



Purpose – to provide evidence for the National Assembly for Wales Communities, Equality and Local Government Inquiry into Home Adaptations.

1. Disability Wales is the national association of disabled people's organisations in Wales. Disability Wales strives to achieve rights, equality and independence for all disabled people, regardless of physical, sensory or neurological impairment, learning difficulty or mental health condition. We recognise that many disabled people have different identities and can face multiple discrimination.
2. **Why there are still significant variations in the time it takes to deliver aids and adaptations funded by Disabled Facilities Grants across Wales;**
3. There is no uniform guidance to the administration process and differing funding priorities could be the reason for timescale variation across Wales. Each Local Authority has its own funding priorities and there isn't joined up networking across Local Authorities. A joined up approach would prove very beneficial to Authorities and disabled people as information and guidance would be standardised throughout Wales. Also the coordination of Occupational Therapists to carry out the initial assessment of need along with Social Services often varies according to the Local Health Board / Authority they are attached to. Again each Health Board allocates their funds according to their own priorities; there is no standard across Wales. Therefore; neither assessments nor the application process for Disabled Facilities Grants (DFGs) are a smooth process.

4. **Whether sufficient progress has been made on implementing recommendations from the Equality of Opportunity Committee's 2009 report on home adaptations¹;**
5. Disability Wales cannot comment on all the recommendations however we will be able to comment on two. Although throughout the 15 recommendations focus is very much on older people, the benefits of adaptable housing for disabled people are not mentioned at all.
6. **Recommendation 8** – The feasibility of having one single, publically available housing register across all tenures. In relation to Accessible Housing Registers (AHRs) this is yet to materialise, in fact Shelter Cymru's Accessible Housing Registers research found that some Local Authority staff were adversely opposed to advertising their AHRs more widely due to the fear of being swamped by disabled people applying for accessible housing.
7. There is also no standard AHR, Local Authorities could be divided as to whether to integrate AHRs into the conventional choice base system (already in place) or have a separate standalone AHR. It is possible to have both in existence across different Local Authority areas but at the same time employ a joined up approach. The preferred Housing Register choice of each Local Authority and their flexibility of approach will determine the feasibility of a national AHR for the whole of Wales. At the moment, Welsh Government are at the research stage, it is hoped that once the research findings have been digested, a future course of action can then be identified to further strengthen the developments of AHRs across Wales.
8. **Recommendation 9** – although this applied to older people only, disabled people too require information about home maintenance and adapted services available. Information must be provided in accessible formats, in the most accessible way e.g. large print, Easy read, Braille, British Sign Language. Disabled people may need one to one support / advocacy while submitting DFGs also.
9. The dissemination of information is also important to consider, not all disabled people use the Internet therefore placing flyers in places where

¹<http://www.assemblywales.org/bus-home/bus-third-assembly/bus-guide-docs-pub/bus-business-documents/bus-business-documents-doc-laid.htm?act=dis&id=137714&ds=7/2009>

disabled people frequent would be a good starting point. Information in alternative formats still has to be requested by disabled individuals / groups; it would be better if information could be provided in accessible format without having to request it. There is more to accessible formats than large print versions of documents. If you provide information in electronic format you must be aware of access requirements; PDF documents are not always screen reader compatible for example. Will information be provided through active engagement, involving local disabled groups by way of workshops / steering groups' participation or similar? Active engagement is positive as it would enable disabled people to share their knowledge and experience and also to enable disabled groups to assist other disabled people in their local community with housing related issues.

10. What impact reduced resources for housing are likely to have on the provision of home adaptations;

11. Reduced resources could have a detrimental effect of home adaptations. There is already a considerable variation of grant administration waiting times across Local Authorities in Wales. The waiting times could increase due to fewer staff being able to carry out the eligibility assessments. The amount of Grants available (i.e. the funding pot) could diminish which could inevitably lead to increasing competition for limited resources available to disabled and older people in need of adaptation grants.
12. Long term funding of the DFG scheme could be put in jeopardy if priorities and practicalities of delivering a reduced grant / budget are not adequately thought through. It is likely in the worst case scenario that it could come down to Older people vs. Disabled people for the DFG funds? Eligibility criteria could become more stringent as a result of the reduction of resources and assessments more complicated due to increased competition for the reduced funds as mentioned in the previous paragraph.
13. Who should monitor the quality of home adaptations? Reduced funds could mean the adaptations are carried out by the builder who provided the cheapest tender and not necessarily the best quality tender for example. Quality assurance of work carried out should be monitored and current high standards maintained regardless of reduced resources.

Disabled people could receive poor quality adaptations which could lead to costly repairs and upkeep, thus increasing disabled peoples stress levels and the extra work required could add to the cost hence diminishing the budget further.

- 14. Is the Welsh Government effectively monitoring the provision of adaptation services;**
15. We are aware that the Welsh Government worked with Shelter to report on the prevalence and benefits of AHRs which we welcome as AHRs are something Disability Wales researched in 2009. For information about Disability Wales 2009 research see:
<http://www.disabilitywales.org/accessible-housing>.
16. Adapted and Accessible Housing forms an integral part of the Framework for Action on Independent Living (which underwent a draft consultation stage before Christmas. See:
<http://wales.gov.uk/consultations/equality/frameworkforactionconsultation/?lang=en>) (Responses are being analysed currently). Accessible housing is one of the priority areas and of paramount importance when disabled people want to live inclusively in the community. Availability of accessible homes gives disabled people a housing choice, the location of accessible housing such as near public transport links and local amenities should also be a factor to consider in keeping with an overall holistic approach to independent living. See also Disability Wales' Independent Living Campaign and Manifesto (forerunner of the Framework for Action on Independent Living <http://www.disabilitywales.org/independent-living>) which again highlighted the significance of accessible housing in relation to successful Independent Living.
- 17. What more needs to be done to improve home adaptation services in Wales.**
18. Increased provision of funds and support for the roll out of AHRs across Wales or a choice based joint approach between all Local Authorities and Housing providers. This is needed in order to ensure disabled people have accessible housing that meets the ever increasing demand.
19. Housing Adaptation services could become increasingly vital as other forms of disabled peoples' welfare benefits and social service provisions

are reduced. The lack of other means of funding could lead to an increase in DFG applications as an increasing numbers of disabled people try to avoid becoming prisoners in their own home. This would result in an increased workload for Housing Adaptation Teams.

20. Ensure the administration of DFGs are standardised across Wales; perhaps Welsh Government could set a maximum waiting time for the Grants to be processed through; a 'Good Practice' Guide for Local Authorities to follow when decision making to ensure consistent decisions are made.
21. More could be done to promote the adaptation service as a viable alternative to residential care or the alternative to moving to a different home if the current house does not meet the occupants' accessibility requirements. Of course with any promotion drive it must be ensured that the target groups identified can have easy access to the information (accessible formats etc).
22. To illustrate the issues facing disabled people a Disability Wales member commented:
23. *"More than a year ago I had my application turned down by my county council for a full DFG on the grounds that I had had a DFG 22 years ago. It was concerned with adaptations to my bathroom which has become unusable because the shower base put in at the time has cracked and water is seeping into the floorboards. I have been told that a shower base like the one I have should never have been installed. Although it is wheelchair accessible it is a type of plastic which has deteriorated over time. This was paid for through a DFG 22 years ago and the LA says they will not provide a grant for works previously carried out."*
24. To conclude: Provision of home adaptations can make a really positive difference to disabled peoples lives and promotes disabled peoples' right to independent living. Applying for DFGs, for example, could be a smoother process. Consistency across all Local Authorities on issues such as eligibility, assessment and waiting list times etc would go a long way to simplify the grant application process. It is hoped that homogeny of the Housing Adaptation service across Wales could lead to a fairer, more transparent and better quality service with more accountability.