Paper 3

Communities, Equality and Local Government Committee

Inquiry into Home Adaptations
Response from : Tai Pawb

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Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's mission is, "To promote equality and social justice in housing in Wales". It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

What we do

Tai Pawb works closely with the Welsh Assembly Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services.

Tai Pawb's vision is to be:

The primary driver in the promotion of equality and diversity in housing, leading to the reduction of prejudice and disadvantage, as well as changing lives for the better.

A valued partner who supports housing providers and services to recognise, respect and respond appropriately to the diversity of housing needs and characteristics of people living in Wales, including those who are vulnerable and marginalised.

For further information visit: www.taipawb.org

Charity registration no. 1110078
Company No. 5282554

Introduction

As a membership body for social housing providers across Wales we welcome the opportunity to respond to the National Assembly for Wales' Communities, Equality and Local Government Committee inquiry into housing adaptations. We further welcome the opportunity to submit oral evidence to the inquiry in March 2013, during our oral evidence we will provide further detailed feedback from our membership once it has been forwarded to us.

General Comments.

1. There are currently several routes for an individual to access funding to help with the cost of adapting their home to enable a greater independence in their daily lives. The route into funding is both complex for the individual and creates inequalities dependent on:

- tenure type
- age
- income / means tested approach

2. Additionally there is concerning anecdotal evidence that refusal of adaptations is being used as a housing management tool to tackle some of the perceived problems associated with under occupancy. It is unclear if all tenants who request adaptations for their property and who are under occupying are refused on the grounds of occupation level or if only those who are receipt of housing benefit are being denied access to these services. It is further unclear what knowledge there is of suitable accessible or adaptable housing being available for these individuals or what consideration, if any, is being given to the impact this has on community cohesion and individual support networks. This is an area which Tai Pawb is seeking more information on and hopes to be able to present this to the inquiry during their oral evidence in March 2013.

Why there are still significant variations in the time it takes to deliver aids and adaptations funded by Disabled Facilities Grants across Wales

3. Some variation is to be expected in the delivery time for Disabled Facilities Grants on a regional basis across Wales. These will be associated with local capacity difficulties and challenges, population demographics and, the housing stock itself and also the typography of the area. Furthermore local variances in the administration processes of the Disabled Facilities Grant may also account for some of the disparities between Local Authority areas and the completion of work through a disabled Faculties Grant. This is somewhat inevitable in a complex system where there can be a large disparity between the types of adaptations requested in one local authority area in comparison with another. As a DFG is a means tested grant there may be significant delays associated with some disabled people having to secure finances to cover their contribution towards the cost of the grant also.

4. Currently the DFG is the only adaptation process which has a Performance Indicator associated with it, but this PI does not distinguish between the *type* and *complexities* of the adaptation being provided and simply considers the waiting time. However the separation of PIs for adaptations which were provided for children and adults does allow for a low level comparator to exist between adaptation types. Whilst it may be possible to consider comparator waiting times for DFGs across local authority areas, there are significant data challenges which need to be addressed to ensure there is an accurate like for like comparison being made. Additionally it is not possible to compare variances between DFG processes and other funding routes such as PAG, RRAP and Independent Living Grants as there are not PI associated with these forms of funding.

5. Additionally the PIs which is used for DFGs does not take into consideration that the process has distinct processes within the grant which need to be completed in a particular order. The PI does not allow for accurate recording at what stage during the grant process a wait is generated. Thus it is difficult to use the PI to improve service delivery or to enable accurate like for like comparisons either within a local authority area or across boundaries. For example a delay may occur due to waiting for access to an Occupational Therapist Assessment as the service user has be assessed as a low priority using Fair Access to Care Services (FACS) criteria this is included in the PI for the DFG as it is part of the time taken to get a solution to the problems being faced by the service user. However the wait occurred outside of the DFG process as it is only after the assessment has been completed and a DFG has be identified as a solution that any progress can be made on the applications. Some local authorities will fast track DFG referrals but it is not always clear on the application if this is the basis for the application for assessment; the concern with prioritising on these grounds rather than need is that those who are in significant need may face unacceptable delays in service provision as capacity is being used by DFG applications.

Whether sufficient progress has been made on the implementation recommendations from the Equality of Opportunity Committee's 2009 report on home adaptations

6. According to the response from the College of Occupational Therapists to our inquires there have been significant improvements in service design and delivery in light of the 2009 report by the Equality of Opportunity Committee

7. Recommendation 9– the Older Persons Commissioner, Age Cymru, Care and Repair and the College of Occupational Therapists work together to produce a information leaflet to help older people better understand the options available to them when considering the need to adapt their home.

8. Tai Pawb would like to see this approach extended to all people across Wales and an accessible information leaflet to be produced to help disabled people and their

families and carers to understand the complexities of the housing adaptation system. In the light of the increased reliance on the private rented sector within Wales and the proposed tenancy reform this is a minimum step which should be considered by Welsh Government.

9. Recommendation 10 Whilst there has been some work undertaken by the college of occupational therapists, some work with housing organisations and continuing care providers in Wales and Tai Pawb has a voice on the All Wales Posture and Mobility Board there is more work to be done in this area. There are significant improvements which could be made by closer working between health and housing in Wales; this includes better and more robust links with discharge nurses in rehabilitation units as a minimum. A recent (English) report highlighted the unacceptable levels of young people with an acquired spinal injury who were placed into older persons (non specialist) care homes as they were unable to return to their home to do accessibility difficulties (Aspire Report http://www.aspire.org.uk/Data/Sites/1/media/what-we-do/carehomeresearch/carehomeresearchreport.pdf)

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

10. There are significant challenges currently facing the social housing sector in Wales, in part as unprecedented changes in welfare provision take hold. Welsh Government continues to support the use and establishment of Accessible Housing Services in Wales (Framework for Action on Independent Living) however the unintended consequence of housing benefit reform and under occupation changes make mean that the efficiency of such services is called into question. Previously Accessible Housing Services have operated on a best match or best fit approach which could result in under occupancy. In effect the primary driver had been to provide the disabled person with a property which best match their access needs in terms of adaptations. This approach ensured that the disabled person was housed in a property which matched their needs whilst ensuring that adaptations did not go to waste or where not being removed at additional cost to the tax payer. Whilst housing management would also be to try to avoid under occupancy; where this was not possible it was thought to be more efficient to allow under occupation and reuse of adaptation rather than removal of adaptations possible new grant funded adaptations being utilised in a smaller property where under occupation did not exist. This not allow ensured efficiency within the housing and grants system were maintained but for the service user it facilitated moving to suitable properties in a more timely manner. With the introduction of under occupation charges it is unclear how the system will continue to work. There is a real danger that adaptation will begin once again to be removed from properties where appropriate sized disabled households cannot be found allowing old inefficiencies to creep back into the system.

11. Tai Pawb has further concerns related to permissible services charges. Previously some housing providers in Wales had accounted for maintenance contracts and general up keep of adaptations within a housing benefit claim. This, under the new rules, is no longer allowed. There is concern that people in need of adaptation will not apply to have these completed as they are fearful of the additional costs they will incur due to annual maintenance charges associated with the adaptations. This is also a concern highlighted by our members.

Is the Welsh Government effectively monitoring the provision of adaptation services?

12. As indicated in our response to previous questions there is much more scope for appropriate and accurate monitoring and PIs across all grant schemes in Wales. There is no systematic equality monitoring data which is collected using a standard format used by all grant administering bodies / agencies. This means that there is no systematic way of ensuring equity of access to grant funding streams in Wales for any of the protected characteristics. Therefore satisfaction in service delivery cannot be assessed either on a regional basis or used for whole service comparators in relation to any of the protected characteristics.

What needs to be done to improve home adaptations services in Wales

13. There are several key areas for consideration to improve home adaptation services in Wales these are briefly listed below and we welcome the opportunity to expand on these during our oral evidence in March 2013:

- Clear and careful consideration to reduce the complexities within the funding routes for housing adaptations
- Consideration of a tenure 'blind' approach to housing adaptation grant funding in Wales
- Appropriate mitigating actions to be considered and implemented to help ensure that resources are not wasted as a direct result of under occupancy rules for housing benefit claimants.
- Consideration of the appropriateness and disparities which are created by the DFG process being means tested and the PAG and Independent Living Grant being non- means tested.
- If means testing is to remain a propitiate approach to means testing is utilised, that additional options are made available for all people in Wales such as a low cost loan.
- No disabled person in Wales should be forced to live in a non-adapted home due to the inability to afford a contribution towards a means tested grant.
- Consideration should be given to the wider impact of enabling a disabled person to remain in either a privately rented home or a home they own, in terms that the alternative for them is to try to access social housing through a housing association where any adaptation needs would not be means tested. In a system where there currently is a lack of accessible housing the abolition

of a means tested DFG should be considered in the light of the alternative which could be this person trying to be rehomed the oversubscribed social housing sector.

- Help to mitigate the disproportionately negative impact associated with DFG means testing and younger people.
- If one grant administering body is to be used in Wales Welsh Government needs to ensure that this body is properly funded and adequate resourced. Furthermore Welsh Government will need to ensure that any such body has the expertise to work with people who may identify themselves as possessing any of the protected characteristics listed the Equality Act 2010, and to ensure that all aspects of service delivery and design are monitored in relation to this.
- Better use of Occupational Therapist resources including the possibility of OTs dedicated to housing as shared resources jointly funded by Las, Housing Associations and LSVTs.