

Welsh Government Written Response to the Communities, Equality and Local Government Committee's Report on its Inquiry into Home Adaptations by Carl Sargeant AM, Minister for Housing and Regeneration

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The housing needs of older and disabled people have long been and remain a priority for the Welsh Government, which is why we announced a review of adaptations services in the Welsh Government White Paper *Homes for Wales: A White Paper for Better Lives and Communities*. The Committee's report is therefore timely and will inform further policy development in this large and diverse area of housing.

The needs of older and disabled people are indeed many and varied, no more so than in the field of home adaptations. The stark demographics of an ageing population are well known, with older people living longer and wishing to remain independent in their own homes. It is therefore important for the right policies and infrastructures to be in place to ensure that services are delivered effectively, consistently and in accordance with the wishes of older and disabled people and their carers and families.

Whilst there has been significant progress and improvement in the policy area of home adaptations over the last few years, the Committee has rightly highlighted a number of areas where further improvements can be made. My review will try and address as many of the issues that the Committee has raised so that further improvements can be made to the current arrangements for home adaptations.

Crucial to the success of the home adaptations service is corporate working across departments within local authorities and between local authorities. The Committee is quite right to highlight this. This is a message that is contained within the Welsh Government's guidance on delivering Disabled Facilities Grants and it has also feature in previous reviews of adaptations services. However, its importance needs to be reinforced.

The Committee has done older and disabled people a valuable service by producing this report. It provides a significant body of evidence for the Welsh Government to consider in the context of its own review into home adaptations. I thank the Committee for its diligence and commitment in producing this piece of work.

I set out below my response to the report's individual recommendations.

Detailed responses to the report's recommendations are set out below:

The Committee recommends that:

- 1. The Welsh Government should report back to this Committee on an annual basis on progress against the recommendations in this report and on improving the adaptations system generally.**

Response: Accept in principle

I accept this recommendation in principle. In line with our commitment in the Housing White Paper, we are undertaking our own review of adaptation services. I will inform the Committee of our findings. However, annual reporting may not achieve what the Committee is proposing as there will be periods when there will be little or nothing substantive to report.

Financial implications

This will be for the Welsh Government to consider. Any additional costs will be met out of existing programme budgets.

- 2. The Welsh Government should, in conjunction with local government and social housing providers, set out what it believes are appropriate standards of delivery times and should ensure that all local authorities meet that standard.**

Response: Reject

Statutory timescales are already contained within existing legislation governing the provision of adaptations. That said, the purpose of further work by the Welsh Government is to ensure consistency good services and standards in all areas.

Financial implications

None.

- 3. The Welsh Government should continue to keep under review the impact of welfare reform on social housing. In so doing, the Welsh Government should remind local authorities to make appropriate use of discretionary housing payments to help tenants living in adapted housing, and to have regard to guidance on this from the Department for Work and Pensions.**

Response: Accept

The Welsh Government will continue to monitor the impact of welfare reform on all aspects of housing as it has done to date. Local authorities will be reminded of their abilities to make discretionary housing payments.

Financial implications

This will be for the Welsh Government to consider. Any additional costs will be met out of existing programme budgets.

- 4. The Welsh Government should engage with the WLGA, CHC, Care and Repair and Occupational Therapists to explore the possibility of introducing a single point of entry to the system within each local authority area, where such arrangements are not already in place.**

Response: Accept

We are already doing this in the context of the review of adaptations services that we are planning to undertake. Current guidance also makes it clear that a single point of entry into the system and a single point of contact for customers is vital.

Financial implications

Likely to be limited and for the Welsh Government to consider. Any additional costs will be met out of existing programme budgets.

- 5. The Welsh Government should ensure that adequate information is available on the various aspects of the adaptations system. This should include information clarifying the role and rights of clients in relation to adaptations delivered under DFGs.**

Response: Accept

A comprehensive leaflet has already been produced by Care & Repair Cymru, Age Cymru and the College of Occupational Therapists.

Financial implications

None as the leaflet is already widely available.

- 6. The Welsh Government should extend and promote more actively the fast-track process for small scale adaptations delivered under DFGs.**

Response: Accept

We have actively done this in the past and will continue to do so. Existing guidance, which was revised following the review of adaptations in 2005, makes it quite clear that small scale adaptations should not be carried out through the Disabled Facilities Grants system.

Financial implications

None at this stage.

- 7. The Welsh Government should explore the possibility of making the Rapid Response Adaptations Programme available across all ages and tenures, and undertake analysis of the financial implications of such an approach.**

Response: Accept in principle

We have already considered this and will be looking at the issue further in the context of our review of adaptations. My predecessor also had talks with the Minister for Health and Social Services on this very issue and I am keen to continue that dialogue in the near future.

Financial implications

There will be financial implications associated with extending the Rapid Response Adaptations Programme to other tenures and these will primarily have to be met out of existing programme budgets.

- 8. The Welsh Government should ensure that guidance for local authorities is clear on when an adaptation should be delivered via a DFG. The guidance should indicate that DFGs should be used only when it is the most effective and efficient way of delivering an adaptation.**

Response: Accept

Current guidance for local authorities make it quite clear that smaller scale adaptations should not be carried out through the DFG system. See comment above.

Financial implications

None at this stage.

- 9. The Welsh Government should require each local authority, working with registered social landlords, to produce a customer charter, setting out its commitments to the residents of that area in relation to adaptations services.**

Response: Reject

I consider this to be overly bureaucratic and burdensome on local authorities and registered social landlords at a time of considerable pressure on financial and staffing resources. For these reasons I cannot accept this recommendation.

Financial implications

None. This recommendation is being rejected.

- 10. The Welsh Government should encourage local authorities that have not already done so to move to an agency approach for DFGs as a model of good practice.**

Response: Accept in principle

Where it is appropriate we will continue to encourage local authorities to adopt an agency approach to DFG delivery in partnership with the WLGA and the all-Wales Heads of Environmental Health Technical Panel.

Financial implications

There will be no additional financial implications for the Welsh Government in relation to this recommendation.

- 11. The Welsh Government should require local authorities to put in place a designated senior officer to take a corporate lead on adaptations.**

Response: Accept in principle

We can envisage this but it would be difficult for the Welsh Government to impose a duty on local authorities to do it. Such a requirement could constitute a new burden and would consequently require additional funding. Our guidance covering DFGs emphasises a corporate approach to the delivery of adaptations and we will discuss this with the WLGA and the all-Wales Heads of Environmental Health Technical Panel. A local authority scrutiny committee could also consider the approach taken locally to deliver effective and efficient services by the local authority in conjunction with Registered Social Landlords and other organisations.

Financial implications

No additional financial implications for the Welsh Government at this stage.

- 12. The Welsh Government should encourage local authority scrutiny committees to scrutinise the performance of adaptation services in their areas at least once in a council term.**

Response: Accept

The Welsh Government will encourage local scrutiny committees to do this. There may also be a role for Local Service Boards in implementing this recommendation.

Financial implications

This will be for the Welsh Government to consider. Any additional costs will be met out of existing programme budgets.

13. The Welsh Government should conduct an audit of adaptations services to identify best practice and the extent to which it is being implemented across local authorities and report back to the Committee on its findings.

Response: Reject

It is not for the Welsh Government to intervene in such a manner. Responsibility for the delivery and administration of adaptations services is a matter for local authorities, registered social landlords and their strategic partners to consider. Current guidance relating to DFGs identifies a range of good practice and includes anonymised examples of locally developed solutions to problems.

Financial implications

This recommendation is being rejected, therefore, there are no additional financial implications for the Welsh Government.

14. The Welsh Government should work with the WLGA and other stakeholders to introduce performance monitoring arrangements for all adaptations services across all tenures, including DFGs, and should ensure that they are accurate and transparent. Performance monitoring arrangements should include:

- **the time taken from initial inquiry to provision of an OT assessment;**
- **the time taken to provide an appropriate housing solution, including information on the mechanism under which that solution was delivered (for example by DFG, Rapid Response or rehousing); and**
- **the time taken to undertake an adaptation/DFG over a range of costs.**

Response: Reject

We have looked at additional Performance Monitoring in the past and the trend is to reduce the number of performance indicators not increase them. There are questions around consistency in terms of the current data that is submitted by local authorities and we will be considering performance reporting in our review. However, the guidance that accompanies the current Performance Indicator is quite clear on what information should be submitted.

Financial implications

There are no additional financial implications for the Welsh Government associated with this recommendation as it is being rejected.

15. The Welsh Government should issue clear and detailed guidance on the new performance indicator so that it is interpreted and reported consistently.

Response: Accept in principle

Current guidance on PSR/004 relating to the delivery of DFGs is extremely clear on what is required from local authorities. I shared the guidance with the Committee during its inquiry and made this very point during my evidence session.

Financial implications

There are no additional financial implications for the Welsh Government in relation to this recommendation. Comprehensive guidance on the current PI already exists.

16. The Welsh Government should ensure that, as a model of good practice, mechanisms are put in place in local authorities to monitor customer satisfaction and longer term outcomes, including delivery and quality of work. We expect customer satisfaction to be monitored throughout the process. We expect mechanisms to be introduced so that the quality of work can be independently monitored.

Response: Accept in principle

Monitoring satisfaction levels for services and evaluating longer-term outcomes is important. Local authorities regularly undertake customer satisfaction surveys in order for their services to be improved. Care & Repair Cymru and Care & Repair agencies also gauge the views of clients where services are provided and the information is held centrally. Registered social landlords also survey their tenants to ascertain whether they are satisfied with their accommodation and the any services that have been provided. Quality of work is assessed before it is signed off and classed as being completed. The Welsh Government is committed to identifying and spreading good practice.

Financial implications

As this work is already ongoing there are no additional financial implications for the Welsh Government.

17. The Welsh Government should explore whether contributions from health and social care budgets to home adaptations are appropriate, so as to improve outcomes for patients.

Response: Accept

My predecessor has already had talks with the then Minister for Health and Social Services on this very issue and I am keen to continue that dialogue in the near future with the new Health Minister. Discussions have also taken place at official level on the same issue. It is well documented that adaptations represent large cost-savings for the health service in terms of hospital admission and discharge and admission to longer term care.

Financial implications

There may be financial implications for health budgets if a proportion of funding is redirected by the Welsh Government for housing adaptations purposes. These would need to be met out of existing budget provision.

18. The Welsh Government should conduct a cost-benefit analysis of the means test and report back to this Committee on its conclusions.

Response: Accept in principle

We will be looking at the means test in the context of the review of adaptations that was announced in the Housing White Paper. Our deliberations might not specifically include a cost-benefit analysis but we will be considering the means test very carefully to see if there is any scope for changes to be made to the current arrangements.

Financial implications

If the means-test for DFGs was amended then there would be financial implications for the Welsh Government and for local authorities. Spending on DFGs by local authorities currently comes out of local authority General Capital Funding and additional costs would have to be absorbed within that budget line.

19. The Welsh Government should continue to fund and explore the possibility of extending the independent living grant programme.

Response: Accept in principle

The Independent Living Grant programme helped many people to continue to live in their own homes as comfortably and safely as possible. The findings of its evaluation will be considered in our review. The extension of the programme will depend on the outcome of our review of adaptations and the availability of additional capital funding. It may be the case that the review recommends that all minor adaptations are undertaken outside the current DFG system. This would mean that there may no longer be any need to have independent living grant and the current system would be simplified.

Financial implications

There may be additional financial implications for the Welsh Government if the independent living grant programme was extended.

20. The Welsh Government should ensure that all LSVTs have made adequate provision for housing adaptations in their business plans.

Response: Accept in principle

Guidance issued by the Welsh Government (Housing Transfer Guidelines) makes it clear that all prospective Large Scale Voluntary Transfers should make adequate provision for adaptations in their business plans from the outset of the stock transfer process. This point was reinforced in 2009 when the Housing Directorate wrote out to all prospective LSVTs to remind them to ensure that realistic financial assumptions should be provided for adaptations to their stock in their business plans. We will continue to make sure that any new LSVTs established in the future, are aware of this.

Financial implications

Any cost implications for the Welsh Government in association with this recommendation will be minimal and will be met out of existing programme budgets.

21. The Welsh Government should explore how Invest to Save funding can be used by local authorities and local health boards for adaptations.

Response: Accept in principle

I am keen to discuss this with the new Health Minister. Discussions have already taken place at official level on the same issue. It is well documented that adaptations represent large cost-savings for the health service in terms of hospital admission and discharge and admission to longer term care.

Financial implications

There may be financial implications for health budgets if a proportion of funding is redirected by the Welsh Government for housing adaptations purposes from the invest to save budget. These would need to be met out of existing budget provision.

22. The Welsh Government should make housing registers a statutory requirement. This should include all social housing. The Government should also explore how the forthcoming Housing Bill can be used to include private rented accommodation on such registers.

Response: Accept in principle

Most local authorities have adapted housing registers that cover social housing. Guidance issued by the Welsh Government on social housing allocations policy also makes it clear that tenants should be matched against stock that has already been adapted if it is acceptable and practical to do so. The Housing Bill will be introduced in the coming months and it is not possible to include measures covering adapted private rented sector stock at this stage.

Financial implications

There are no additional financial implications for the Welsh Government in relation to this recommendation as it is being accepted in principle.

23. The Welsh Government should work with the various agencies involved in the adaptations process to ensure that opportunities to recycle equipment are maximised.

Response: Accept

A significant number of local authorities work corporately to maximise the amount of equipment that is recycled where it is safe and practical to do so. There are also specific social services initiatives that cover the storage and the recycling of equipment. We will encourage this.

Financial implications

Any additional financial implications for the Welsh Government associated with this recommendation will be met out of existing programme budgets.

Carl Sargeant AM
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