for discussion later this month.

Welsh Government
June 2018