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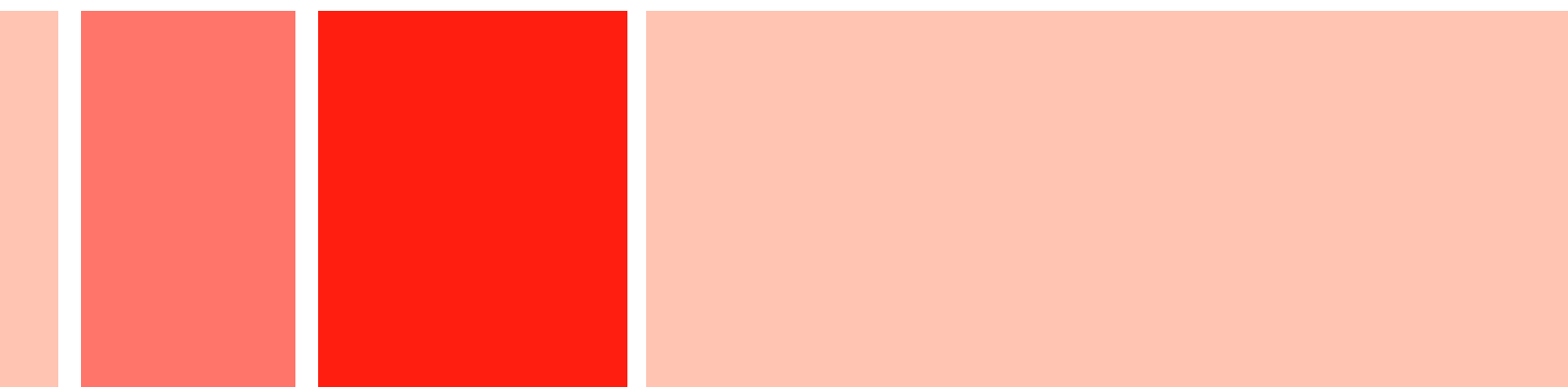
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A Review of Independent Living Adaptations



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Glossary of terms

| | |
|-------------|---|
| DFG | Disabled Facilities Grant |
| HA | Housing Association |
| HRA | Housing Revenue Account |
| ICF | Independent Care Funding |
| ILA | Independent Living Adaptation |
| ILG | Independent Living Grant |
| MAG | Mini Adaptation Grant |
| OT | Occupational Therapist |
| PAG | Physical Adaptations Grant |
| PI | Performance Indicator |
| RAG | Rapid Adaptation Grant |
| RRAP | Rapid Response Adaptations Programme |
| RSL | Registered Social Landlord |
| LSVT | Large Scale Voluntary Transfer (housing organisation) |

Executive Summary

1. In 2014, the Welsh Government commissioned Shelter Cymru to undertake a Review of the provision of independent living adaptations within Wales. This project was commissioned in the light of some £35 million being spent annually by local authorities in Wales on Disabled Facilities Grants (DFGs). and the Welsh Government's own spending of approximately £8 million on Physical Adaptations Grants (PAG) for social tenants.

2. The Review was carried out between May and November 2014 and addressed three aims:
 - Mapping the current system.
 - Performance Indicators.
 - Testing the feasibility of options for change.

3. The methodology comprised the following:
 - A questionnaire for grant providers which elicited 56 responses covering all 22 local authority areas.
 - A wider stakeholders' questionnaire which elicited 14 responses from seven occupational therapists (OTs) and seven other stakeholders from various organisations including local authorities.
 - Interviews with 19 key stakeholders and five service users.
 - A contextual review of related literature.
 - A desktop review of providers' policies and website information.
 - Quantitative analysis of individual level data from nine adaptations grant providers.
 - Quantitative and qualitative analysis of performance indicator data.
 - Four workshops held across Wales with key stakeholders: two in Cardiff (which 41 people attended), one in Aberystwyth (which 16 people attended) and one in Abergele (which 10 people attended).

Mapping the current system

4. The Review identified a fragmented service delivery system with many points of access. There are diverse pathways with a variety of funding streams for different tenures. Funding for adaptations has developed in an ad hoc way in response to wider policy changes, leading to complexity in funding streams as well as eligibility criteria. Although DFG delivery times have improved in recent years, there are still unacceptable delays.
5. The PAG, Rapid Response Adaptations Programme (RRAP) and Independent Living Grant (ILG) pathways stood out as simple, quick and effective systems, in stark contrast to the problems associated with the DFG pathway and the complexity of the adaptations system as a whole.
6. Means testing only applies to the DFG; and the existing means test is viewed by many stakeholders as being time-consuming, inequitable in relation to other funding streams and not necessarily cost effective. There is a lack of consistency around what is classified as a minor or major adaptation, with different providers offering differing thresholds. There is a tendency for some small-scale adaptations to still be delivered through the DFG process, and therefore being subject to means testing and possible delays.
7. There is a paucity of information available to service users about adaptations. The information that is available has an emphasis on older people. Information that is accessible is often complex and inaccessible to people who do not know 'the system'. Service users described difficulties navigating their way through the process and were generally unaware of how the system worked, although most were satisfied with their adaptations.

8. The quantitative analysis, although limited by the availability of suitable data, indicates that the mean cost of an adaptation project is £3,887. The mean time taken to carry out an adaptation is 176 days, with a great deal of variance in this figure.

Performance Indicators

9. The way in which Performance Indicator (PI) information is currently collected is not consistent across the 22 local authorities in Wales, despite clear guidance issued by the Welsh Government. It was suggested by some stakeholders that some local authorities are deliberately ignoring guidance in order to make delivery times look better.
10. The current PI is felt to be too reductive. Positive outcomes are seen as more important to service users than delivery times. There is interest in supplementing data on delivery times with client-focused measures such as customer satisfaction data and/or qualitative information on the impact of adaptations on applicants' lives.
11. Research respondents argued in favour of a single performance reporting regime that included Registered Social Landlords (RSLs) and other agencies as well as local authorities. Although the PI would be measuring different processes it was felt that this would encourage more consistency and more equity between tenures.

Testing options for change

12. A number of key issues emerged during this research:
 - Any systemic change needs to be undertaken with extreme caution due to the vulnerability of many applicants, the scarcity of public

funding and the complexity in the system which increases the risk of unintended consequences.

- Many stakeholders felt that the level of complexity in the system is unacceptable because it leads to inequality between applicants from different tenures in terms of waiting times and costs, and because it is difficult for service users and providers to navigate. An alternative view was also expressed that this situation is an inevitable reflection of the fact that housing is itself complex and is funded in complex ways. According to this view, the existence of many funding streams is actually beneficial since it relieves pressure across the system, meaning that *at least some* people get adaptations delivered relatively quickly, rather than everyone having to wait an equally long length of time.
- There are significant issues with current data collection which prevent a more in-depth understanding of how effective delivery is for different groups.
- There is debate over whether adaptations should be a universal service, free at the point of delivery with no means test, or whether ability to pay should be taken into account. Existing levels of DFG spending would have a greater impact if money were skewed towards delivering the actual works rather than meeting the costs of administration. The Welsh Government principle of 'progressive universalism'¹ has led to policy initiatives such as free prescriptions and bus passes. Means testing is not generally regarded as compatible with this principle.
- There is some evidence² suggesting that removing the means test is likely to have at least some impact on demand although the exact extent is unknown. Although there was a broad consensus that at least some level of adaptations should be removed from means

¹ Drakeford, M. 'Progressive Universalism', in *Agenda* (Winter 2006) Institute of Welsh Affairs, Cardiff: IWA

² Mackie, P., Bowen, K. and McKeever, B. (2008) *Family experiences of accessing Disabled Facilities Grants: A collaborative research study in Wales and Northern Ireland*, Cardiff: Shelter Cymru

testing, the evidence gathered during this Review suggests that there are considerable risks involved in opening up universality too widely, too quickly, at a time of public spending cuts. There is potential for a long-term staged adoption of universal provision.

- There was strong support for creating a three-tiered approach to adaptations, with minor and potentially mid-level adaptations removed from means testing.
- There may be potential to review the existing means test and define a new one that addresses some of the criticisms voiced by stakeholders during this study, namely that the test is a blunt tool for assessing need; is overly complex in terms of the calculation; does not take proper account of the costs of living with a disability; and for these reasons ends up preventing some people from accessing adaptations.

13. Based on the qualitative and quantitative research undertaken as part of this Review, three models for change were developed and analysed.

14. Option 1 – ‘Status quo’ – maintains existing funding streams and delivery agencies, with a strong focus on adopting best practice. This model includes the following:

- All agencies delivering adaptations would ensure that their OT teams are working in the most efficient way possible. All assistant OTs would receive accredited Trusted Assessor training. All agencies delivering adaptations would check procedures against the College of Occupational Therapists’ guidance *Minor Adaptations Without Delay* (College of Occupational Therapists, 2006).
- Local authorities that do not already have a fully operational Accessible Housing Register in place would work with RSL partners to develop one.
- Local authorities that do not already have a full agency service in place would consider introducing one.

- Local authorities that do not already offer stairlift grants would consider following existing good practice in this area.
- Local authorities that do not already have a multi-disciplinary team working on adaptations with OTs in the same team as Housing, would consider reorganising teams in this way.
- Local authorities would revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator.
- Welsh Government would refine performance measurement by separately measuring time taken from initial enquiry to assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all delivery agencies. There is also potential for the development of more service user-focused performance measures.
- Welsh Government would consider ways of improving the quality of data on adaptations across the system to assist the development of good policy. Full equality data would be collected across all protected characteristics in a consistent way across Wales.
- Welsh Government would look at ways of creating greater accountability and transparency among social landlords for efficient use of adaptations. We suggest that social landlords should be required to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal.
- Organisations arranging or providing adaptations would review current information to ensure it is clear and accessible.

15. Option 2 – ‘Unified system’ – merges all existing funding streams into a single pot, to be delivered by a single organisation across all tenures and ages. The model includes the following:

- All adaptations below £1,000 would be delivered via a fast-track system. Local authorities could deliver these directly or work in

partnership with agencies such as Care & Repair. No means testing and no OT involvement apart from in exceptional circumstances.

- Mid-level adaptations would be defined as those costing more than £1,000 and less than £7-10,000 – precise threshold to be negotiated with local government. These adaptations would be delivered without means testing – or alternatively, would be supported by an ILG-style fund which acts as a triage for urgent cases.
- Major adaptations would comprise the most complex. OT involvement would be essential. Again there is potential for an ILG-style fund to triage urgent cases.
- In a unified system, Welsh Ministers would work together to establish shared fiscal responsibility between Health and Housing for adaptations, with Health strategically contributing to a single pot of funding.
- Local authorities would be encouraged to adopt strong local partnerships similar to the approach demonstrated during the ILG pilot, with health, social care, housing and other relevant agencies represented.
- This approach creates the possibility for staged adoption of universality. Funding for lower-level adaptations would be passed to local authorities first to be distributed outside DFG. This would be followed by funding for mid-level adaptations being passed across in a similar way, and finally funding for complex adaptations. Funding would need to be hypothecated, with a contingency fund in place.
- Alternatively, funding for all adaptations could be passed straight to local authorities, with the means test remaining in place. Social tenants who are not currently means tested would be tested.
- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.

16. The financial implications of a unified system are complex. We have identified the following issues:

- DFG funding is currently unhypothecated. If funding for all adaptations were passed to local authorities through General Capital Funding, there is a strong possibility that it would be allocated to other, larger service areas experiencing financial pressures. The risk of reduced resources for adaptations is too significant for unhypothecated funding to be a viable option in the current economic climate.
- Ring-fencing would be extremely difficult to negotiate with local authorities due to a general reaction against this approach. If agreement could be reached over hypothecation, the fund would need to be set at a generous level to avoid the risk of running out mid-year. One potential solution might be for the Welsh Government to retain a contingency fund for local authorities to draw on if budgets run out mid-year.
- Creating a single funding pot would need to be handled sensitively, since there is a significant risk of damaging relations between agencies. Identifying the total amount spent on adaptations and top-slicing Social Housing Grant would be a complex exercise, as would working out how to distribute funding.
- Health is a service area with acute internal pressures on budgets, making the prospect of negotiating shared fiscal responsibility challenging.
- Additional funding would be needed to minimise the risk of bottlenecks in the single LA process as well as to account for LSVT adaptations; any ILG-style triage fund; and any higher demand due to removal of the means test.
- Removing the means test for minor and mid-level adaptations raises issues about ensuring resources go to those least able to afford adaptations themselves.
- Giving local authorities sole responsibility for adaptations removes any incentive for social landlords to increase adaptations funding or

create discrete pots of funding to meet local identified needs – this could lead to less money going towards adaptations overall.

- Taking responsibility for adaptations away from RSLs would lead to redundancies. Local authorities would need to take on new staff to process higher caseloads.

17. Option 3 – ‘Tiered system’ – retains existing funding streams but with a greater focus on building on elements of best practice as demonstrated by PAG, ILG and RRAP. The emphasis is on streamlining the front end of service delivery in a way which is more equitable for service users, while maintaining a range of funding streams to relieve pressure across the system. The model includes the following:

- All adaptations below the value of £1,000 would be defined as ‘minor’ adaptations, removed from DFG means testing and delivered via a fast-track system. OT involvement would not be needed apart from in exceptional circumstances. RRAP would be expanded to apply across all tenures and ages for all adaptations up to £1,000.
- Welsh Government would define a middle band of adaptations. Ideally this middle band should also be delivered without means testing. OT involvement may or may not be necessary depending on circumstances. We recommend that the threshold between mid-level and major adaptations should be set at between £5,000 and £7,000. However, the precise threshold would need to be negotiated with local authorities. The aim would be to set a threshold for removing the means test that can be met as far as possible through existing General Capital funding, by offsetting administrative savings against increased applications. This means that the threshold is likely to be lower than in Option 2
- The third band would comprise major adaptations, for which OT involvement would be essential. These adaptations would need to remain means tested until the full implications of removing means

testing for lower-cost adaptations are known. In the long-term it would be desirable to remove means testing for this band too.

- As with Option 2, this approach creates the possibility for staged adoption of universality, with lower tier(s) being removed from means testing first. Also as with Option 2, removing the means test for minor and mid-level adaptations does raise issues about ensuring resources go to those least able to afford adaptations themselves.
- For all tiers where means testing remains in place, an ILG-style fund would be established to act in a triage capacity specifically for urgent cases.
- Welsh Government could work with one or more local authority partners to trial the complete removal of the DFG means test.
- Welsh Government would work in partnership with local government and, possibly, private sector partners to develop a range of affordable options to assist households to meet their contribution towards the cost of adaptations.
- Welsh Government would establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing means test.
- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.

Conclusions and recommendations

18. The problems with the current adaptations system have been well documented in successive inquiries and reviews³. The purpose of this Review was not simply to revisit those problems but rather to move the

³ Recent inquiries and reviews in Wales include: the *Social Justice and Regeneration Review* (2004); the *Review of Housing Adaptations Including Disabled Facilities Grants* (2005); The National Assembly for Wales Equality of Opportunity Committee's *Still Waiting: Home Maintenance and Adaptation Services for Older People in Wales* (2009); CEL Transform's *Review of Progress in Implementing Recommendations in the Provision of Adaptation Services in Wales* (2010); and the National Assembly Communities, Equality and Local Government Committee's *Inquiry into Home Adaptations* (2013)

debate to the next stage: if we actually implemented some of the proposed solutions that have been discussed over the years, what would the impacts be?

19. In assessing the impacts of options for change, we have noted a certain irony in the fact that the solution which appears on the surface to be the simplest – that is, a move to a unified system – is actually the most complex in terms of the financial implications and levels of risk to service users. Creating a unified system would be a very expensive undertaking and there is little evidence that putting all applicants through one system would result in better outcomes. In fact, the qualitative evidence we gathered suggests the opposite: a strong likelihood of longer waiting times and reduced budgets.
20. This research has identified a wide range of proposals that could feasibly create greater consistency and fairness without the problems of pooling budgets. We argue that a ‘one system’ approach to adaptations should be a guiding principle for policy development regardless of who actually delivers the service. This would mean ensuring that, broadly speaking, recipients of adaptation services can expect similar levels of service no matter what their circumstances may be. It would mean encouraging greater consistency in terms of means testing, information provision and waiting times. It would also mean refining data collection to enable comparisons to be made between providers.
21. It is also important to acknowledge where provision has worked well and to build on that good practice. PAG, ILG and RRAP all stood out in the research as responsive, flexible funding streams that were often delivered in a highly person-centred way. It makes little sense to close down funding streams that work well – rather the focus should be on what works and seeking to replicate that across the system. In practice, that means focusing on DFGs as the funding stream with the greatest level of stakeholder concern over delivery times and inconsistencies.

22. This Review identifies the DFG means test itself as the primary source of inequality in the system. There is a debate to be had around the merits of universal provision as opposed to assessing ability to pay, particularly at a time of reduced public funds. However, this Review concludes that removing the means test *up to a certain level that is consistent across Wales* is financially possible now, and would make a significant contribution towards achieving equality of outcome.
23. This Review outlines a roadmap towards removing the means test for all adaptations *in the long-term*. This needs to be a carefully staged process in order to avoid creating longer waiting times as well as undue pressure on the public purse.
24. This Review recommends that Welsh Government adopt a combination of Options 1 and 3 as follows:

Recommendation 1: Welsh Government should make a commitment to move towards staged adoption of universal provision of adaptations without means testing in the long-term.

Recommendation 2: Adaptations provision should be reorganised into a tiered system that is consistent across Wales:

- Minor adaptations up to £1,000.
- Mid-level adaptations between £1,000 and £5,000-£7,000 (precise level to be negotiated with local government).
- Major adaptations above £5,000-£7,000.

Recommendation 3: Welsh Government should require local authorities to exempt minor adaptations (defined as those costing £1,000 or less) from means testing.

Recommendation 4: Welsh Government should negotiate with local government the exemption of mid-level adaptations from means testing.

Recommendation 5: Welsh Government should make an ILG-style fund available to triage urgent DFG cases for all tiers where means testing remains in place.

Recommendation 6: The RRAP funding stream currently delivered by Care & Repair Cymru should be expanded to cover all tenures and ages for all adaptations up to £1,000.

Recommendation 7: Welsh Government should work in partnership with local government and other partners to ensure that a range of affordable options to assist households to meet their contribution towards the cost of adaptations are available across Wales in a consistent way. Options might include recyclable loans; equity release; charges on properties; assistance provided by Social Services departments under Section 2(1)(e) of the Chronically Sick and Disabled Persons Act 1970; or Home Improvement Loans.

Recommendation 8: Welsh Government should establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing test.

Recommendation 9: Welsh Government should require social landlords to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal.

Recommendation 10: Welsh Government should consider ways of improving the quality of data on adaptations across the system, to assist the development of good policy. Full equality data should be collected across all protected characteristics in a consistent way across Wales.

Recommendation 11: Welsh Government should refine the adaptations performance indicator by separately measuring time taken from initial enquiry to assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all delivery agencies. There is also potential for the development of more service user-focused performance measures. Performance indicators should account separately for minor, mid-level and major adaptations.

Recommendation 12: All agencies delivering adaptations should ensure that their Occupational Therapist (OT) teams are working in the most efficient way possible:

- All assistant OTs should receive accredited Trusted Assessor training.
- All agencies should check procedures against the College of Occupational Therapists' guidance *Minor Adaptations Without Delay* (COT, 2006) which sets out when Trusted Assessors can be used instead of OTs.

Recommendation 13: All agencies delivering adaptations should review current information provision to ensure it is clear and accessible. Information should meet all protected characteristics under the Equality Act and should be available in a range of languages and formats that reflect the diverse backgrounds of the people of Wales.

Recommendation 14: Local authorities should revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator, from first point of contact, as recommended in current guidance.

Recommendation 15: Local authorities that do not already have a fully operational Accessible Housing Register in place, should work with RSL partners to develop one. Serious consideration should be given to ways of including the private rented sector.

Recommendation 16: Local authorities that do not already have a full agency service in place should consider introducing one, to support people through the DFG process as swiftly as possible.

Recommendation 17: Local authorities that do not already offer stairlift grants should consider following existing good practice, by introducing a grant stream that recycles straight stairlifts to be delivered outside DFG.

Recommendation 18: Local authorities that do not already have a multi-disciplinary team working on adaptations with OTs in the same team as Housing, should consider reorganising teams in this way following existing good practice in Wales.

1: Introduction and background to the Review

- 1.1 In 2014 the Welsh Government commissioned Shelter Cymru to undertake a Review of the provision of independent living adaptations within Wales. The project's specification acknowledged the important role that adaptations services play in enabling people to live and continue to live independently in their own homes. This project was commissioned in the light of some £35 million being spent annually by local authorities in Wales on Disabled Facilities Grants (DFGs) and the Welsh Government's own spending of approximately £8 million on Physical Adaptations Grants (PAG) for social landlord tenants.
- 1.2 The Disabled Facilities Grants and Adaptations Review, known as the Jones Review (2005), the Welsh Government's Homes for Wales White Paper (2012), Still Waiting (2009) and the Inquiry into Homes Adaptations report (National Assembly for Wales 2013) had all identified a need to tackle delays, secure improvement in the provision of adaptations and reconsider adaptations performance indicators (PIs). The Framework for Action on Independent Living also highlighted the vital role that accessible, adapted and appropriate housing plays in ensuring disabled people can live independently.
- 1.3 Equally, this current Review was carried out in the climate of change influenced by the Welsh Government's Programme for Government (2014a); Social Services and Well-Being Act (2014b); and Intermediate Care Fund (2014c); all of which create an atmosphere and direction for independent living adaptations which can be summarised as a desire for:

“High quality, integrated, sustainable, safe and effective people-centred services that build on people's strengths and promote their well-being.”

Welsh Government 2014a

and to drive forward:

“collaborative working between social services, health and housing, alongside the Third and Independent Sectors to support people maintain their independence and remain in their own home.”

Welsh Government 2014c:1

1.4 The Welsh Government’s terms of reference for this Review were to:

- a. Understand and summarise the main issues inherent in the current system for adaptation delivery:
 - To understand how each funding programme is targeted, accessed and delivered across all local authorities (to include information on tenure considerations, typical grant amounts, activities’ costs and performance indicator information).
 - To highlight differences and commonalities in delivery mechanisms across all current funding programmes and in local authority approaches to them.
 - To explore strengths and areas for improvement in delivering the current system, with specific focus on quality, speed, value for money and appropriateness.
 - To examine the availability and robustness of current performance management information (broken down by tenure, demographic area etc.).
 - To understand the reasons for changes in local authority performance in adaptation delivery.
 - To identify where the process and delivery of adaptations is influenced by other external factors.
- b. Investigate current performance indicators and outline potential new performance indicators:

- To explore current performance indicators.
 - To outline any potential changes.
- c. Test the feasibility of the potential changes outlined below for the future of the delivery of adaptations:
- To test the assumptions underpinning the potential adaptations delivery and structural changes.
 - To explore the views of those who currently administer and deliver on any potential changes.
 - To explore the financial and budgetary implications of any changes and any potential new funding arrangements.
 - To explore any organisational impacts changes could have on those involved in administering or delivering the current system.
 - To outline any potential legislative changes required to make future changes to the system.
 - To ascertain which option is most viable, or whether there is another more appropriate option to pursue.
 - To identify any particular issues of contention within the options for change which become identified. Options which encompass the following:
 - i. Status quo.
 - ii. Delivery change without structural change.
 - iii. Delivery change with structural change.

Testing the feasibility of delivery change could potentially include:

- Consistent timescales dependent on the type of adaptation.
- A tiered approach to delivery based on a financial ceiling.
- A review of the higher value adaptations process.

1.5 This Review was carried out between May and November 2014. It was commissioned by the Welsh Government in the light of a number of

previous reviews of how the provision of adaptations for disabled people in Wales was currently being, and could be, carried out in Wales. These terms of reference were addressed via a number of methods:

Table 1: Addressing the project aims

| Aim | Addressed by |
|---|--|
| One: Mapping of the current system | <ul style="list-style-type: none"> • Contextual review of related literature. • Questionnaires to stakeholders. • Desktop review of housing regeneration and renewal policies, housing association policies and local authority website information. • Interviews with key stakeholders. • Quantitative analysis of available data. |
| Two: Performance indicators | <ul style="list-style-type: none"> • Quantitative and qualitative analysis of current performance indicator data. |
| Three: Options for change for the future of delivery of adaptations | <ul style="list-style-type: none"> • Analysis of the data gathered (as outlined above) and then tested for feasibility via four workshops with key stakeholders. • Further interviews with six key stakeholders. |

Legislative background

1.6 Literature, legislation, policies and previous reviews of adaptations processes were considered in order to provide a contextual review for the current adaptations system. The aim therefore, is to provide a broad overview of the context in which home adaptations have developed within Wales.

1.7 For most people home is a place of safety and security, yet for disabled people home can represent a challenging environment in which the nature of the property can exacerbate the effects of the person's disability or impairment, particularly affecting their ability to live independently. In order to address this challenge, there are a number of ways of funding alterations to homes needed due to disability. For

example, DFGs are mandatory grants that are available to disabled people to help them adapt their home. The legislation stipulates that DFGs are available to eligible individuals regardless of housing tenure, yet in practice there are different funding routes for different housing tenures which are summarised in Table 2. As well as the funding routes described in the below table, applicants may have other additional sources of funding depending on tenure and location.

- 1.8 The legislation which affects home adaptations is complex and is also evolving in light of recent welfare changes. It incorporates legislation and policy related not just to housing, but also wider policy and legislation relating to disability and equality with specific provision for children, older people and injured ex-armed service personnel.

Table 2: Adaptations funding routes by tenure

| Tenure | Disabled Facilities Grant (DFG) provided by local authorities: up to £36,000 | Physical Adaptations Grant (PAG) provided by Welsh Government and delivered by RSLs: no maximum | Rapid Response Adaptations Programme provided by Welsh Government and delivered by Care & Repair Cymru: up to £350 |
|---|--|--|---|
| Owner Occupier | Yes | No | Yes but only if over 60yrs |
| Private Tenant | Yes | No | Yes but only if over 60yrs |
| Local Authority Tenant | Yes | No | No |
| Registered Social Landlord/Housing Association Tenant | Yes | Yes | No |
| Large Scale Voluntary Transfer Organisation (LSVT) | Yes – but LSVTs should have set aside money to pay for adaptations for disabled tenants and therefore fund it themselves | No | No |

1.9 In addition, devolution has added further complexity with maximum levels of grants differing between the United Kingdom nations, as well as creating a range of different funding options for minor adaptations and aids. This contextual review specifically addresses housing

adaptations in Wales, but draws on wider legislation, policies and information as appropriate.

- 1.10 Although already available at the discretion of local authorities under the Chronically Sick and Disabled Persons' Act 1970, mandatory grants for disabled housing adaptations were first introduced in the late 1980s. The enactment of the Local Government and Housing Act 1989 set out the statutory framework that governed the provision of DFGs. These were incorporated into the private sector renewal programme as part of a wider programme of improvements in private sector housing.
- 1.11 The DFG grant is administered through local authority Environmental Health Officers and Surveyors with input and advice from community Occupational Therapists (OTs). This resulted in a split in provision with community OTs being responsible for determining the extent of the works they deemed necessary to meet the needs of the disabled person, while housing departments became responsible for determining whether the proposed works were both 'reasonable and practical'.
- 1.12 The Local Government and Housing Act 1989 was amended in 1996 by the Housing Grants, Construction and Regeneration Act. Although like its predecessor it set out the statutory duties of local authorities to provide grant aid for a range of adaptations for disabled people, under the new Act only DFGs remained mandatory.
- 1.13 In addition to setting out the statutory duties of local authorities, the Housing Grants, Construction and Regeneration Act 1996 also set out the framework that governed the administration of DFGs including the eligibility criteria and the purposes for which a grant could be used. The criteria used to test financial resources was laid out under the Housing Renewal Grants Regulations 1996 Wales (S.I. 1996/2890) which also determined the maximum level of grant that local authorities could pay for a disabled adaptation.

- 1.14 The current means test for DFGs is broadly similar to that used to calculate housing benefit, with the means test taking into account net income and any savings over £6,000. Grants can be awarded in full or in part, dependent on the financial resources of the applicant. Applicants on means tested benefits will receive a full grant.
- 1.15 Further changes to the legislation relating to housing adaptations came as part of the Regulatory Reform (Housing Assistance) (England and Wales Order) 2002. The Order abolished discretionary DFGs and replaced them with a wider power for local authorities to supplement mandatory DFGs as they saw fit. Under Article 3 of the Regulatory Reform (Housing Assistance) (England and Wales Order) 2002, local authorities were given discretionary powers that enabled them to top up grants over the maximum limit, but also allowed them to provide minor adaptations outside of the DFG process. In addition, the Act enabled local authorities to offer discretionary assistance in the form of equity release or low cost loans to fund adaptations.
- 1.16 To accompany the Regulatory Reform (Housing Assistance) Order, the Welsh Government published supplementary housing renewal guidance (NAfW 20/02) which set out the new purpose for DFGs. The guidance was revised in 2007 and now states that budgets should not be viewed in a '*compartmentalised manner*' and that '*the disabled person should be at the centre of the service provided*'. The guidance held that there should be full involvement of disabled people, their families and representatives in the DFG process, minimising 'the number of personnel contacts with the disabled person, consistent with assessing and meeting their identified needs, appropriately and efficiently'.
- 1.17 In 2008, further changes were implemented as laid out in The Disabled Facilities Grants (Maximum Amount and Additional Purposes) (Wales) Order 2008 (Welsh Government 2008a) which increased the maximum

level of the DFG to £36,000 in Wales, but also specified additional purposes for which a DFG could be used. These included access to a garden and making a garden safe for a disabled occupant.

- 1.18 The rights of disabled individuals to have their needs assessed is enshrined in the NHS and Community Care Act 1990, which not only provides the framework in which an assessment can take place but also places a statutory duty on the local authority to provide for those needs in the provision of services to support the individual. This right of individuals to have their needs assessed was further extended in 1995 to include carers under the Carers (Recognition and Services) Act 1995. This Act placed a duty on local authorities to undertake a carers' assessment if one was requested, but it also stipulated that the assessment must be included in the decision-making process when deciding on the services that would be offered to the disabled person. Although not explicitly referring to housing adaptations, the Act placed a duty on local authorities to consider the needs of both the carer and the disabled person in the decision-making process with regard to housing adaptations.
- 1.19 Furthermore, under the Community Care (Delayed Discharge etc.) Act 2003 (England and Wales) where an individual has been identified as having an assessed need, there is provision for local authorities to provide adaptations and equipment costing less than £1,000 free of charge, in order to facilitate daily living.
- 1.20 Home adaptations as a method of removing disabling barriers are aligned with the social model of disability, which was adopted by the Welsh Government in 2002. The social model of disability recognises that disability arises not out of impairment itself, but from barriers in society and the (built) environment which prevent people with a range of physical, mental, sensory or learning difficulties from participating fully in daily life. The social model of disability therefore cuts across a number

of policy areas relating to disability and housing. The Framework for Action on Independent Living 2013 (Welsh Government 2013a) sets out the Welsh Government's commitment to developing a co-ordinated strategic vision on disability equality across several key policy themes – including accessible housing.

- 1.21 The Welsh Government's Framework for Action on Independent Living (2013a:20) clearly cites adaptations as a vital component of independent living for disabled people in Section 3 of the Framework:

3) Improved access to adapted and accessible housing.

We will:

encourage further action to improve and expand the use of Accessible Housing Registers by local authorities and partners;

commission a review of aids and adaptations programmes during 2013-14 to inform the need for changes to existing programmes. The needs of people who require such services will be at the heart of this; and

continue to work with the Welsh Local Government Association and local authorities to promote a more person-centred approach to the provision of housing adaptations as part of a wider service.

- 1.22 One of the key outcomes of the Framework for Action on Independent Living 2013 (Welsh Government 2013a), is to enable disabled children and adults to live independently by improving access to adapted and accessible housing. The document sets out the actions of the Welsh Government in relation to a range of housing issues including promoting a more person-centred approach to home adaptations services and

includes proposals to improve the conditions and practices of the private rental sector.

- 1.23 The rights of disabled tenants to request adaptations or improvements to their home are already protected under legislation laid out under the Equality Act 2010, which places a duty on housing providers to make *'reasonable adjustments'* for disabled tenants. The legislation also prevents landlords from unreasonably withholding consent for disabled adaptations to a property.
- 1.24 Further legislative reform in Wales came from the Social Services and Well-Being (Wales) Bill 2014 which was enacted in March 2014. Although not specifically relating to housing, it does place the onus on Social Services to *'promote the well-being of people who need care and support and carers who need support'*. Housing-related support could be included within this remit, although this is not explicitly stated. The Social Services and Well-Being (Wales) Bill 2014 repeals some of the existing legislation including among others, the Carers (Recognition and Services) Act 1995, the Carers (Equal Opportunities) Act 2004 and the Carers Strategies (Wales) Measure 2010 which will now be incorporated into a single provision within the new Bill. The Bill also repeals the Community Care (Delayed Discharges) Act 2003 with the power to make regulations as enacted under section 16 of the Community Care (Delayed Discharges) Act 2003, now being covered by the new Bill under Charging and Assessment provisions.
- 1.25 Eligibility criteria for adaptations will also be affected by changes to disability benefits which were introduced by the Welfare Reform Act 2012, which it is anticipated will adversely affect approximately 42,500 disabled adults in Wales by 2018 (Welsh Government 2013:23). Furthermore the removal of the spare room subsidy for social housing tenants introduced as part of the wider welfare reforms, will also have an impact on adaptations. While the removal of the spare room subsidy

will not impact on the eligibility criteria for an adaptation, it will be a consideration for social housing tenants who have a disability or who are caring for a disabled person. Exemptions for adapted properties are subject to specific criteria, with spare rooms only being exempt if permanent overnight care is required or for a child who cannot share a room because of disability or a medical condition. In practice, tenants' rights groups in Wales have reported cases where some housing providers have refused adaptations requests where there is under-occupancy. Wales & West Housing Association published research in February 2014 (Wales & West, 2014) estimating that the removal of the spare room subsidy will lead to £40 million of public money being 'wasted' in Wales due to disabled residents being forced to move out of adapted properties and have new properties adapted.

- 1.26 The Welsh Government also stipulates in its Design Quality Requirements (Welsh Government 2008b) that new-build social housing be future-proofed and built to accessible (i.e. Lifetime Homes) standards.
- 1.27 In addition to the above legislation, certain legislative changes have been specifically aimed at children and young people. The 2004 Children Act is an important piece of legislation that has framed subsequent policy and legislation. This wide-ranging Act not only provides a framework around the care and protection of children and young people, but also incorporates specific provision for disabled children under *Section 17 Provision of services for children and their families*, which stipulates that it is the duty of local authorities to *'safeguard and promote the welfare of children within their area who are in need; and ... so far as is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children's needs'*.
- 1.28 Furthermore the Carers and Disabled Children Act 2000 expanded on the earlier Carers (Recognition and Services) Act 1995 by giving local

authorities the power to provide services which in their opinion, would help the carer to provide care. In 2005, the Housing Renewal Grants (Amendment) (Wales) Regulations 2005 was enacted. This piece of legislation abolished means testing in Wales for children under the age of 19 years. The abolition of means testing for children arose out of the recommendations of several reviews of DFG processes in Wales and the other UK nations which felt that the test of resources system was unfair as the system was poorly targeted, and that families with a disabled child were particularly disadvantaged.

- 1.29 Cross-cutting through the legislative changes that affect children are the wider policy changes including the implementation of the National Service Frameworks for Children, Young People and Maternity Services which was introduced in 2004. Embedded within the framework was the National Service Frameworks for Disabled Children and Young People and those with Complex Needs which specifically promotes the social inclusion of disabled children in order to *'enable them to participate in childhood, family and community activities'*. The national service framework for disabled children includes specific provision for access to housing, equipment and assistive technology noting that the provision of adaptations requires close interagency co-ordination. The framework also acknowledges the role of housing in promoting the optimal development of the child.
- 1.30 The rights of disabled children are also enshrined under Article 23 of the Rights of Children and Young People (Wales) Measure 2011 which recognises the right of disabled children to *'enjoy a full and decent life, in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community'*. It also acknowledges the rights of disabled children to assistance appropriate to their needs. This would include the right of a disabled child to a home adapted to their needs. The Rights of Children and Young People Measure 2011 stems from two international human rights conventions: the UN

Convention on the Rights of the Child ratified in 1989 and the UN Convention on the Rights of Persons with Disabilities which was ratified in 2009. Under Articles 3 and 4 of the UN Convention on the Rights of the Child '*the best interests of the child must be the primary consideration*' when delivering services, and states must use the "*maximum extent*" of available resources to realise children's economic, social and cultural rights'.

- 1.31 Additionally Article 7 of the UN Convention on the Rights of Persons with Disabilities has specific provision for disabled children which stipulates that '*State Parties must take all necessary measures to ensure the full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children*'.

Conclusion

1.32 Legislation and policy on adaptations is complex, relating not only to housing but also disability and equality with specific provision for children, older people and ex-armed service personnel. Relevant legislation includes: the Local Government and Housing Act 1989; the Housing Grants, Construction and Regeneration Act 1996; Regulatory Reform (Housing Assistance) (England and Wales Order) 2002 and accompanying guidance NAFW Circular 20/02; the Disabled Facilities Grants (Maximum Amount and Additional Purposes) (Wales) Order 2008 (Welsh Government 2008a); as well as numerous pieces of legislation on disability, equality and human rights.

2: Methodology

2.1 In order to address the Review's aims, information was gathered from a range of sources as described within each section, below.

Aim 1: Mapping the current system

2.2 This aim was addressed via:

- A contextual review of literature.
- Questionnaires to stakeholders.
- Interviews with stakeholders and service users.
- Quantitative analysis of available data.

2.3 As part of addressing this aim, two separate questionnaires were sent to stakeholders:

- Questionnaire One was sent to 86 grant providers in Wales: 37 were sent to RSLs, 22 to Care & Repair agencies and 27 to contacts in the 22 local authority Private Sector Housing teams. This questionnaire intended to investigate views on the types of grants available, where funding was located and what should happen to it, recent changes in provision, classifications of grants, any perceived causes of delays, strengths and areas for improvement and ways in which performance was measured. For a full set of the questions asked in the questionnaire to grant providers see Appendix 1.
- Questionnaire One elicited 56 responses and covered all 22 local authority areas. Of those who responded, 13 respondents were from local authority housing departments, 14 were from local authority social services departments, 14 respondents were from housing associations, eight respondents were from large scale voluntary transfer housing organisations and 14 respondents were from Care and Repair agencies. The respondents' roles ranged from being

directly responsible for managing staff carrying out adaptations provision, through budget control, to reporting on the currently required performance indicators of time taken to complete an adaptation.

- Questionnaire Two was sent to wider stakeholders in Wales. A snowball sampling technique was used, whereby an initial group of 24 stakeholders was requested to forward the questionnaire on to their own networks. This questionnaire intended to investigate views on timescales, the effect of housing tenure on adaptations, performance indicators, funding and any perceived causes of delays in the system of adaptations processes. For a full set of the questions asked in the questionnaire to wider stakeholders see Appendix 2. Thematic data analysis of the questionnaires' responses was carried out.
- The second questionnaire elicited 14 responses (seven OTs and seven other stakeholders from various organisations including local authorities).

2.4 One objective of the Review was to undertake an analysis of data held by providers about the adaptations process. The expectation was that the information would be used to evaluate the impact that the type of scheme, the type of adaptation work done had on costs and on the time taken to complete adaptation projects. The intention was to use multivariate analysis techniques such as regression to estimate the impact of a range of determinants on different performance indicators, including money costs, time costs and client satisfaction.

2.5 In order to address the three research aims, it was necessary to develop and apply a generic framework for economic evaluation of independent living adaptations schemes. In order to undertake this task, information requests were made to 22 local authorities; 27 RSLs; as well as Care &

Repair Cymru in relation to RRAP and ILG and Welsh Government in relation to PAG, for individual level data about:

- the type of adaptation work;
- the cost of adaptations;
- customer satisfaction;
- days taken to complete the adaptations; and
- the demographic details of service users.

2.6 Of the providers who were able to provide information, many were only able to return aggregated, descriptive statistics concerning their adaptation services. The Welsh Government supplied aggregated data over a two-year period on the PAG scheme. Some providers, whilst holding some data at the right level of detail, reported that they did not have the time or resources to produce the required dataset. In some cases, this was due to the majority of the information being recorded in free text.

2.7 Aggregate level information was unsuitable for multivariate analysis, as this methodology focuses on the impact that factors, such as the type of work or the type of scheme, have on the efficiency and the effectiveness of adaptations, after accounting for other relevant information. Therefore, the data relating to providers for whom only aggregate level data was available had to be excluded from the multivariate analysis.

2.8 In total, data for individual cases was only available for nine providers: seven local authorities provided information about their DFG schemes and two housing associations provided information about their PAG schemes. All seven of the local authorities were based in South and West Wales. The two housing associations were based in Cardiff and Bridgend. It should therefore be kept in mind that we were not able to gain access to data for Mid or North Wales so, whilst the local authorities did cover a range of rural and urban locations, including

smaller and larger authorities, the findings may not be representative of Wales as a whole.

- 2.9 The data that was provided had not been collected in a standard format and the kinds of information available varied by provider. The information held in different datasets differed, with many performance indicators being recorded differently across different providers. For example, the type of adaptation work undertaken was available for some providers and not for others. Most providers recorded free-text information about the type of adaptation work done, whilst others recorded the type of adaptation work using a coding framework. Thus the non-standardised format of the data was a significant obstacle to overcome for the final analysis. No information was provided in relation to RRAP or ILG.
- 2.10 The nine providers were able to provide information about 4,764 individual adaptation cases. In discussion with colleagues in Welsh Government, it was agreed that whilst noting the limitations of the data, it would nevertheless be worth analysing and presenting the existing data even if only in order to provide **indicative estimates** with regard to the duration and cost of adaptations; and assessing the suitability of the existing funding thresholds. Thus both regression and quantile regression were used to provide results.
- 2.11 Although providers were asked for any data they held on customer satisfaction data and on the characteristics of service users, only one provider was able to provide customer satisfaction data and another, data on the characteristics of service users. Given the limitations this would have placed on any conclusions derived from this data, the decision was taken in discussion with Welsh Government, not to report on these issues.
- 2.12 Due to the limited amount of data that was available for analysis and the fact that it was only available for South and West Wales, the reader

must note that **the findings presented in Section 3.4 must be viewed with caution.**

- 2.13 A desktop review of the information provided by grant providers regarding their adaptations provision was also undertaken. All 22 local authorities' websites and housing regeneration and renewal policies were reviewed, along with 21 housing associations and Care and Repair agencies' policies on adaptations.
- 2.14 The review consisted of locating and reviewing available local authority private sector renewal and housing strategies and websites, housing association websites, adaptations strategies and policies, alongside any locatable associated leaflets or pamphlets of the organisations concerned.
- 2.15 The search terms used for the website searches included:
- 'Disabled adaptations'.
 - 'Stairlift'.
 - 'Adaptation'.
 - 'PAG'.
 - 'DFG'.
- 2.16 The types of issues addressed in the interrogation of organisational information were ease of locating information on adaptations and the clarity of that information.
- 2.17 In addition 13 key stakeholders were interviewed in total, nine of whom were from grant-providing organisations and four of whom were from wider national umbrella organisations related to disability or social care/housing professions. These semi-structured interviews addressed issues such as the current system and any recent changes, time taken for adaptations, personnel involved in the process, funding, suggested changes and performance indicators.

2.18 In order to supplement the indicative information on current service provision, five semi-structured interviews were also carried out with service users. These interviews addressed issues such as information on applying for an adaptation and the service users' experiences of the system. Interviews were undertaken with the parent of a child living in an owner occupied property, the parent of a child living in a housing association property, an adult of 68 years who had had an adaptation before returning home to an owner occupied property from hospital, an adult of 74 years living in a council owned property and an adult of 44 years living in an owner occupied property. While the findings drawn from these interviews cannot be said to be representative of all service users given the small number interviewed, they provide an insight into the general issues regarding access to information and the adaptations process itself. The Review also aimed to understand issues pertaining to the service user through asking stakeholders about aspects of the service user experience and via the desktop review of the information provided by grant providers. The latter explored the ease with which a member of the public, and potential service user, could access information on adaptations and access to the system itself.

Aim 2: Performance indicators

2.19 The suitability and current use of performance indicators was examined via the quantitative analysis of individual information on adaptations provision, with particular attention being paid to the time taken to carry out an adaptation which is the current performance indicator. Additionally, both questionnaires, the interviews and the desktop review interrogated the issue of the current way of reviewing adaptations provision performance; and views on any changes needed to that system.

Aim 3: Options for change

2.20 In order to examine the feasibility of options for change, four workshops with stakeholders were facilitated: two in Cardiff (which 41 people attended), one in Aberystwyth (which 16 people attended) and one in Abergele (which 10 people attended).

2.21 All workshop participants were experienced practitioners working in the field of adaptations. The following stakeholder groups were represented:

- Local authorities (primarily adaptations services and grants departments).
- Housing Association adaptations services.
- Care & Repair Cymru/Care and Repair agencies.
- Occupational Therapists.
- Private landlords.
- Third sector disability organisations.
- Welsh Government.
- Older People's Commissioner for Wales.

2.22 The workshop members were presented with 13 issues to consider which had emerged from the quantitative and qualitative data collected and analysed as described above. For a full set of the issues discussed by stakeholders in the workshops, see Appendix 5.

2.23 A further five interviews were carried out with six key stakeholders who had extensive knowledge of the adaptations system, in order to examine in detail the implications of the models for change that had emerged from the quantitative and qualitative data collection. Interview participants came from the following sectors: local authorities; occupational therapists; housing associations, Care & Repair Cymru; and Welsh Government.

3: Understanding the current system

3.1 This section aims to investigate and develop an in-depth understanding of the current system of independent living adaptations. This involved a number of different elements, including a number of desktop reviews; qualitative research with stakeholders such as local authorities, social landlords, OTs and Care & Repair agencies; qualitative research with service users; and quantitative analysis of available data (provided by stakeholders such as local authorities and RSLs).

3.1: Previous reviews and inquiries of adaptations services

3.1.1 A number of reviews and inquiries into the system of independent living adaptations have been undertaken in the last decade (Welsh Assembly Government 2004; Jones 2005; NAFW 2009; CEL 2010; NAFW 2013). These have viewed the adaptations system as being complex, bureaucratic and lengthy and often leading to delayed hospital discharge.

3.1.2 The first of the Welsh investigations into the adaptations process was an inquiry by the Social Justice and Regeneration Committee which reviewed housing policy for older people. Although not specifically addressing disabled adaptations, the Social Justice and Regeneration Review (Welsh Assembly Government 2004) noted that long delays in adaptation provision were causing difficulties for older people and their carers; and impacting on their ability to remain safely in their own homes, or increasing the number of delayed hospital discharges. It made a series of recommendations around the need to address the delays in waiting times for adaptations; action to address the shortage of occupational therapists; as well as recommendations to review the DFG process and the eradication of means testing.

- 3.1.3 In 2005 the Jones Review (Disabled Facilities Grants and Adaptations Review – Wales), was commissioned by the Welsh Government. This review identified a number of issues around legislation, funding, waiting times and delays as well as the complexity of funding streams for different housing tenures. As a result, 37 recommendations for change were made, including: the abolition of means testing for children (implemented in 2005); better sharing of best practice to minimise delays; the delivery of minor adaptations outside the DFG framework; and the continuation of the RRAP.
- 3.1.4 The 2005 review was followed in 2009 by The Equality of Opportunity Committee Inquiry (National Assembly for Wales 2009), which explored the issue of disabled home adaptations for older people. The inquiry found that long delays were still being experienced by older people requiring a home adaptation, and that the system for applying for adaptations was complex and not consistently delivered. This issue was affecting people not just in different parts of Wales but also in different housing tenures.
- 3.1.5 The Committee made 15 recommendations for change, including calling for a full evidence-based review of progress made since the 2005 Review. Fourteen of these recommendations were accepted either in full or in principle by the Deputy Minister for Housing. The recommendation to conduct a full review was addressed in 2010 when the Welsh Government commissioned a review of the progress made since the 2005 Jones Review. The Review of Progress Implementing Recommendations on the Provision of Adaptations Services in Wales 2010, concluded that despite finding some progress on completion times for delivering a DFG and the abolition of means testing for disabled children, progress had not been consistent and little progress had been made in addressing the issues identified in the 2005 review.
- 3.1.6 In 2013, a further inquiry into disabled adaptations was undertaken by the National Assembly for Wales with the aim of addressing the reasons

why variations still existed in the time taken to deliver adaptations; to gauge the progress made since the previous reviews and inquiries; to see what impact reduced resources had on adaptations provision; and what could be done to improve the delivery of disabled adaptations. Public consultation deemed the current system for delivering disabled adaptations to be overly bureaucratic, and the complexity of the funding streams and eligibility criteria for different housing tenures were of particular concern. In addition, the lack of publicity and the paucity of information about adaptation services were highlighted as ongoing issues, and it was noted that where information was available it was often aimed at older people. Furthermore, a number of problems both with the system and delivery of disabled adaptations were flagged, with significant variations in completion times for DFGs and unacceptable delays. Other issues flagged by the public consultation included, among others: inconsistencies in the application of means testing and small scale adaptations; the need to adopt best practice; the need to review performance monitoring; and funding. The Inquiry made 23 recommendations of which 19 were accepted in full or in principle by the Minister.

3.2: Stakeholder perspectives

3.2.1 As outlined in Section 2, the views of stakeholders were gathered via two questionnaires (one for grant providers which received 56 responses and another for wider stakeholders which received 14 responses). Interviews with 13 stakeholders were also undertaken for this element of the Review, nine of whom were from grant-providing organisations and four of whom were from wider national umbrella organisations related to disability or social care/housing professions.

The ways in which funding programmes are currently funded, targeted, means tested and delivered

- 3.2.2 Questionnaire responses revealed that the majority of DFG adaptations funded by local authorities come from the local authority capital programme fund. Council-owned housing adaptations are funded from the Housing Revenue Account (HRA) or DFG, and minor works (although variously defined) are funded from Social Services Revenue funding.
- 3.2.3 The majority of interview participants and questionnaire respondents stated that the adaptation system as a whole was complex, and that a major contributing factor was the number of potential funding streams. Participants listed the various funding streams that could be used for adaptations – DFG; ILG; ICF; PAG; RRAP (for Care & Repair agencies); and housing associations' own Minor Adaptations Budgets (MAB). Many participants stressed the problems associated with having so many different budgets and the complexities arising from such a wide range of funding streams.
- 3.2.4 The DFG in particular was pinpointed by many respondents as problematic as being a long, drawn-out and complex process. Examples were provided of adaptation plans being abandoned due to the complexities of navigating the DFG and its different stages. Excessive bureaucracy and long timescales were reported as issues with the current DFG system. Participants expressed the need for the DFG to be streamlined or simplified, with suggestions made for it to be more akin to the PAG, and its fast-track approach in particular.
- 3.2.5 The questionnaires asked for details of the ceiling for minor adaptations. The results show that minor adaptations are not defined consistently across providers and the ceiling for minor adaptations can be set as low as £200 and as high as £5,000 before a DFG process has to be

invoked. Local authorities fund DFGs up to the statutory limit of £36,000 and some local authorities top up that limit with discretionary grants or loans.

3.2.6 All of those who participated in the research were aware of the other funding streams applicable to social housing, and were confident that they could decide which funding stream was most appropriate for which applicant. These streams were stated as being:

- DFG up to £36,000.
- RRAP up to £350.
- PAG with no financial ceiling.
- LSVTs approach adaptations funding on a case by case basis although one respondent stated that if the sum required for a particular adaptation was large, they would explore other housing options.
- Minor adaptations funding streams where financial ceiling levels vary considerably.

3.2.7 Independent Care Funding (ICF) was described by some respondents as a new fund aiming to ease pressure on the NHS by supporting older people to remain in their own home. One local authority respondent also described use of Rapid Adaptations Grants (RAGs) and Mini Adaptations Grants (MAGs), which are individual authorities' determination of minor adaptations funding.

3.2.8 The Independent Living Grant (ILG) was also mentioned by many respondents although it no longer exists. The ILG pilot was delivered by Care & Repair Cymru on behalf of the Welsh Government for two years from 2011-13. The objectives of ILG were to help relieve pressure on DFG waiting lists, maximise independence, help relieve pressures on hospital acute admissions and help speed up hospital discharge.

3.2.9 When asked if funding streams could or should be pooled into one funding pot, there was a mixed response from the grant providers who responded to the survey with over half (33 out of 56) in favour of a single pooled funding system, but a lack of clarity around where respondents thought the funding pot would be held.

3.2.10 There were a wide range of comments related to this pooled funding, with no clear consensus emerging:

'No. Pooling budgets from so many different sources/organisations is extremely difficult. In all my 30+years experience I've never seen it work very effectively or even happen that often. Seen as too hard and probably is. Minor adaptations (definition needed) is the most likely to succeed for pooling as the money levels are relatively low and do not cause too much panic with organisations that have to contribute to a central fund or gain from a free central fund that they have no control over'

'Yes. There does not seem to be a logical reason for the different funding streams i.e. local authority DFGs, PAGs for RSLs, Intermediate Care Fund monies. This leads to different services, some means tested, some not, different levels of performance and some confusion for both OTs and the clients. One point of access with a consistent service with appropriate service standards would be a benefit to all.'

'No, I would not want to see the funding pooled into a single pot for all tenures, but there should be one service and one process to deliver adaptations to all tenure. In the past there was one pot of funding for Council and Private Sector adaptations. However, analysis of the tenure of the clients assisted at the time was heavily weighted to Council tenants. When separate funding streams were introduced this opened up the availability of DFGs to private sector

owners and tenants. There is a danger this inequality could occur again if all the funding were pooled in to one pot.'

3.2.11 Means testing – otherwise known as the Test of Resources (ToR) – was discussed by all respondents. Although some respondents stated that the means test brought additional complexity, complications and delay to the process, there was no agreement that it should be abolished in its entirety. The concern was that abolishing it may cause a flood of applications. However, two interviewees described how this hadn't been the case when means testing for children's adaptations was removed. There were also questions as to how much the process of means testing actually cost in itself and some wondered whether it would be financially possible to remove it.

3.2.12 The means test was seen by the stakeholders interviewed as a barrier to implementing adaptations policy or a cause of delay:

'We have got a 28 per cent cancellation rate, arguably because of the means test. Various reasons: one is "I can't afford the contribution". The other is "I don't want to disclose my financial information to you thank you very much".'

'it (the means test) also causes us problems when we go through the means test because they don't have the information we require. Even though we go through with them "this is what you need", you go there and it is not available to them and there is a delay. So it does cause problems.'

3.2.13 There was concern that removing the means test might put too much strain on budgets with one interviewee expressing the view that *'the budgets are going to be the main barriers... Money and budgets and there not being enough of it.'*

3.2.14 Some respondents expressed the view that means testing added to the sense that the whole system is process-driven not user-led, and needed to be changed. There was a suggestion to use means-testing only for the most complex adaptations such as extensions and removing it for more minor adaptation work, a recommendation that was also made by Chris Jones in his 2005 review (Jones, 2005). Therefore while there was agreement on the negative aspects of means testing, it was felt that in reality means testing could not be removed due to pressures on the current budget; but change was needed in some form.

3.2.15 In relation to how grants are delivered, respondents were generally in agreement that the various adaptations methods were mainly determined and decided upon by OTs from local authority social services settings in the first instance and based on the prioritisation of criteria such as: discharge from hospital (1), risk of accident (2) and a desire for independence (3).

3.2.16 When asked whether there was a threshold below which an OT was not involved, grant providers offered a mixed response, but the majority stated there was no set figure. Some respondents felt there should be an initial gateway screening of service users to determine whether there was a need for OT input.

3.2.17 Where OTs were not required to make an assessment, Trusted Assessors (TAs) were the most commonly used alternative. Most survey respondents felt that there were delays to adaptations and much of this was attributed to a lack of OT resources, though one respondent disagreed saying:

'In the past OTs (or lack of them) was usually blamed for delays, which has been much rectified in my experience.'

3.2.18 The majority of grant providers, therefore, reported that they require an OT to carry out the assessment for adaptations. However, there was

disagreement in relation to the threshold below which the OT would not be required to make a full assessment:

'Not a specific figure – but a threshold in terms of the complexity of the works required.'

'If simple handrails required to facilitate hospital discharge - the Hospital OT can send it straight to C&R to undertake the works – no OT or OTA assessment'

'The trigger within XXX authority is complexity and not cost. At that first point of contact the cost will not always be known, but the complexity of a client can be assessed through screening to determine the need of an OT or an OT Assistant/Trusted Assessor.'

'Preventative works for homeowners and private tenants, which fall into the low to moderate category do not require OT assessment, they are currently assessed by an OT trained grants officer who then refers them on to the Agency to process under RRAP project funding.'

3.2.19 In summary, a mixed picture of adaptations is presented, with the following issues related to funding and delivering adaptations being identified:

- Thresholds for triggering the means test appear to have grown organically and may not have been subject to regular scrutiny; and in some cases figures seem to be quite arbitrary.
- The arbitrary nature of thresholds seems to be driven by local policies, tenure and social care context, rather than any objective performance standard or cost/benefit assessment.
- There appear to be some clear examples of inequities in the current financing of adaptations which are seen as being due to the complexity of the means testing system: housing association

tenants can access PAGs and are therefore not means tested. If the same tenant had an LSVT landlord, they would be unlikely to be means tested. However, if they rented privately they would apply for a DFG which would be means tested. If they rented from a local authority landlord they would be means tested unless their landlord funded adaptations through an alternative route to DFGs such as Housing Revenue Account, in which case they would not be means tested.

- Pooling adaptations funding was seen as desirable but would be complex to achieve and there was no clear agreement as to where the funding should be held.
- There is not always the need for an OT assessment.

The differences and commonalities in delivery mechanisms

3.2.20 The majority of survey respondents were aware of differences in delivery mechanisms, especially in relation to the definition of a minor work of adaptation and its upper funding limit. Cost and type of adaptation (usually consisting of non-technical work) were key determinants of whether an adaptation was regarded as minor/fast track or major and in need of DFG or higher PAG funding. The highest level of fast track was the ILG at £10,000 with the lowest level set by one local authority of £200 for minor adaptations. One LSVT had a minor adaptations limit of £5,000. Thus the main difference in the adaptations provision is based on the cut-off point for the minor adaptations limit, where there is little similarity across the sector.

3.2.21 Half of grant providers who responded to the survey reported they used framework agreements, and opinion of the use of framework agreement was divided. Some felt they sped up delivery and led to greater economies of scale, while others felt framework agreements were too limiting, created a risk of being tied to poorly-performing contractors, and tended to favour large contractors while excluding small-scale local businesses.

3.2.22 Comments associated with the use of framework agreements were as follows:

'We use a select list of local contractors, they all work to the same agreed rates, we select the most suitable contractor for the job/client. The system we use allows for greater level of flexibility which improves performance and customer experience.'

'(a) framework attracts bigger contractors; the personal touch is often lost due to sub-contracting, our select list of contractors have been educated to deliver work to a high standard and spec and know what is required. This is often lost on framework agreements.'

'we use a schedule of rates – we believe it streamlines the process, whilst providing value for money. It reduces the administration time and cost, the disruption to client, allows more control over cost and process, (including unforeseen works) and has achieved much more timely completions.'

3.2.23 There were considerable similarities in the views of grant providers about what the adaptation funding covered, with all providers stating that specialised equipment was included in the funding, although ceiling track hoists were variously regarded either as adaptations or specialised equipment depending on the local authority. Half (28 responses) stated that decoration costs were included, but this figure fell to 10 responses when matching décor costs were discussed.

3.2.24 When asked about agency type provision for disabled people seeking an adaptation, most grant provider respondents (33) stated that they offered such provision. The charge for such a service is very diverse and ranged from 5 – 15 per cent of the adaptation cost or is on a sliding scale. Comments associated with this included:

'Full agency type service is usually only required for major adaptations which is part of core service for self referring clients so no charge.'

'ILG has an agency fee of 10 per cent.'

'Our fee is not calculated as a percentage. The fee is based on sliding scale set against price bands for the cost of the work. This helps to more accurately reflect the resource that has been employed to manage the grant work.'

The strengths and areas for improvement in delivering the current system

3.2.25 Both questionnaires asked respondents to comment on the strengths and areas for improvement of the current adaptations system. The fact that an adaptations system exists and provides a large number of individuals with independence and increased quality of life was viewed in both questionnaires as a strength. Other more tangible outcomes were also reported such as: reduction in falls, prevention of hospital admission and timelier hospital discharges.

3.2.26 On the whole grant providers described delivery very positively, with minor adaptations delivered quickly (e.g. six weeks on average, or less for simpler ones). Similarly, RRAP in particular was described as effective and very fast, with small works being completed in up to eight days through this fast-track scheme.

3.2.27 A number of interviewees discussed examples of good practice. For example, one stressed the importance of ensuring the service user is involved in the process of what adaptations are needed in order to ensure successful delivery. Others described how they choose their contractors carefully from a small pool of trusted contractors in order to minimise the delays in delivery. One provider is also considering

bringing the delivery of works in-house rather than tendering to outside contractors in order to retain control over the delivery of adaptations.

3.2.28 Providers identified certain local authority areas as exemplars of good practice and participants felt these examples could be shared and learnt from. For instance, the use of 'progress chasers' in some local authorities was viewed positively and the categorising of certain adaptations as equipment (such as ceiling tracking hoists) by some authorities (so they can be processed quickly with no means test) was viewed as effective. However, the matter of whether there should be greater consistency between the different authority areas was not fully agreed upon, and in fact it was felt that differences between local authority areas were somewhat inevitable, and in fact necessary, due to local distinctiveness. One interviewee for example states that '*best practice and best service delivery*' take precedence over consistency.

3.2.29 The fast track systems were rated as being highly effective by most respondents. However, when asked about the thresholds for means testing related to adaptations (which are set locally), the responses varied widely from none at all, through to £200 and up to £5,000. Some local authorities reported that they had not reviewed or changed the thresholds in a long time.

3.2.30 Many respondents had views on the inequities in the funding system and made comments as follows:

'the non-means tested limit has not changed for many years (as applied in this authority) so I believe a suitable amount available to assessors to undertake smallish adaptations works would help the process and speed up provision. A higher non-means tested amount would meet some of the aspirations of an improved service.'

'There are many arguments about the appropriateness of... means testing in general. The efficacy, effectiveness and equality issues

are not easy to balance and vary with some good purpose such as fast track for adaptations that would save public money such as hospital discharge or prevention. On balance I think that you either do away with all means testing which may be publicly unaffordable (no one really knows) or you set a limit as in the ILG before means testing.'

'We do not means test Council tenants at all, unless their tenancy is less than 12 months old and they have not previously been social housing tenants. This provision is to pick up those people who may have sold their property to move in to social housing and they have a large nest egg that could contribute towards, or fund their own adaptations.'

3.2.31 Interviewees also raised the issue of inequality in relation to tenure. In terms of budgets and funding, those from particular tenures (such as owner occupiers) are restricted from accessing PAG for instance, since PAG is funded from Social Housing Grant, and are therefore seen as having an inequitable and inferior experience of adaptation budgets and funding. While homeowners have access to RRAP for minor adaptations, any works above the value of £350 must be paid for privately or through DFG.

3.2.32 Interviewees also stated that there was further inequality in relation to LSVT tenants, since some LSVTs did not have equal access to adaptation funds, as they were not eligible to access the PAG. Examples were provided of how tenants from such housing associations were at a disadvantage if they needed adaptations as they would have to rely either on the housing association's own funding (if they had a dedicated minor adaptations fund) or apply for a DFG, even for minor works.

3.2.33 Discretion in terms of funding often played a part. For example one local authority no longer topped up DFGs which exceeded the £36,000 limit,

but requested the top-up to come from the stock transfer housing association budget for minor adaptations.

3.2.34 This inequality is summed up in the following extract:

'Access to public money based on the type of organisation you happen to be a tenant of rather than need, is not good...[some individuals] can never solve their problems in terms of adaptations because the funding is just not there, or the landlord can just say 'no' to the adaptation. The Welsh Government needs to think about a single, integrated system which has the same rules for all tenures'.

3.2.35 The research findings highlight the complexity and dichotomy of the current system. On the one hand the current system was perceived by respondents to be effective for certain individuals in particular through PAG, ILG and RRAP. However, for those without access to such effective systems, the adaptation process was seen on the whole as complex, unfair and unequal. There was strong consensus that change to the current system was essential, in particular with regards to the DFG, which participants recommended could follow the effective path laid out by the PAG. However, concerns were also expressed that change may impact negatively on the PAG, which many participants were keen to preserve in its current form. Strong voices emerged for maintaining the effective service provided through PAG. Participants expressed the importance of the PAG *not* following the route of the DFG and becoming overly bureaucratic and means tested, while others described how having one *'umbrella organisation that deals with all types of adaptations for all tenures'* could improve matters.

3.2.36 Respondents were also asked their opinions about the time taken to undertake adaptations work. Although some respondents did not feel that there were unacceptable delays in carrying out adaptations, the majority of respondents did. Thus, the overall impression is that delays are an issue nationally.

3.2.37 In addition, some respondents stated that one of the reasons why waiting times varied markedly between areas was due to the fact that different providers measured the adaptation process as starting from different points. When the grant providers were asked as to when the provider regarded the adaptations process as starting, there were varied responses, ranging from 'first enquiry' (35 of 56 responses) to 'when the OT recommendation is made' (16 responses). Five local authority responses stated that they regarded the start point as being the OT recommendation – this is despite Welsh Government guidance stating clearly that the start point should be the first enquiry. Therefore, when the adaptation process is deemed to start does seem to be measured inconsistently; as illustrated by this comment relating to the point from which the time taken for an adaptation is measured:

'First enquiry, in accordance with the Performance Indicator guidance. This is not the case for all LAs, some by their own admission – making comparisons unfair.'

3.2.38 The most common reason cited for delays, by both grant providers and wider stakeholders, was the high demand on the OT service. To reduce demand, some respondents reported an increasing tendency to rely on tenants' self-assessment and accept referrals from other health professionals such as General Practitioners (GPs) in order to reduce delays. Some respondents also felt that the increasing use of Trusted Assessors instead of OTs for minor adaptations, reduces delays and demands on the OT service.

3.2.39 Participants reported that some improvements in delivery have been made, for instance by putting OTs in housing teams and local authorities having their own specific routes for minor adaptations, rather than using the DFG. These have led to reductions in average waiting times in the last few years. However, the most common viewpoint was that the DFG

system is still not consistently working as effectively as it should, as summed up below:

'there are pockets of great delivery and service. Local authorities have put in a lot of effort to improve, but the fact that we still have a lot of variation and that there have been five reviews into this in 10 years suggests that it is not a great system'.

3.2.40 In terms of the DFG system specifically, many respondents viewed inconsistencies and complexities as the system's main weaknesses. Respondents also noted that the system was poorly advertised and that disabled people found it difficult to access the system without prior knowledge or professional guidance.

3.2.41 The means test for DFGs was also seen by many as something that required some change or modification, yet there was little agreement on how it should be reviewed or changed. Some respondents felt it should be removed entirely, but most felt that it could not be removed entirely but could be modified, with consideration given to how, if it were modified, it might apply across all tenures.

3.2.42 Some suggestions for change across all grant streams were offered by respondents such as:

'Councils to provide adaptations across all tenures. This would make sense as OTs provide assessments across all tenures – it's the delivery and funding of the works which varies.'

'Should look at consistency of service. Introduce performance indicators irrelevant of tenure'

'Minor adaptations for all tenures if adequately resourced'

'There should be separate adaptations teams to include all officers involved in the process.'

'To match the best grant for all tenures, e.g. expand the equivalent of PAG across all tenures.'

'Minor Adaptations - one regional pot administered by one team across all tenures, forming links with Health, RSLs, Private Rented Sector'

'not clear why Housing Associations are able to claim specific grants for each adaptation, when local authorities have to fund it through HRA for their stock - would make sense if this changed at same time as authorities retain the HRA.'

'needs to be consistent what is and is not covered - aware of inconsistencies between local authority areas and between landlords on what they will provide - it should not be a postcode or landlord lottery'

'Housing Associations to devolve their PAG services to local authority Grant Agencies. ILG delivered by Care & Repair, works to be controlled by the local authority to ensure consistency.'

The reasons for changes in performance and adaptation delivery

3.2.43 When asked if adaptations budgets/funds had changed within the last two to three years, opinions of grant providers were evenly divided. Those that described no changes tended to describe how funding had been fairly consistent, with budgets staying more or less the same or increasing annually in accordance with the cost of living. The terms 'stable' and 'sufficient' were used to sum up the state of funding and budgets by those who answered 'no'.

3.2.44 Interestingly, some of those that answered 'yes' when asked whether there had been changes to adaptations budgets/funding within the last two to three years, also reported funding increasing annually. These respondents also stressed the important, positive impact of this on services. They described that such increases in funding were crucial in ensuring adaptation work was carried out adequately and in a timely fashion. Both viewpoints stressed the importance of continually increasing budgets, as the implication was that without maintaining or increasing funding, services may suffer.

3.2.45 Others that answered 'yes' when asked whether budgets had changed within the last two to three years, reported a reduction or lack of funding and went on to describe the negative impact of this. For instance, concerns were raised with regards to OT recommendations not being fulfilled due to lack of resources; longer waiting times; and a general disruption to services. More detailed analysis of the grant providers who answered 'yes' to the question about changing adaptation budgets, highlights problems with particular grants and funding streams, which was a concern for certain Care & Repair agencies in particular. For example the RRAP was reported to have a limited budget, with little increases in funding. This meant there was an expectation to 'deliver more for less' as while funding had not increased, the costs of resources such as building materials for instance, were rising.

3.2.46 The ILG and PAG pathways (and fast-track systems in general) were described by many respondents in both questionnaires and in interviews in positive terms, as summed up in the extract below:

'The introduction of ILG funding during 2011 allowed flexibility to innovate and streamline assistance to help tackle local "blockages" in waiting lists for DFGs/adaptations. The DFG process is complex – the ILG was adaptable in elements of the process e.g. simplified means test, does not always require an Occupational Therapy (OT) assessment, contractor selection. ILG funding also reduced the local

authority waiting list for DFGs enabling them to provide DFGs to applicants who were previously further down the waiting list for disabled adaptations. ILG enabled collaborative working with professionals within the Housing, Health and Social Care teams to help to break down traditional barriers to rapid action. OTs' time was freed up within the Borough enabling them to prioritise more complex adaptations and provided cost savings to the local authority DFG budget'

3.2.47 Respondents were also asked how they shared good practice. Most respondents provided examples of how they shared good practice in order to improve performance. Mostly this occurred formally in forums such as:

- All Wales Housing Expert Panel.
- Housing Renewals Managers' Group.
- All Wales Technical Group.
- OT Managers' Meetings.
- Health, Social Care and Housing Forum.
- Plus local examples such as housing associations meeting with accessible housing register organisations.

3.2.48 Sharing of good practice also occurred on more informal levels between colleagues. There were comments around creating feedback questionnaires for service users on the completion of adaptation work in order to ascertain their views on good practice. There was also discussion of the sharing of case studies and service user stories, and suggestions for joint training sessions particularly for OTs and grants officers.

The influences of external factors on delivery

3.2.49 Respondents were asked what external factors accounted for their adaptations performance, both now and in the future. The factor most often cited was resources (cited by 22 respondents), followed by delays

in OT processes (cited by nine respondents). Other factors mentioned by respondents included the need to build strong partnership working; high demand for adaptations; availability of skilled contractors; and delays caused by the statutory process for mandatory DFG.

Conclusions

3.2.50 The following conclusions are derived from the stakeholder interviews and questionnaire survey responses:

Means test/test of resources

- The means test is viewed as a source of inequity, as not all applicants need to undertake one, and the cut-off point for means testing varies across local authorities.
- It was felt that the abolition of means testing would not necessarily lead to a flood of applications (although there is no conclusive evidence for this) and serious consideration should be given to its removal from all minor adaptation works.
- Respondents voiced concern that any changes to certain aspects of the adaptations system could have negative impacts in other areas. For example, creating one single system would potentially involve the imposition of means testing on adaptations in housing association and local authority council house settings, unless the means test were abolished completely.

Consistency of approach

- The minor adaptations limit is inconsistent and inequitable across geographical locations.
- There is inconsistency relating to agency fees, which can vary between five and 15 per cent of cost or be based on a sliding scale
- The current performance indicator is not measured consistently across Wales.

- While framework agreements with contractors can offer consistency and a degree of control, they may not be appropriate for smaller providers or in all areas.
- There are issues around the consistency with which OTs are involved in the provision of adaptations.

Complexity of current system

- The complex differences in provision across tenure is viewed as a source of inequity.
- The menu of grant stream funding provision is highly complex, based on tenure and not need.
- In the currently complex system some respondents felt there may be merit in having a 'chaser' to follow the process through for the applicant on the process.

Systemic delays

- Whilst improvements have been made, delays persist and are often attributed to difficulty accessing OT involvement.
- Time taken for adaptations varies markedly across areas and tenures and is measured differently with different start times for the adaptation being used in different settings, despite clear guidance issued from the Welsh Government.

3.3: Accessing information about the adaptations process

3.3.1 Data about accessing information about the adaptations process was collected via five service user interviews and a desktop review of local authority and housing associations' policies and websites. This was supplemented by the research with stakeholders and analysed into the following themes: accessing information; consistency and accuracy of information; the intended recipient of the information; the means test; service user control; time taken; meeting needs; and funding.

3.3.2 Given the small number of service user interviews undertaken, the analysis can only offer indications of potential issues and not robust conclusions. A wider picture can be gleaned from the inclusion of relevant information from the stakeholder interviews and the desktop review of local authority and housing association information aimed at service users.

Accessing information

3.3.3 Three of the five service users interviewed stated that they had not known how to access information on adaptations. An example of this lack of knowledge of how to acquire information is illustrated by the response by one of the parents when asked whether adaptations were well advertised:

'No – and I work for the local authority and I didn't know about that especially the means tested bit'

3.3.4 Accessing information is also recognised as an issue by most of the stakeholders questioned via the surveys and interviews. Service user access to adaptations was seen as a 'problem area' requiring improvement, yet there were also diverging viewpoints. For instance, those representing the views of grant providers tended to view service user access to adaptations as working well, as grant providers focused specifically on access to their own particular schemes such as RRAP. In contrast, interviewees of wider national umbrella organisations commented on service users' access to information on adaptations more generally, which may explain the differing opinions.

3.3.5 One stakeholder interviewee stated that this was an issue which '*comes up regularly and has been highlighted in all previous reviews*', while another stated that '*it is a complex system and the biggest issue for service users is the confusion, and this causes anxiety and stress.*'

- 3.3.6 The overall view from stakeholders is that information is not clear. This means that there are concerns that vulnerable groups who may not be mobile, may not have access to the internet, or might have particular difficulties accessing information due to sensory impairments may be disadvantaged by poor or inaccessible information provision. Stakeholder interviewees generally felt that it was important for information to be made more accessible and for there to be better understanding among providers of the limitations of some service users in being able to access and understand information (for example, due to sensory loss or other impairments).
- 3.3.7 The desktop review found that it was necessary to have some prior knowledge of adaptations in order to locate information. For example, it was necessary to use a relatively technical term such as 'Disabled Facilities Grant' in order to locate this information on 18 of the 22 Welsh local authority websites. On two websites, no information could be located using the desktop review search terms.
- 3.3.8 Thirty housing associations and LSVT websites were interrogated for information on adaptations. The reviewers also found it difficult to locate information on these sites even when using specific terms such as 'Physical Adaptation Grant'. For example, in the reviewers' experiences 20 of these organisations had no locatable information on their websites, five had basic information and only two had what the reviewers regarded as good information.
- 3.3.9 Housing strategies and renewal policies were all locatable on local authority websites, but they were almost impossible to locate on housing association or LSVT ones. Thus in some instances, policies which should contain more detailed information can be difficult to get hold of, and generally are not available in accessible formats. Whilst it is recognised that such policies would not necessarily be accessed initially by disabled applicants, they would nevertheless be a source of relevant information and should therefore be accessible.

Consistency and accuracy of information

3.3.10 The desktop review highlighted that some of the information communicated by local authorities is inconsistent: for example the age below which DFG means testing applies was variable. Five authorities described the age limit as below 18; five described it as below 19; one stated that it was below 20; five stated that there was an age limit but did not specify what it was, and six did not mention it at all. There were also issues with the accessible information in regards to 'age for DFGs' among the housing associations and LSVTs. Only three of these providers provided correct information, while three provided incorrect information and 24 did not mentioned at all.

3.3.11 The desktop review found that the minimum and maximum grant provision sum is not always communicated and in some instances is stated as being lower than the maximum. Equally some of the information communicated on adaptations begins with the assumption that the disabled person should consider moving home before the providing organisation will consider adapting their property, while other information does not.

The intended recipient of the information

3.3.12 As has been stated in the previous reviews referred to in Section 3, the desktop reviewers found that much of the information on adaptations across local authorities, housing associations and LSVTs assumed that the disabled person was older than 55 and the information was targeted at the older age group. This could imply two things: that old age and disability are synonymous, and that disabled people younger than 55 are not expected to access adaptations.

The means test

3.3.13 The desktop review found that most local authorities (20) communicated the need for a means test for DFG applications. Only one of the housing

associations/LSVTs and three local authorities mentioned the likely timescales for adaptations. Most organisations who mentioned adaptations simply offered information on contacting relevant departments for further information.

Service user control

3.3.14 Findings from the interviews with service users suggested they felt a lack of involvement or control of the process; and that it might be necessary to push for the adaptation or not receive it:

‘But I think you’ve got to be quite pushy – and I am, some people are afraid to ask and won’t push it.’

‘She (the OT) had always been very, very helpful and answered any questions but sometimes I feel like I am not as involved as I would like... I am not sure if that is her or just the process.’

3.3.15 One of the service user interviewees suggested *‘I think if you are not fighting your own corner you perhaps need someone like a social worker to do that for you’* which seems to contradict the desire for more involvement; or may illustrate the difficulty some have in negotiating the adaptations system on their own.

Time taken

3.3.16 In general, all of the service user interviewees commented negatively on the time taken for the adaptation. One interviewee however, who had a replacement lift, did not attribute the time delays to the local authority but rather to the lift company and even described the delay as slowing *‘things down to a pace that suited me’*.

3.3.17 Other comments associated with the time taken to complete the adaptations were:

'It was a bit long and drawn out in the beginning – but when it was started that was in the summer and yet it was done by Christmas and I suppose I thought it would take longer than that'

'in the end you get what you need, and that can only be good. I hope it is faster in the future and maybe less complicated as without the help I would probably not know where to begin.'

Meeting needs

3.3.18 Generally the service user interviewees were pleased with the adaptations outcomes and felt that the adaptations had met their needs.

Comments included:

'The result of the adaptation is fabulous and it's made my life better – given me peace of mind because my child is now safe'

'They get a lot of things right but the little things like getting you out of hospital quick they get wrong'

3.3.19 However, one interviewee, despite having some parts of the home adapted had been put off applying for adaptations in future: *'I was told you can't have a level access shower, this is a family home'*. She explained that she thought this meant the council-owned property would revert to being a family home once she had left it and that was why the adaptation she requested would not go ahead. She also assumed that this was the policy and despite having a deteriorating condition, had accepted this answer which had been given to her eight years before this interview; and had never asked for her situation to be reassessed.

Funding

3.3.20 The service user interviewees who lived in owner occupied homes had to pay towards their adaptations, and although resigned to this, made the following comments:

'Had to pay, not ideal but it is inevitable in current climate. My family also had to contribute to original application too.'

'Funding granted does not cover preparatory works or full cost of decoration which were all applied for'

'I paid for the difference in the tiles and the type of shower and was happy to do that'

Conclusions

3.3.21 The following conclusions are derived from the desktop review:

- Information being communicated to disabled people on adaptations is very mixed in nature and locating the right information requires some prior knowledge of key terms on the part of the applicant.
- Some information could only be located by using a specific technical term such as 'Disabled Facilities Grant' (which service users may be unlikely to know) and sometimes the information could not even be located then.
- Much of the information communicated seems aimed at older people, and while these may make up the majority of adaptation recipients, this could disadvantage younger, disabled applicants.
- Much of the information is concentrated on people with an obvious physical disability or older people, implying that younger people, those with sensory impairments and those with learning disabilities or mental health problems are not seen as potential recipients of adaptations grants.

- Much of the discussion of time taken either to begin or complete an adaptations process (when reported) is communicated vaguely, despite time being the current performance indicator for DFGs.
- The process regarding means testing is not always clearly indicated or described.
- Housing associations do not appear to routinely have policies relating to adaptations available for applicants.
- There are inaccuracies in some information, for example the age below which means testing does not apply and the maximum grant limit, even though these are clearly set out in legislation.

3.3.22 The following issues are derived from the interviews with service users.

This cannot be generalised to all service users given the small number interviewed, but may offer indications of wider issues:

- The adaptations system is complex and difficult to access without help from a professional.
- The service users generally were unaware of how the system worked.
- The service users took a passive role in the process.
- There may be a need for advocacy support services to access the system for some service users.
- The service users were satisfied with the adaptations they received.

3.4: Quantitative data analysis

3.4.1 As discussed in Chapter Two, the intention was to undertake an analysis of data held by providers about the adaptations process. However, due to the lack of availability of suitable individual-level data, the more complex analysis was only completed for a subset of providers.

Limitations

3.4.2 As discussed in more detail in Chapter Two, data at an individual level was only available from nine providers – seven local authorities who provided information about their DFG schemes and two housing associations that provided information about their PAG schemes. It should therefore be kept in mind that the findings presented in this section may not be representative of Wales as a whole.

3.4.3 In total, the nine providers returned data for 4,764 individual adaptation cases. In discussion with colleagues in Welsh Government, it was agreed that whilst noting the limitations of the data, it would nevertheless be worth presenting the existing data even if only in order to provide **indicative estimates** with regard to the duration and cost of adaptations; and assessing the suitability of the existing funding thresholds.

3.4.4 Due to the limited amount of data that was available for analysis and the fact that it was only available for South and West Wales, the reader must note that **the findings presented in this section must be viewed with caution.**

Time and cost

3.4.5 As noted in Chapter Two, different providers collected different kinds of information and when assessing the time taken to complete the adaptation, different providers recorded the start of an adaptation project from different points in the process. For instance, in the case of PAGs, measurement started from the date that an OT referral was received by the adaptations team, while many DFGs started from the point of first contact with the client. Additionally, DFG processes include additional steps not present in PAG processes, such as gaining proof of ownership or landlord consent; and administering the means test.

- 3.4.6 However, despite this variable measuring it was possible to tease out two performance indicators for time taken that are consistent across different service providers as illustrated in Table 3.
- 3.4.7 Overall across the datasets provided by the different providers, there was a great deal of variation in the total time it took to complete an adaptation project and in the total cost of a project.
- 3.4.8 Based on the providers who recorded the total time taken, the mean time taken to complete an adaptation project was 176 days. Other providers split the process into stages and on the basis of this data, projects took on average 87 days to be approved and 56 days to be completed after the approval was given.
- 3.4.1 The mean cost for an adaptation project was calculated at £3,887 and the median cost was £2,723. The difference between the mean and median is due to the data being skewed by the existence of some adaptations costing relatively little, which pulls the mean cost down. It must also be borne in mind that given the limitations noted above, these figures can be seen as indicative only.
- 3.4.2 The figures presented in Table 3 are an overall average so it should be kept in mind that within these averages, there will be variation due to the type and extent of the work undertaken, the location of the service provider and the type of scheme that provided the grant. Using statistical techniques, we have been able to predict to some extent the average cost of particular types of works with this limited information. These predictions are found in Table 5 and onwards.

Table 3: Descriptive statistics for performance indicators

| Variable | Observations | Mean | Median | Min | 25 th Percentile | 75 th Percentile | Max |
|--|--------------|--------|--------|-----|-----------------------------|-----------------------------|--------|
| Input (Money) Grant (£) | 4102 | 3,887 | 2,723 | 10 | 267.71 | 4,619.7 | 61,543 |
| Input (Time) Total project duration (days) | 4102 | 176.57 | 138 | 1 | 66 | 245 | 1288 |
| Time from first contact to approval | 1728 | 87 | 53 | 1 | 19 | 126 | 757 |
| Time from approval to finish | 1743 | 56 | 31 | 1 | 10 | 72 | 624 |

Table 4: Percentage of Adaptations by Type

| Adaptation Type | Number of Adaptations | Percentage of Adaptations ¹ |
|------------------|-----------------------|--|
| Access e.g. ramp | 602 | 12.6 |
| Shower | 1,705 | 35.8 |
| Toilet | 184 | 3.9 |
| Stairlift | 550 | 11.5 |
| Lift | 88 | 1.9 |
| Handrails | 1,024 | 21.5 |
| Extension | 110 | 2.3 |
| Hoist | 41 | 0.9 |
| Misc | 700 | 14.7 |
| Total | 4,764 | |

¹ This will not sum to 100%, as each adaptation project may involve more than one type of adaptation.

3.4.3 In general, major shower adaptations were the most common type of adaptation and most of these were installations of a 'level access shower'.

3.4.4 Table 5 shows the estimated average cost of each type of work on its own. Costs are predicted after controlling for various determinants in a quantile regression model. Rails, mainly consisting of grabrails and handrails, were the cheapest adaptation to provide at an average of £440 per adaptation. The average cost of a shower adaptation was £3,756. The most expensive type of adaptation were home extensions, which on average cost £10,732. However, home extensions were relatively rare, comprising only 110 or 2 per cent of adaptations.

Table 5: Predicted average cost of adaptation

| Type of adaptation | Estimated average cost (£) |
|--------------------|----------------------------|
| Access | 3,090 |
| Shower | 3,756 |
| Lift | 3,555 |
| Rails | 440 |
| Stairlift | 2,602 |
| Toilet | 1,618 |
| Extension | 10,732 |
| Hoist | 2,768 |
| Misc | 517 |

3.4.5 Table 6 below, gives the average predicted time it took to complete the various stages of an adaptation project. As discussed above, the measure of overall time in this data is unreliable so should be treated with caution. Rails appear to be the quickest adaptations to complete, taking just 25 days to approve and 13 days to complete after approval. It comes as no surprise that extensions, also the most expensive adaptation to fund, took the longest time to complete.

Table 6: Predicted time cost of works

| Type of work | Estimated average project duration (days) | Time from contact to approval | Time from approval to completion |
|--------------|---|-------------------------------|----------------------------------|
| Access | 244.4 | 55.0 | 54.6 |
| Shower | 206.9 | 52.2 | 49.3 |
| Lift | 173.1 | 49.5 | 77.8 |
| Rails | 148.4 | 25.1 | 12.9 |
| Stairlift | 192.9 | 42.4 | 44.1 |
| Toilet | 216.6 | 43.2 | 25.6 |
| Extension | 635.9 | 156.0 | 108.1 |
| Hoist | 189.0 | 38.6 | 55.9 |
| Misc | 217.7 | 36.0 | 17.2 |

3.4.6 The results of the statistical analysis also indicate that after considering the type of work and the location of the service provider, PAG funded projects took less time to complete and cost less than DFGs. However, the actual size of this difference is hard to estimate and very sensitive to the quality of the data. We also find that of the various scheme providers, one DFG scheme seems to provide the greatest efficiency in terms of costs and time to implement a project. However, the exact extent to which this may be explained by data quality issues or other factors is unknown. As such, these results should be treated as provisional.

Assessing the suitability of existing funding thresholds

3.4.7 Finally, we used the data to test the proportion of grants which fell below different thresholds. The purpose of this was to examine the likely impact of removing DFGs (up to a certain limit) from means testing. Again, this can only be indicative given the limitations of the data, but when taken alongside the qualitative elements of this review it may help to identify potential impacts of change.

3.4.8 Table 7 demonstrates that just over one-third (37 per cent) of adaptations in our sample fell below £1,000. A further half (49 per cent) cost between £1,000 and £7,000. Only 13 per cent of adaptations cost more than £7,000. Among DFGs in particular, 34 per cent cost less than £1,000; 51 per cent cost between £1,000 and £7,000, and 15 per cent cost more than £7,000.

Table 7: Proportions of cases in terms of grants (by DFG and PAG)

| | ≤ £1000 | £1000-£7000 | ≥ £7000 | Total |
|-------|---------|-------------|---------|-------|
| DFG | 1,320 | 1,983 | 568 | 3,871 |
| | 34% | 51% | 15% | 100% |
| PAG | 282 | 139 | 0 | 421 |
| | 67% | 33% | 0% | 100% |
| Total | 1,602 | 2,122 | 568 | 4,292 |
| | 37% | 49% | 13% | 100% |

Conclusions from quantitative analysis

3.4.9 The following indicative findings are derived from the quantitative data analysis. As noted above, due to the limitations of the data **the findings must be viewed with caution:**

- There was a great deal of variation in the time taken to carry out an adaptation with the mean time taken being 176 days (according to the available data). PAGs appear to take less time to complete than DFGs.
- The limited data analysed for this project suggests the mean cost for an adaptation project is £3,887.
- The limited data analysed as part of this project suggests that among DFGs, 34 per cent cost less than £1,000; 51 per cent cost between £1,000 and £7,000, and 15 per cent cost more than £7,000.
- Overall, a standard approach to collecting data across all providers (if achievable) would result in more effective and accurate

monitoring and evaluation of the impact of adaptations services for the future. Currently, most data collected is held at the aggregate level and is not sufficiently detailed to allow the kinds of complex analysis that would allow better informed findings to be reported.

3.5: Understanding the current system: Conclusions

- 3.5.1 This Review has identified a fragmented service delivery system with no single point of access. There are diverse pathways with a variety of funding streams for different tenures. It appears that funding for adaptations has developed in an ad hoc way in response to wider policy changes, leading to complexity in funding streams as well as eligibility criteria. Delays in the system persist and stakeholders particularly associate these with DFGs, with the starting time for the process calculated in different ways despite clear Welsh Government guidance having been provided.
- 3.5.2 The PAG, RRAP and ILG pathways stood out as simple, quick and effective systems, in stark contrast to the problems associated with the DFG and the complexity of the adaptations system as a whole. There was a widely held view that change to the system was essential in particular with regards the DFG.
- 3.5.3 Means testing only applies to the DFG; and the existing means test is viewed by many stakeholders as being time consuming, inequitable in relation to other funding streams and not necessarily cost effective. There is a lack of consistency around what is classified as a minor or major adaptation with different providers offering differing thresholds, usually based on the adaptation's cost. There is a tendency for some small-scale adaptations to still be delivered through the DFG process and therefore being subject to means testing and possible delays. There was support among stakeholders for a uniform definition of a minor adaptation to be delivered without means testing, freeing up DFGs to deliver more complex adaptations.

- 3.5.4 Around half (33 out of 70) questionnaire respondents were in favour of the idea of pooled budgets but there was little agreement on how such a pooled budget should be administered. There was also recognition that establishing pooled budgets might be extremely challenging in practical terms.
- 3.5.5 There is a paucity of information available to service users about adaptations. The information that is available has an emphasis on older people. Information that is accessible is often complex and inaccessible to people who do not know 'the system'. Service users described difficulties navigating their way through the process and were generally unaware of how the system worked, although most were satisfied with their adaptations.
- 3.5.6 The quantitative analysis, although limited by the lack of available data, suggests that the mean cost of an adaptation project is £3,887, which is higher than most identified minor works ceilings. The mean time taken to carry out an adaptation appears to be 176 days, with a great deal of variance in this figure.

4: Performance indicators

- 4.1 This section will examine the following key areas relating to performance management of the adaptations service, including:
- Strengths and weaknesses of current performance indicators.
 - Usage and value of current performance indicators.
 - Indicative changes to performance management information.
- 4.2 The two questionnaires and the stakeholders' interviews addressed the issue of performance indicators (PIs). There was also some discussion of this topic at the four stakeholder workshops held across Wales. The desktop review also looked at the information that providers communicated to potential service users on their PIs.

Findings

- 4.3 Stakeholder views on PIs varied but the majority of respondents to the questionnaires for example, felt that measuring performance needs to be reviewed. The effectiveness of delivering adaptations is seen to be dependent on the funding stream, with the DFG appearing to be more of a problematic area than the PAG, for instance.

Context and strengths of current performance indicators

- 4.4 The present National Strategic Indicator (NSI) is PSR/002 (PI 7) under the headline 'Timing of Disabled Facilities Grants: *The average number of calendar days taken to deliver a Disabled Facilities Grant*'. This PI only applies to local authorities who deliver a DFG-funded adaptations service.
- 4.5 Welsh Government/Statistics for Wales has produced NSI guidance 2013/14 for local authorities, which sets out the scope of the PI and includes a statement on when DFG delivery should be counted as commencing:

*‘The number of calendar days taken to deliver a DFG should be counted from the date of the client’s **first recorded contact** with the local authority, relating specifically to an adaptation, for which DFG is subsequently offered to the “certified date”. Alternatively, in the case of an existing client, the starting point should be the date on which the need for an adaptation for which DFG is subsequently offered is **first raised, either by the client or the Authority**’ (our emphasis)*

and

‘Local authorities must include the number of calendar days taken to complete all the stages of the DFG process, from the first recorded contact with the client relating to the DFG. Where applicable, this should include the following:

- *Occupational Therapist assessment.*
- *Sending grant application form to client.*
- *Completed application form being received by grants section.*
- *Formal approval notice being sent to client.’*

4.6 The research team considers that a key strength of the current PI is that it is well-established and relatively straightforward to measure and report upon. However, this assumes that the supplementary guidance quoted above is adhered to and implemented correctly, and efficient recording systems are in place to marshal targeted information, analyse and disseminate it. Our qualitative and quantitative research suggests that not all local authorities are adhering to the guidance, and therefore return of data on this PI is inconsistent. If PI data is not sufficiently robust and not gathered consistently, planning information for future delivery of adaptations services may be compromised.

4.7 Another strength is that adopting a single PI rather than a set of PIs or sub-PIs, acts as a clear focal point for information-gathering and reporting for local authorities.

Lack of consistency of approach of current PI information gathering

4.8 As noted in paragraph 3.2.37 above and partly evidenced by the quantitative data analysis, the currently required process for reporting on the PI for DFGs of *calendar days taken to deliver an adaptation* was perceived by research respondents as being problematic – the start point for timing being interpreted differentially by different local authorities. This is despite the NSI guidance clearly specifying when the calendar days should be counted from, for both new and existing clients. Several stakeholders suggested that some authorities were deliberately ignoring the guidance because reporting the PI accurately would make performance look very poor.

4.9 Many workshop participants agreed that measuring the impact on clients and satisfaction levels post-adaptation would add value to the current PI regime, which was seen as too reductive.

‘Clients are happier with outcomes rather than time – the PI system is not client driven’.

4.10 The desktop review found that little attention was given to providing information to service users on *time taken* for an adaptation, even though for the DFG this is the key PI. Of the 22 local authority websites reviewed, only two mentioned DFG timescales and this was in relation to paying back the grant should the applicant subsequently move home.

Insufficient detail of key elements of DFG delivery process

4.11 The current national PI, as noted above, is restricted to counting delivery time of DFGs from a specified starting point in terms of calendar days. There is no requirement to report on DFGs by other indicators or sub-indicators such as type of adaptation, cost of adaptation or impact of adaptation, all of which could provide valuable planning data for local authorities and contribute to the formation of a national data map for Welsh Government. This issue is discussed in more detail below.

Lack of performance data on impact and value for clients

- 4.12 Some respondents made suggestions for more cost-benefit analysis, and for more outcomes-focused monitoring. It was felt that having one database to collect and record all data would be beneficial, rather than having separate monitoring systems for different schemes and areas.
- 4.13 Some workshop participants felt any new PIs would need to take service user outcomes and impact and customer satisfaction into account, as well as time taken and not be too complex to collate.

Limited scope of having one National PI for DFGs only

- 4.14 Some questionnaire respondents felt that the current PI system is unequal since local authorities are the only grant providers that have to report against it. Some respondents suggested that all adaptations providers should have to supply PI information in terms of calendar dates in addition to other data. Greater transparency and openness with regards to performance target measures and waiting times was also suggested.
- 4.15 Other examples were given of how the limited *time taken* measurement can be used to scrutinise an organisation unfairly and produce unintended negative outcomes for clients:

'Having league tables causes people to cheat, it's human nature. If you have attention paid to you because you perform in a certain way you look at a way around that, rather than look at providing the right help. That is why we are against Key Performance Indicators and that is why we choose to use measures. It is a different word, but probably means a similar thing, but what they are used for is the important thing.'

Use and value of current performance indicators

- 4.16 Many questionnaire respondents felt that the data collected on waiting times and delays did not show a true picture of what was happening on the ground, and therefore measurement and monitoring systems needed to be changed to better reflect reality. An example was given of how one complex or problematic case could skew the data, therefore change was needed to ensure that the information collected on delivery times was more meaningful and accounted for such complex cases. It was also argued by some respondents that the PI creates an incentive to put all minor adaptations through the DFG route since this would tend to bring down average delivery times.
- 4.17 Some local authorities argued that it was unfair to be held accountable to a PI when performance was at least partly defined by other agencies or individuals. For example, delays might be due to OTs external to the Housing Renewal team.
- 4.18 Some interviewees described how in their local authorities they broke the PI time span down into chunks of time with explanations as to why certain chunks took the time taken, rather than the overall figure which they send to the Welsh Government:

‘So when we submit them to Welsh Government that is all they are seeing, the global figure not the breakdown.’

Indicative changes to performance management information

Going beyond one National PI

- 4.19 If the single National PI is retained, some respondents felt that it could be supplemented by a number of other indicators that will provide valuable information. Data Unit Wales will be piloting a project that will examine the feasibility of significantly expanding upon the current one National PI for DFGs. It will require local authorities to submit data on 23

sub-indicators, which will cover detailed elements of the delivery process such as key milestones in the DFG calendar; value of DFGs by type of adaptation; spend categories; low cost adaptations; and distinguishing between children and adult clients.

- 4.20 The outcome of the pilot will be useful in informing how local authorities are likely to respond to expansion of the current PI, and how the benefits of collecting useful planning data on DFGs is balanced by the potential burden of resourcing the data collection process.
- 4.21 It is difficult to recommend ways of creating more consistency in PI reporting. Establishing a nationally consistent approach to the lower DFG threshold will assist in some ways, although there does not appear to be a way of guaranteeing that local authorities will follow guidance on defining the DFG process start point.

Implications of measuring performance across different agencies

- 4.22 Currently, the National PI for DFGs is restricted to local authorities. Arguments have been made by many respondents during this research project about the need to broaden out and include RSLs and Home Improvement Agencies in the National PI regime to ensure that performance is monitored consistently across the board.
- 4.23 Although the processes for providing adaptations are different due to various factors such as the necessity of gaining landlord consent, it was felt by some respondents that measuring all providers according to the same PI would encourage more consistent timescales and greater equity between tenures.

Customer focus and impact

- 4.24 Some respondents to both questionnaires and interviews described measuring customer satisfaction as a potentially important element of the PI system:

'We provide a customer satisfaction form at the end of the grant. Looking at changing the questionnaire. It covers two main areas: 1) Customer application for grant and 2) The outcome for the client.'

- 4.25 The recent trial of a national customer satisfaction form across all local authorities was seen as a positive move, although authorities reported they would also continue to gather their own data.
- 4.26 There appears to be some interest amongst some local authorities to focus on PIs relating to both delivery times (in order to reduce delays), and also to measure the impact of adaptations on the lives of clients in a more qualitative way. Adopting a twin-track service-focused and user-focused approach to PIs could provide valuable planning data to form a national data map as outlined in 4.11 above, with the end result of strengthening focus on achieving positive outcomes for service users.
- 4.27 Welsh Government has recently been in discussions with Shelter Cymru and other stakeholders over the potential for a new service user-focused performance indicator for homelessness prevention services. Although still in the very early stages, there may be potential for this work to demonstrate how user-focused performance measurement might work in practice.

Conclusions

- 4.28 The way in which PI information is currently collected is not consistent across the 22 local authorities in Wales, despite clear guidance issued by the Welsh Government. It was suggested by some stakeholders that some local authorities are deliberately ignoring NSI guidance in order to make delivery times look better. There does not appear to be a way of guaranteeing that all local authorities will follow the NSI guidance. However, it should be possible to create more consistency by establishing a single national approach to the lower DFG threshold.

4.29 The current PI is felt by many respondents to be too reductive. Positive outcomes are seen by most respondents as more important to service users than delivery times. There is interest in supplementing data on delivery times with client-focused measures, such as customer satisfaction data and/or qualitative information on the impact of adaptations on applicants' lives.

4.30 Many research respondents argued in favour of a single performance reporting regime that included RSLs and other agencies as well as local authorities. Although the PI would be measuring different processes, it was felt that this would encourage more consistency and more equity between tenures.

5: Options for change

5.1: Stakeholder views

- 5.1.1 In order to explore the feasibility of delivery change, a series of four workshops were held across Wales with a wide range of invited stakeholders. A total of 67 participants attended, broken down as follows: one workshop in Abergele (10), two in Cardiff (41) and one in Aberystwyth (16). All participants were experienced practitioners working in the field of adaptations and ranged from local authorities and housing associations to OTs and third sector disability organisations.
- 5.1.2 Additionally, five follow-up interviews were carried out with six key stakeholders with extensive knowledge of the adaptations system, in order to examine in detail the implications of the options for change.
- 5.1.3 A series of change scenarios were discussed by participants. The scenarios were based on emerging issues from the contextual review, questionnaires, interviews, quantitative data and desktop review, and created to instigate discussion and elicit opinions about potential options for change. A full list of the change scenarios discussed is included at Appendix 5.

Defining ‘major’ and ‘minor’ adaptations

- 5.1.4 Currently, there is no national performance standard or statutory definition of what constitutes a minor adaptation, although Welsh Government guidance NAW 20/02 recommends a threshold of up to £3,000. The Review found that there is a varied approach by different agencies and local authorities as to how they define minor adaptations, with consequences for how the systemic split between minor and major adaptation systems is managed.

- 5.1.5 There was a high level of consensus in the stakeholder workshops and stakeholder interviews that a consistent cut-off point should be set for minor adaptations, and that limit should be no more than £1,000. Minor adaptations can be delivered very quickly because of their straightforward nature and participants felt that if the threshold for minor adaptations were set too high, this could potentially slow down delivery.
- 5.1.6 Some participants suggested that a tiered system of minor, middle and major adaptations could be determined either by cost or by tiered need.
- 5.1.7 Views were expressed about the emphasis on the key purpose of minor adaptations – rapid and efficient delivery. Consequently, removing the requirement for a test of resources should be a key element of any definition of a minor adaptation.
- 5.1.8 There was a degree of consensus that there should be a Wales-wide performance standard and national definition of a minor adaptation across all tenures and delivery organisations.
- 5.1.9 Participants in workshops and interviews said:

‘Perhaps the criteria for the minor adaptations’ financial limit should be set by type of work, rather than cost e.g. access to property or maybe the function of the adaptation is the issue.’

‘If done correctly and it replicates current good practice, like recycling products and having one funding pot – it could be a big money-saver’

‘A three tier system might be better – minor, middle and high level adaptations’

Merging funding streams

5.1.10 Many participants saw the pooling of funding streams as desirable, but that there would be challenges around who would be responsible for implementing and managing a single funding route to adaptations. It was also felt that pooling existing budgets could be a difficult and complex process. A substantial number of participants felt that pooling budgets was probably too difficult to achieve in practice.

5.1.11 Some participants expressed concerns about risks that funds may not be distributed equally under a single grant regime, and that not differentiating carefully between fast track minor adaptations and more complex adaptations could create unintentional delays. Other participants feared that a unified funding system might gravitate applicants towards a 'lowest common denominator', meaning that some applicants who today can get adaptations carried out relatively quickly might have to wait longer. Some had concerns that if a single pot were to be held by local authorities, the process would end up reflecting the current DFG system rather than the more responsive PAG process. Some RSL participants also expressed concern about the loss of control over adaptations budgets.

5.1.12 Some OTs expressed the view that a single funding source would be easier for clients to understand and could make the assessment process more streamlined and efficient, particularly if it also meant a single point of access. Others felt that the structure of funding regimes have little direct impact on the lives of clients. The view was also expressed that the current wide range of funding streams acted to relieve pressure across the system, meaning that many applicants were able to have works completed more quickly than would be the case under a single system.

'I am not a defeatist but I am a pragmatist and I don't think you will ever actually have pooled budgets in a single pot with a single access point irrespective of tenure.'

'A single access point for the client is required... whether private/council/DFG etc. It would be less complicated but also able to correspond with equality across the board... and everyone would follow the same steps and procedures and be able to use the process, regardless of what department or area of tenure they apply for funding through.'

'If you did introduce a single system, in my opinion what's likely to happen is people who can now expect a quicker service are likely to have a poorer quality of service. You will be dragging people down.'

5.1.13 Some participants discussed the role of Health as a service which benefits financially from adaptations without contributing anything towards it. These participants felt that Health should contribute strategically towards any single pot of funding. One participant noted that if adaptations were seen as a Health service, they would be free for all: *'Should we charge older and disabled people for an essential service that promotes independent living and reduces the need for costly residential care services?'*

5.1.14 Some participants suggested that local authorities would be suitable agencies to hold a single pot. It was pointed out that local authorities already have the statutory responsibility for adaptations in the majority of local housing stock. Some authorities deliver adaptations for LSVT housing associations, meaning that a single system is in effect already in place in those areas. One participant said that most authorities already have good relationships with RSLs in their areas, which would make a transition to a single system easier.

5.1.15 However the issue of hypothecation of funds was raised – if the adaptations budget was unhypothecated, as is the case for most local government funding, there would be no guarantee that the money would be spent on adaptations. In the current financial climate, some participants felt there was the risk that it would be spent on other service areas. Some felt that hypothecation may be resisted by local authorities, however – and there would be a risk that budgets could run out mid-year.

‘If by some miracle you got over the issues of how to distribute it between different tenures and different groups, what happens if the money runs out before the end of the financial year?’

5.1.16 Care & Repair agencies were also suggested as potential holders of a single pot. Many participants stated the view that Care & Repair agency staff demonstrate good person-centred values in their work, are used to delivering quickly and working in partnership. In this scenario, the local authority’s role would become more of an enabler – commissioning services and regulating performance rather than providing adaptations directly. Authorities could take a strategic rather than operational perspective, brokering partnerships with housing, social care and health. However, it was acknowledged that there could be risks involved in taking delivery away from local authorities. Participants felt that local authorities needed to retain the statutory responsibility for DFGs.

Reviewing the DFG means test

5.1.17 There was a high level of agreement on the need to review the meanstesting system, although no agreement that it should be abolished. There was a fear that removing means testing might encourage wealthier people to apply for adaptations grants even though they would be able to afford to fund works themselves.

5.1.18 Means testing was described by many participants as a barrier that can prevent some people from getting the adaptations they need.

Participants stated that some people are deterred from making an application because of the means test, while others may be deemed to be able to afford more than they actually can.

5.1.19 There were differences of opinion on the administrative burden of the test. Some participants felt that the test is complex to administer and requires lots of documentation from the applicant. Others reported that the test actually takes very little time to carry out, provided the authority has appropriate staffing levels and an agency service in place to fully support applicants to gather documentation together.

5.1.20 It was generally acknowledged that the vast majority of means tests do not result in any contribution from the applicant. There was a view that the expense of administering the means test did not justify its outcome, and therefore meant that the cost of administration equalled the cost of any contribution by the client. However, one participant stated that the deterrent effect of the means test justified any administrative burden, since to take the means test away could mean '*opening the floodgates*'.

5.1.21 There were differences of opinion on what the impact on demand would be if the means test were removed. Some stated that the removal of the test had had little impact on demand for children's adaptations, while others stated that increases had occurred. One participant said that it led to more speculative applications, more refusals and more appeals, all of which carried an administrative burden for the authority. It was felt that the only way to properly understand the impacts of wider removal, would be to trial it.

5.1.22 Most participants felt that means testing should be removed for all minor adaptations (however defined). Many participants also argued in favour of abolishing means testing for mid-level adaptations. However, others felt that means testing was necessary in order to ensure that scarce public resources went to those least able to afford adaptations themselves. Some participants also felt that means testing should be

applied in a more consistent way across tenures, including for social tenants: *'The (private rented sector) now has some of our most vulnerable people living there, is it fair that they should face a means test whereas a social tenant who might be financially better off doesn't get tested?'*

5.1.23 There was discussion about the potential to redesign the means test to include an assessment of the applicant's outgoings, which would take into account the extra costs of living with a disability. Some participants felt that there needed to be more options in place to assist people to meet their contributions, to avoid them having to source private finance on the open market. This could include, for example, equity release.

'There should be a means test but we require an altered and fairer means test'

'if the means test stays there should be more options to assist people to meet their contributions'

Increasing the current DFG upper limit

5.1.24 The Review found that the issue of larger adaptations was dealt with differently in different locations, with some authorities using discretionary powers to top-up the limit while others did not do so.

5.1.25 Some participants felt that the £36,000 DFG limit was too low, while others felt that it was just about right. Some felt that raising the limit too high might have the effect of stifling *'more creative responses'* since it might create a temptation to carry out ever more expensive adaptations, rather than looking closely at a person's situation and what they really need. Beyond the DFG regime, it was noted that for RSLs there is currently no upper limit on PAGs, which it was felt gives rise to inequality of provision between tenures.

5.1.26 Discussions suggested that service users who need adaptation works beyond the £36,000 ceiling would either not have the essential work completed, or would have the resources and financial status to top-up the costs or take out a loan to cover this work. This could lead to inequalities between cash-poor but asset-rich owner-occupiers (primarily older retired people with limited income), and some disabled people who may have a reasonable income and therefore access to credit sources.

5.1.27 Some felt that applicants needed to be able to access more forms of affordable finance to top-up DFGs – this could include for example equity release or Home Improvement Loans.

Fees for agency services

5.1.28 There was confusion expressed over why fees varied across Wales. There were some concerns over the size of the fee with PAGs being seen as set at 15 per cent and others at 12 per cent or lower and some using a sliding scale.

5.1.29 It was decided that if there were to be a fixed fee, there needed to be the same type of agency service provided across Wales. The agency service and function would need to be clearly defined and subject to national standards and performance management criteria.

5.1.30 However, there were opposing views expressed on whether there should be a fee at all, and if so what that should be, and whether it was possible to develop a national fee structure due to regional and local needs determining service provision. Other workshop participants felt that fees should be set according to the size and costs of the works. *'It is a critical service so should not have fees, especially as if you add this to the building charges of 15 per cent for example - it is too high.'*

'Years ago the fee was a basic flat fee of £500 or if under this then no fee, and if above this it was on a sliding scale.'

'If under £6,000 then no fee, £6-10,000 6-8 per cent and £10,000 plus 10-12 per cent'

The use of framework agreements

5.1.31 The issue of framework agreements had arisen in the questionnaires and interviews with stakeholders, as there were differences in the way in which they were or were not used. There was some agreement amongst participants that framework agreements could be used locally or regionally but that it would be very challenging to set these nationally.

5.1.32 There was a view that using a stable of approved local contractors was the best policy as they delivered to specification, which was sometimes not the experience with large national volume contractors. Using a sole contractor was viewed as problematic as it was argued it could lead to price fixing. Comments associated with this were:

'If (we) had a few basic frameworks it would be OK but again geography, contract costs and budgets stop this being easy.'

'Agreed that consistent frameworks should be used in local areas but not feasible to roll this out nationally'

'Have a national framework - but sort this out in bands, in that way you could prohibit non-local builders bidding for particular jobs below a fee level'

OT involvement

5.1.33 There was general agreement that the involvement of OT services should be triggered by the needs of the client and the complexity of a case, not triggered solely by the cost of the adaptation. Even 'minor' adaptations might sometimes need OT expertise.

5.1.34 There was agreement that the 'Trusted Assessor' role should be more widely used to relieve and reduce OT waiting times, assuming Assessors had been correctly recruited, trained and supervised, and there was a commitment to their continuing professional development. It was noted that the College of Occupational Therapy guidance 'Minor Adaptations Without Delay' (COT, 2006), sets out a clear framework for when Trusted Assessors can be used instead of OTs. It was also noted by one interview participant that Trusted Assessors can be trained at an affordable rate – there is an accredited course approved by COT that can train a Trusted Assessor to specific competency levels for less than £500.

5.1.35 Many participants noted that OT Assistants are already fulfilling the Trusted Assessor role in many cases. However, some doubted whether all OT Assistants have had the right training and experience to reach the full potential of the Trusted Assessor role. One participant voiced the concern that OT Assistants' assessments were not always carried out to an acceptable standard, which could lead to further work in having to undertake the assessments again.

5.1.36 In order to determine whether there is a need for the professional input of an OT, some participants felt there would need to be screening undertaken by a qualified, experienced person. The use of call-centre screening was not thought to be appropriate for adaptations services, although one participant noted that a local authority in Cornwall uses a call-centre system to run initial assessments and applications for minor adaptations, with a high success rate.

Appropriately targeted adaptations information

5.1.37 The issue of appropriately targeted adaptations information arose from the desktop review. There was general agreement among workshop participants that information for families, children and working age disabled people needs improvement.

- 5.1.38 Empowering all service users through accessible information was agreed by many participants to be important. Information on the adaptations process should be consistently produced for all-Wales consumption, with supplementary information produced to meet local need.
- 5.1.39 Some participants identified a deficit of information aimed at children and families. It was also felt that well-drafted and well-designed information should be accessible for all audiences. Information could be jointly developed between local authorities, Care & Repair agencies and housing associations to target a cross-tenure audience.
- 5.1.40 Some participants were concerned that raising awareness of adaptations services would consequently raise expectations and potential demand, and that strategies would need to be developed to manage this anticipated outcome.

Adaptations team structures

- 5.1.41 Some participants discussed the benefits of a 'one stop shop' approach, which was seen as working well in settings where such a team existed. For example, OTs and grants officers working together closely could produce more efficient outcomes and reduce delays. Some participants felt that wider use of 'one stop shops' could potentially lead to a simpler 'front end' without the difficulties of merging funding streams. While Welsh Government guidance NAFW 20/02 already recommends one stop shops as good practice, several participants noted that it is not possible to force local authorities to adopt good practice.
- 5.1.42 Several participants pointed out that in some areas local authorities are already *de facto* single points of access where they are providing adaptations on behalf of LSVTs: *'Best practice is having housing staff and OTs within the same team, and having a clear single point of access to that team irrespective of tenure.'* However, it was also felt it

would be more difficult to justify making the local authority the single point of access for a whole authority area where social landlords delivered their own adaptations through PAG.

5.1.43 Some felt that operating within a team would narrow the skillset of the OT to just adaptations, and could cut the OT off from consulting with other OTs in other departments. It may be feasible to establish virtual teams with some face-to-face presence to ensure team cohesion.

5.1.44 Others felt that there was simply a need for better communication – for example having different teams located in one building but communicating effectively could have a positive impact on delivery.

Any other issues

5.1.45 Participants raised the issue of ensuring best use of existing adaptations. Some stated that some areas in Wales still do not have a fully functioning Accessible Housing Register and as a result, social landlords were removing adaptations quickly after properties became vacant in order to make housing available for general needs. Social landlords are under pressure to prevent voids and this can lead to adaptations being removed that could potentially be used by a new disabled tenant. An example was given of one housing association taking out some £22,000 of adaptations (that had been funded through DFG) not long after they had been fitted, in order to put the property back on the general needs list, after the original applicant's situation had changed so they were no longer able to live independently.

5.1.46 There were good practice examples highlighted where some local authorities have stairlift schemes which enable straight stairlifts to be fitted quickly, without means testing, typically being installed within a few weeks. Stairlift equipment is recycled back into the system. This was seen as a good way of relieving pressure on DFGs.

Conclusions: emerging themes from the workshops and interviews

5.1.47 As with the findings from other elements of this Review, there is a lack of consensus on a number of key elements. However, there is clear support for a national definition of a minor adaptation to apply across tenures and delivery organisations. Many participants also felt that adaptations that fell within the agreed definition should not be subject to means testing, to assist efficient delivery. The options that emerged from these elements of the research were:

- A national definition of a minor adaptation should be set at £1,000.
- Minor adaptations should be excluded from means testing.
- A minor adaptation could be the lowest cost element of a three-tiered approach to defining adaptations.

5.1.48 There was some support for a unified cross-tenure adaptations system, and a view that this could lead to better, more equitable outcomes for service users. However, participants acknowledged that defining a single system and merging funding could be extremely difficult in practical terms. The following options emerged from these elements of the research:

- Pool existing resources to create a single funding pot to be delivered cross-tenure by local authorities or Care & Repair agencies.
- Alternatively, retain funding in different locations and focus on other ways to create better equality of outcome between funding streams.

5.1.49 Many participants agreed that the means test needs to be reviewed, although whether it should be abolished altogether was a source of contention. Some participants expressed fears over the financial implications of removing the test, while others maintained that the cost of administering the test outweighed any eventual financial contributions from households. The options that emerged from these elements of the research were:

- Removing means testing for all minor adaptations.
- Removing means testing for all adaptations across all tenures.
- Redefining the means test to address perceived shortcomings in the current test.

5.1.50 There was a consensus around the need to free up OTs to concentrate on more complex cases. The following options emerged from these elements of the research:

- Applications should be initially assessed via a professionally staffed screening/triage service.
- OT assistants are capable of fulfilling the 'Trusted Assessor role' provided they are appropriately trained and supported.
- The use of dedicated multi-disciplinary adaptations teams was identified as good practice.

5.1.51 There was general agreement that information for applicants needs to be improved, with discussion focusing on the following options:

- Accessible information on the adaptations process should be consistently produced for all-Wales consumption, with supplementary information produced to meet local need.
- A deficit of information aimed at children and families should be addressed.
- Concerns about possible over-demand for services through promotion of adaptations should be addressed and a national communications strategy developed.

5.1.52 There were suggestions on how to make best use of existing adaptations:

- Some areas still do not have fully functioning Accessible Housing Registers and this was perceived as leading to public money being wasted because of the pressure to make housing available for general needs.

- Some authorities operate stairlift schemes which are delivered outside of DFG and therefore can be delivered very quickly. Stairlift equipment is recycled back into the system.

5.2: Options for change: analysis

- 5.2.1 In analysing the options for improving adaptations delivery, there are three overriding factors that the research team considers need to be taken into account. First and foremost is the immeasurable importance that the service has for the lives of the often very vulnerable people who access it. The way in which adaptations are provided has the power to transform people's lives for the better or for the worse. This means it is critical to ensure that the service delivers as effectively as it possibly can. It also means policymakers have a responsibility to undertake any systemic reform with extreme caution.
- 5.2.2 The second factor is related to the high level of complexity in the current system. As responsibility for adaptations has grown in a fairly organic way around different funding streams, the system is today quite finely balanced in many ways. While this complexity is not necessarily an insurmountable problem, it does tend to increase the risk of any reforms creating unintended consequences.
- 5.2.3 The third factor is the current financial reality which means that any costly change is simply not likely to be feasible. As such, our recommendations have focused on what is financially realistic using existing delivery mechanisms wherever possible, and with an eye towards medium and long-term service transformation.
- 5.2.4 This section firstly looks at some key areas of debate before going on to outline three options for change that have been developed with reference to the evidence gathered during this Review.

Key areas of debate: complexity in the system

- 5.2.5 Many stakeholders felt that the level of complexity in the system is unacceptable because it leads to inequality between applicants from different tenures in terms of waiting times and costs, and because it is difficult for service users and providers to navigate. An alternative view was also expressed that this situation is an inevitable reflection of the fact that housing is itself complex and is funded in complex ways. According to this view, the existence of many funding streams is actually beneficial since it relieves pressure across the system, meaning that *at least some* people get adaptations delivered relatively quickly, rather than everyone having to wait an equally long length of time.
- 5.2.6 The Review team considers that the system ought to deliver equitably and it ought to appear to be straightforward from the perspective of the user. The level of 'back office' complexity does not necessarily need to be a significant issue. The evidence gathered as part of this research leads us to conclude that equity and consistency from the point of view of the service user is a more important objective than simplicity.

Key areas of debate: the quality of evidence

- 5.2.7 In analysing options for change it is important to acknowledge that by and large, local authorities have made considerable efforts to improve DFG delivery in recent years. According to the National Strategic Indicator, the Wales average for delivery of DFG is 239 days, down from an average of 387 days in 2010/11 (NSI, 2013/14). There is wide variation within this with the lowest at 156 days and the highest at more than twice that figure, at 326 days. However since the indicator is measured in different ways by different authorities, it is difficult to make any definitive statements about DFG performance, other than to note generally that waiting times appear to have improved.
- 5.2.8 Throughout this Review, we have noted a lack of good quality data on adaptations across all funding streams. Only nine organisations were able to supply quantitative data to our researchers. No organisations

were able to supply equality data, which has hampered our understanding of who is benefiting from the current system. Currently we cannot tell if any groups (other than disability) protected under the Equality Act 2010, are being either positively or adversely affected by the current processes in place for administering and delivering adaptations. This means we cannot ensure that there is no unintentional bias within the current system. The desktop review noted that very few grant providers offered information in community languages and there was a considerable age bias, with incorrect information often given in relation to means testing and for younger people. However due to lack of equality monitoring data, we could not investigate the impact this might have on people accessing the service. In order to understand the extent to which the current system is fair, transparent and open to all, we suggest that this data gap needs to be addressed.

Key areas of debate: the means test

5.2.9 A lack of evidence has also weakened the level of debate around the relative costs and benefits of the means test. During this Review stakeholder views were diverse, ranging from describing the means test as an expensive administrative burden that costs more than it saves, to an essential 'gatekeeper' without which costs and waiting times would spiral out of control.

5.2.10 Different authorities carry out the means test in different ways, which makes it difficult to estimate how much an average authority might spend on administration. Jones (2005) found that time taken to approve grants, including conducting the means test, was an average of six weeks. Many stakeholders in this Review stated that the test was time-consuming and complex to administer, while some local authorities stated that the means test itself actually took very little time to carry out, provided that authorities had a full agency service in place to support applicants to gather the required documentation in a timely way. However, all agreed there was potential for significant delay in the

process when individual applicants are relied upon to locate and provide relevant information themselves.

5.2.11 Most stakeholders asserted that the vast majority of means tests did not result in the applicant having to make a financial contribution to the cost of their adaptation. Data collected by the Welsh Government shows that 91 per cent of all DFG grants completed in 2013/14 were fully funded with no applicant contribution.

5.2.12 Even if the full administrative costs were known, however, it would still be problematic to assign a potential cost to the removal of the means test since it is not known how many additional people might apply if it were removed. Some stakeholders felt that most people would want to avoid coming into the system if they could possibly afford to pay privately, while others felt that most people would 'have a go' at getting adaptations for free before going private.

5.2.13 The evidence around the removal of the parental means test in 2005, suggests that there was some impact on application numbers. Research by Shelter Cymru and Contact a Family (Mackie *et al*, 2008) found that the removal of the parental means test led to increases in enquiries and completions in Wales and Northern Ireland. Between 2005 and 2007, completions of children's adaptations increased from approximately 50 to 180 in the 11 Welsh authorities surveyed. Similar patterns were noted in Northern Ireland.

5.2.14 During our Review, many stakeholders felt that the impact on children's adaptations had been small, despite fears voiced before the test was removed. Others felt that there had been an impact on demand. One stakeholder argued that the impact could not have been very significant since local authorities did not request any additional funds from Welsh Government to meet the costs of removing the test. Any additional resource burden was absorbed by existing budgets.

5.2.15 While it seems likely that the removal of the test had at least some impact on demand for children's adaptations, caution should be taken in drawing any conclusions about the implications of removing the test more widely, since children's adaptations account for only a small proportion of DFGs overall – less than 5 per cent in England according to the Building Research Establishment (BRE, 2011).

Key areas of debate: universalism vs prioritisation

5.2.16 Regardless of the evidence on removing means testing, there is still the principle that public money ought to be spent in ways that maximise the public good. Existing levels of DFG spending would have a greater impact if money were skewed towards delivering the actual adaptation works, rather than meeting the costs of administration. By helping as many people as possible, the funding stream then has the greatest chance of realising the many proven financial and social benefits of adaptations – reduced costs to health and social care, and increased economic activity.

5.2.17 The Welsh Government has a longstanding commitment to what Mark Drakeford AM has described as '*progressive universalism*' (IWA, 2006) – leading to policy initiatives such as free prescriptions and free bus passes for pensioners. Progressive universalism means that services should be free at the point of delivery to all who need them, regardless of their financial status. Means testing is not generally regarded as compatible with this principle.

5.2.18 Throughout this Review stakeholders debated the relative merits of providing a universal service to all who need it, or providing a service which prioritises access to those least able to afford the costs without help. There was also debate about how we should categorise adaptations, with some stakeholders noting that if adaptations were seen as a health service the principle of universality would be assured.

5.2.19 Many local authorities in Wales have already experimented with delivering certain mid-level adaptations outside DFG. Several authorities have introduced stairlift grants which provide straight stairlifts within short timeframes, without means testing. The stairlifts are recycled back into the system which keeps costs down, and the fact that these are delivered outside of DFG means that the service can be very responsive, being completed typically within a few weeks.

5.2.20 Some stakeholders described how the means test has 'quirks' which can discriminate against certain types of applicant because of the way it is designed. It was also described as a barrier that prevents some people from accessing much needed adaptations. There was evidence that some authorities are putting low cost adaptations through DFG, creating an administrative burden that is out of proportion to the cost of the actual works. The way the performance indicator is measured creates an incentive to include low cost adaptations in DFG in order to bring down average waiting times – the lowest local authority threshold this research found was just £200.

5.2.21 If, as some stakeholders suggested, the means test leads to some people who need adaptations going without, there are wider costs associated with this. Research by Cardiff Business School (LERC, 2010) found a high correlation between receiving a DFG and an average delay in admission to residential care of four years. A study from 2010 estimated that the risk of falling reduced from 32 per cent to 10 per cent among those whose homes had been improved by Care & Repair (O'Leary *et al*, 2010). There is also the often cited evidence from Care & Repair Cymru which estimates that every £1 spent on RRAP, leads to £7.50 in cost savings for the NHS and social care (Care & Repair Cymru, 2011). Removing the means test is likely to lead to fewer people going without adaptations they need, and this could create savings for Health and Social Services.

5.2.22 Although there was a broad consensus that at least some level of adaptations should be removed from means testing, the evidence from stakeholders in this Review strongly suggests that there are considerable risks involved in opening up universality too widely, too quickly, at a time of public spending cuts. The consequences could include: less money for adaptations overall; much longer waiting times; and more resources going to more affluent people at the expense of the more deprived (see models below).

5.2.23 The Building Research Establishment (BRE, 2011) modelled the financial impact of removing the means test in England for all works under the value of £6,000. The study concluded that while this measure would have a significant impact on cutting down administration, it would also increase the numbers qualifying for grants by 42 per cent, from 367,000 to 521,000 households. The study also found that the main beneficiaries of this would already be asset-rich. The report concluded that removing the means test should be accompanied by the introduction of an equity test, in order to ensure that resources continue to be targeted towards those least able to afford adaptations themselves.

Key areas of debate: a staged approach

5.2.24 Up to a certain threshold, universality is likely to have the effect of helping more people more quickly, within existing resources. However, bearing in mind the need for caution in this policy area we argue that access needs to be opened up in a strictly controlled way, so that the impact can be properly understood and absorbed before implementing wider change. This could be done in two ways: either by carrying out a number of pilots in different authority areas; or by operating a staged approach in which low-level adaptations are taken out of DFG first, before larger adaptations are freed from the DFG process once the full impacts are known. In this way, the Welsh Government could set out a pathway towards universal access to adaptations services over the

long- term, giving all agencies time to reconfigure in advance of changes.

5.2.25 A more modest alternative would be for the Welsh Government to aim for universality for lower cost adaptations only. It is perhaps more appropriate that the precise threshold is negotiated between Welsh Government and local authorities, since the latter have the statutory responsibility for delivering DFGs. Our suggestions for appropriate levels, based on the evidence gathered during this Review, are included in the three models for change below.

5.2.26 If the Welsh Government decides that now is too difficult a time to pursue universal adaptations provision, we would recommend revisiting this issue in five years time. The prospect of local government reorganisation is likely to have implications for budgets across all local services, and this may open up the possibility of a higher level of universality than can currently be considered feasible.

Key areas of debate: defining ‘minor’ and ‘major’ adaptations

5.2.27 There was a high degree of consensus that greater consistency could be easily achieved by establishing an agreed definition of what constitutes minor and major adaptations.

5.2.28 Stakeholders argued strongly in favour of creating a minor adaptations bracket that should be *no higher than £1,000*. There was a high level of consensus here. The logic is that adaptations below £1,000 can be easily delivered via a fast-track system, being relatively straightforward in nature and not requiring OT involvement apart from in exceptional cases. Above the £1,000 threshold, adaptations start to become more complex in nature and OTs may or may not need to be involved. Keeping the threshold low will avoid waiting times being slowed up by more complex cases.

5.2.29 Many stakeholders also argued in favour of the merits of creating a middle band of adaptations. These are adaptations where OTs may or may not need to be involved, depending on circumstances. There is potential to deliver these without means testing. Alternatively they could be supported by an ILG-style fund which acts in a triage capacity to prioritise urgent cases.

5.2.30 A third band of adaptations would comprise the most complex and expensive. OT involvement in these cases is essential. Again there is potential to deliver these with or without means testing, although the financial risks of removing means testing would be greater for this tier. Triage according to urgency may also be an option.

5.2.31 There were persuasive arguments from some participants in favour of index-linking thresholds to ensure they remain relevant over time. In some ways, setting financial limits is somewhat crude since adaptations may cost slightly different amounts in different parts of Wales depending on rurality and so on. However there are practical difficulties involved in establishing non-financial definitions of minor, mid-level and major adaptations, not least the fact that accompanying guidance would need to be quite detailed to avoid different interpretations leading to inconsistent approaches.

5.2.32 Ensuring consistency in the way adaptations are defined by delivery agencies, especially 'minor' adaptations, will help create greater fairness and consistency, and will lead to the collection of more meaningful performance indicator data, regardless of which other policy solutions or models for change are adopted.

Key areas of debate: improving the existing means test

5.2.33 The practical difficulty of ensuring that resources are prioritised for those least able to pay is that any method of prioritisation inevitably leads to 'winners' and 'losers', some of whom may be deemed able to pay when in fact they cannot.

5.2.34 While there is probably no such thing as a 'perfect' means test, there may be potential for the Welsh Government to review the existing test and define a new one that addresses some of the criticisms voiced by stakeholders during this study, namely that the test is a blunt tool for assessing need; is overly complex in terms of the calculation; does not take proper account of the costs of living with a disability; and for all the previous reasons, ends up preventing some people from accessing adaptations.

5.2.35 The Building Research Establishment (BRE, 2011) analysed a range of options for reforming the DFG means test. The study analysed means testing approaches in other service areas including care and Warm Front Grants. Researchers then used English House Condition Survey data to model impacts of potential changes.

5.2.36 The results are summarised in Table 8. DFGs are funded differently in England – funding is ring-fenced rather than being passed to local authorities through General Capital funding as is the case in Wales. This means that some caution is needed in interpreting what the implications might be for Wales. However, the data is nevertheless a useful indication of the broad impacts of altering the means test.

5.2.37 The report suggested that reform of the means test could be accompanied by some form of equity test:

'Using equity to pay for adaptations is never going to be popular, but in the current and short term future economic climate it is going to be necessary to address this. It is very difficult to justify giving someone a grant of £10,000 when they are the outright owner of a home worth £200,000... the administrative savings and the large number of additional disabled facilities grants that could be awarded should be sufficient incentive to find a way to make this work'. (BRE, 2011: 77).

5.2.38 Reforming the means test in Wales would involve considerable detailed work and it is beyond the scope of this study to indicate exactly how the test should be changed. The Welsh Government would need to investigate competency issues, since the means test is currently contained in England and Wales legislation for which DWP is responsible. There may therefore be challenges in unravelling this. However, we think that given the criticisms of the current test voiced by stakeholders during this Review, as an alternative to universality there is merit in exploring the potential for a new test for Wales that would be perceived to be fairer. Such a new test could also have the positive financial benefit of unlocking significant sources of funding for adaptations that are currently tied up in property equity.

Table 8: Impacts of options for reforming the DFG means test (BRE, 2011)

| Options for reforming means test | Main impacts (England) | Administrative impact | Impact on applicants |
|--|--|---|---|
| 1. Using real housing costs rather than a standard housing allowance | Numbers qualifying for grants would reduce by 5.18 per cent Average grant would increase slightly from £5,191 to £5,340 | Increase in administration due to applicants supplying details of housing costs | Main beneficiaries are of working age and paying at least some of their own rent or mortgage. 'Losers' include older households who are most likely to be outright owners |

| | | | |
|---|--|---|---|
| 2. Raising allowances to income support/pension credit plus 25 per cent | Numbers qualifying for grants would increase by 7.63 per cent Average grant would decrease slightly from £5,191 to £5,148 | Initial work to modify software/methods, but no ongoing additional burden | Overall, little impact on numbers or types of people eligible, but does appear to provide a little more support to retired people whose income is above the basic minimum for means tested benefits |
| 3. Modifying the loan calculations by removing tapers | Virtually no impact on numbers eligible Average grant would increase slightly to £5,529 | Initial work to modify software/methods but no ongoing additional burden. Loan amounts simpler to calculate | Overall, this option helps younger households with mortgages in deprived areas at the expense of older people who are outright owners |

5.3: Options for change: three models

5.3.1 The following three models illustrate what change might look like in practice. However, the three models are not mutually exclusive and include elements that could potentially be combined in new ways. For example, Option 1 includes elements of good practice that could be adopted if Options 2 or 3 were implemented.

Option 1: Status quo

5.3.2 Under this model existing funding streams and delivery agencies remain the same, with a strong focus on adopting best practice. The following proposals emerged from fieldwork as improvements that could be made to existing systems now, without any structural change:

- All agencies delivering adaptations would ensure that their OT teams are working in the most efficient way possible. All assistant OTs would receive accredited Trusted Assessor training. All agencies delivering adaptations would check procedures against the College of Occupational Therapists' guidance *Minor Adaptations Without Delay* (COT, 2006) which sets out a clear framework for when Trusted Assessors can be used instead of OTs.
- Local authorities that do not already have a fully operational Accessible Housing Register in place would work with RSL partners to develop one. Serious consideration should be given to ways of including the private rented sector.
- Local authorities that do not already have a full agency service in place would consider introducing one, to support people through the DFG process as swiftly as possible.
- Local authorities that do not already offer stairlift grants would consider following existing good practice, by introducing a grant stream that recycles straight stairlifts to be delivered outside DFG.
- Local authorities that do not already have a multi-disciplinary team working on adaptations, with OTs in the same team as Housing, would consider reorganising teams in this way following existing good practice in Wales.

- Local authorities would revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator, from first point of contact, as recommended in current guidance.
- Welsh Government would refine performance measurement by separately measuring time taken from initial enquiry to assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all delivery agencies. There is also potential for the development of more service user-focused performance measures, building on work currently underway in homelessness.
- Welsh Government would consider ways of improving the quality of data on adaptations across the system, to assist the development of good policy. Full equality data would be collected across all protected characteristics in a consistent way across Wales.
- Welsh Government would look at ways of creating greater accountability and transparency among social landlords for efficient use of adaptations. We suggest that social landlords should be required to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal.
- The complexity of current systems would be easier to negotiate if service users had access to better information. Organisations arranging or providing adaptations would review current information to ensure it is clear and accessible. Information should meet all protected characteristics under the Equality Act and should be available in a range of languages and formats that reflect the diverse backgrounds of the people of Wales.

Table 9: Implications of the ‘status quo’ model

| | |
|--------------------------|---|
| Benefits | <ul style="list-style-type: none"> • Low risk measures. • Potential for more efficient and consistent delivery of DFGs. • Potential for more efficient re-use of adaptations in social housing. • Better information to evaluate and improve services. |
| Risks | <ul style="list-style-type: none"> • Insufficient improvements in DFG delivery times. • Does not address criticisms of inequality and complexity in system. • Local authorities cannot be required to adopt best practice. • Possible resistance from social landlords to reporting additional data. |
| Financial implications | <ul style="list-style-type: none"> • Local authority staff time to establish new policies and procedures and reorganise teams. • Staff time in Welsh Government and all delivery agencies to develop national data collection procedures. • Staff time for all adaptations agencies to review information provision and OT practices. • Costs of establishing and maintaining stairlift grant(s). • Costs of delivering Trusted Assessor training – £500 per course. |
| Legislative implications | <ul style="list-style-type: none"> • None. |

Option 2: A unified system for adaptations

5.3.3 Under this model, all adaptations across all tenures and ages would be delivered by a single organisation. Existing funding streams would be merged into a single pot.

- 5.3.4 In the current economic climate the authors of this report do not consider it feasible to create an entirely new agency for delivery. Given that local authorities already provide adaptations to the owner-occupier and private rented sectors, which together account for 84 per cent of Welsh housing (StatsWales, 2012/13) this report considers that the most viable option would be for local authorities to have sole responsibility for delivering adaptations.
- 5.3.5 In putting all adaptations through a single process, there is a significant risk of creating bottlenecks. There is a risk that some applicants who today can have adaptations carried out relatively quickly would have to wait longer. The DFG system is already under extreme pressure in terms of caseloads. For these reasons the authors of this report consider that a unified system for adaptations will need to deliver as many adaptations as possible without means testing.
- 5.3.6 This report also considers that for a unified system to be sufficiently resourced, there would need to be shared fiscal responsibility between Health and Housing. This would need to be negotiated between Welsh Ministers.
- 5.3.7 The main features of a unified system would be as follows:
- All adaptations below £1,000 would be delivered via a fast-track system. Local authorities could deliver these directly or work in partnership with agencies such as Care and Repair. No means testing and no OT involvement apart from in exceptional circumstances.
 - Mid-level adaptations would be defined as those costing more than £1,000 and less than £7,000-£10,000 – precise threshold to be negotiated with local government. OT involvement may or may not be necessary depending on circumstances – would be determined at referral stage. These adaptations would be delivered without

means testing – or alternatively, would be supported by an ILG-style fund which acts as a triage for urgent cases.

- Major adaptations would comprise the most complex. OT involvement would be essential. Again there is potential for an ILG-style fund to triage urgent cases.
- Apart from isolated examples of partnership working, Health is not currently a key stakeholder in the adaptations system despite benefiting financially from adaptations provision. In a unified system, Welsh Ministers would work together to establish shared fiscal responsibility between Health and Housing for adaptations, with Health strategically contributing to a single pot of funding.
- Local authorities would be encouraged to adopt strong local partnerships similar to the approach demonstrated during the ILG pilot, with health, social care, housing and other relevant agencies represented.
- This approach creates the possibility for staged adoption of universality. Funding for lower-level adaptations would be passed to local authorities first, to be distributed outside DFG. This would be followed by funding for mid-level adaptations being passed across in a similar way, and finally funding for complex adaptations. Funding would need to be hypothecated, with a contingency fund in place (see Financial Implications below).
- Alternatively, funding for all adaptations could be passed straight to local authorities, with the means test remaining in place. Social tenants who are not currently means tested would be tested. This would create a level playing field and be more financially viable, although is likely to be unpopular with social tenants. This would also create an administrative burden since most social tenants

would pass the means test without having to make a financial contribution.

- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.
- Local authorities would also adopt other elements of best practice as outlined in Option 1, including Accessible Housing Registers; multi-disciplinary teams; agency service; efficient use of OT assistants; consistent reporting of the Performance Indicator according to Welsh Government guidance; reviewing the quality of information; and the use of stairlift grants.

5.3.8 The financial implications of a unified system are particularly complex. We have identified the following issues that would need to be considered:

- DFG funding is currently unhypothecated. If funding for all adaptations was passed to local authorities through General Capital Funding, there is a strong possibility that it would be allocated to other, larger service areas experiencing financial pressures. The risk of reduced resources for adaptations is too significant for unhypothecated funding to be a viable option in the current economic climate.
- Ring-fencing would be extremely difficult to negotiate with local authorities due to a general reaction against this approach. If agreement could be reached over hypothecation, the fund would need to be set at a generous level to avoid the risk of running out mid-year. One potential solution might be for the Welsh Government to retain a contingency fund for local authorities to draw on if budgets run out mid-year.

- Creating a single funding pot would need to be handled sensitively since there is a significant risk of damaging relations between agencies. Identifying the total amount spent on adaptations and top-slicing Social Housing Grant would be a complex exercise, as would working out how to distribute funding.
- Health is a service area with acute internal pressures on budgets, making the prospect of negotiating shared fiscal responsibility challenging.
- Additional funding would be needed to minimise the risk of bottlenecks in the single LA process as well as to account for LSVT adaptations; any ILG-style triage fund; and any higher demand due to removal of the means test.
- Removing the means test for minor and mid-level adaptations raises issues about ensuring resources go to those least able to afford adaptations themselves.
- Giving local authorities sole responsibility for adaptations removes any incentive for social landlords to increase adaptations funding or create discrete pots of funding to meet local identified needs – this could lead to less money going towards adaptations overall.
- Taking responsibility for adaptations away from RSLs would lead to redundancies. Local authorities would need to take on new staff to process higher caseloads.

Table 10: Implications of the ‘unified system’ model

| | |
|------------------------|---|
| Benefits | <ul style="list-style-type: none"> • One stop shop would be simpler for service users. • A single process would be equitable across all tenures. • Urgent cases triaged and taken out of means testing. |
| Risks | <ul style="list-style-type: none"> • Local authorities may not welcome additional responsibility particularly if it includes removing the means test. Local authorities are likely to resist hypothecation of funding. • Resistance from social landlords – hard to justify taking away funding where there is little evidence of poor performance. • RSL tenants may have to wait longer for adaptations than is currently the case, and may have to face means testing unless it is removed at the same time – could reduce access to adaptations in social housing. • Strong likelihood of longer waiting times across all tenures unless additional funding can be provided. • Removal of incentive for RSLs to invest may mean less money available for adaptations overall. • Potential failure to negotiate successful settlement with Health. |
| Financial implications | <ul style="list-style-type: none"> • Significant staff time for Welsh Government and all agencies currently delivering adaptations to create a single funding pot – identifying current spending, top-slicing SHG, working out distribution formula, reorganising teams including redundancies and new recruitment. • Need to establish hypothecated fund and contingency fund. Additional funding needed to avoid bottlenecks in single LA process. • Negotiation with Health for shared budget. • Negotiation with LAs for removal of means test. • No incentive for RSLs to invest in adaptations. • Local authority staff time to establish new policies and |

| | |
|--------------------------|--|
| | <p>procedures and reorganise teams.</p> <ul style="list-style-type: none"> • Staff time in Welsh Government and all delivery agencies to develop national data collection procedures. |
| Legislative implications | <ul style="list-style-type: none"> • Removing minor and/or mid-level adaptations from means testing might be possible through regulations as was the case for the parental means test. However, legal advice would be needed. |

Option 3: A tiered system for adaptations

5.3.9 Under this model existing funding streams are retained, but with a greater focus on retaining and building on elements of best practice as demonstrated by PAG, ILG and RRAP. The emphasis is on streamlining the front end of service delivery in a way which is more equitable for service users, while maintaining a range of funding streams to relieve pressure across the system.

5.3.10 The main features of a tiered system would be as follows:

- All adaptations below the value of £1,000 would be defined as ‘minor’ adaptations, removed from DFG means testing and delivered via a fast-track system. OT involvement would not be needed apart from in exceptional circumstances. RRAP would be expanded to apply across all tenures and ages for all adaptations up to £1,000.
- Welsh Government would define a middle band of adaptations. Ideally this middle band should also be delivered without means testing. OT involvement may or may not be necessary depending on circumstances. We recommend that the threshold between mid-level and major adaptations should be set at between £5,000 and £7,000. However the precise threshold would need to be negotiated with local authorities. The aim would be to set a threshold for removing the means test that can be met as far as possible through

existing General Capital funding, by offsetting administrative savings against increased applications. This means that the threshold is likely to be lower than in Option 2.

- The third band would comprise major adaptations, for which OT involvement would be essential. These adaptations would need to remain means tested until the full implications of removing means testing for lower cost adaptations are known. In the long-term, it would be desirable to remove means testing for this band too.
- As with Option 2, this approach creates the possibility for staged adoption of universality, with lower tier(s) being removed from means testing first. Also as with Option 2, removing the means test for minor and mid-level adaptations does raise issues about ensuring resources go to those least able to afford adaptations themselves.
- For all tiers where means testing remains in place, an ILG-style fund would be established to act in a triage capacity specifically for urgent cases.
- Welsh Government could work with one or more local authority partners to trial the complete removal of the DFG means test.
- Welsh Government would work in partnership with local government and, possibly, private sector partners to develop a range of affordable options to assist households to meet their contribution towards the cost of adaptations. These financial products would be made available in a consistent way across Wales and may include recyclable loans; equity release options; charges on properties; or assistance provided by Social Services departments under Section 2(1)(e) of the Chronically Sick and Disabled Persons Act 1970. Home Improvement Loans (still in development at the time of

writing) would also be eligible since adaptations contribute towards safety in the home. The aim would be to relieve applicants from having to source private finance on the open market.

- Welsh Government would establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing means test. This work could take the report by the Building Research Establishment (BRE, 2011) as a starting point. Welsh Government would need to investigate competency issues.
- Performance measurement would need to be adjusted to account separately for performance for minor, mid-level and major adaptations.
- Local authorities would also adopt other elements of best practice as outlined in Option 1, including Accessible Housing Registers; multi-disciplinary teams; agency service; efficient use of OT assistants; consistent reporting of the Performance Indicator according to Welsh Government guidance; reviewing the quality of information; and the use of stairlift grants.

Table 11: Implications of the ‘tiered system’ model

| | |
|--------------------------|---|
| Benefits | <ul style="list-style-type: none"> • Quicker and more consistent delivery of minor and mid-level adaptations for all applicants across all tenures. • Adaptations more affordable for those deemed able to pay. • A new means test perceived to be fairer. • Retains and builds on existing good practice from RRAP, ILG and PAG. • Urgent cases triaged and taken out of means testing. |
| Risks | <ul style="list-style-type: none"> • Removal of means test at too high a level leading to pressure on DFG budgets and longer waiting times. • Does not address criticisms that system is too complex. • Local authorities cannot be required to adopt best practice. |
| Financial implications | <ul style="list-style-type: none"> • More funding for RRAP – currently receives £1.6 million. This could be doubled to £3.2 million with a contingency fund in case demand outstrips resources mid-year. • Funding for a new ILG – previous fund was £1.5 million. • Welsh Government and local government staff time to develop affordable finance options, plus costs of establishing new loan fund(s) – should be self-financing over long-term. • Welsh Government staff time to establish new policies and procedures. • Local authority staff time to establish new policies and procedures and reorganise teams. • Welsh Government and partner agency staff time to investigate reform of means test. • Staff time in Welsh Government and all delivery agencies to develop national data collection procedures. |
| Legislative implications | <ul style="list-style-type: none"> • Removing minor and/or mid-level adaptations from means testing could potentially be done through regulations as was the case for the parental means test. However, this would require legal advice. • Reforming the means test would need primary legislation, once competency was established. |

6: Conclusions and recommendations

- 6.1 The problems with the current adaptations system have been well documented in successive inquiries and reviews. The purpose of this Review was not simply to revisit those problems but rather to move the debate to the next stage: if some of the proposed solutions that have been discussed over the years were actually implemented , what would the impacts be?
- 6.2 In this section concluding remarks are made and a way forward is recommended based on the three options above.
- 6.3 The overarching problem, as perceived by the majority of participants in this Review, is the fact that applicants do not receive the same level of service across Wales. Waiting times and costs depend very much on a person's tenure and age as well as in what part of Wales they happen to live. The level of support for the idea of a unified system reflects the fact that stakeholders feel strongly that people ought to receive the same level of service no matter who they are.
- 6.4 In assessing the impacts of options for change, we have noted a certain irony in the fact that the solution which appears on the surface to be the simplest – that is, a move to a unified system – is actually the most complex in terms of the financial implications and levels of risk to service users. Creating a unified system would be a very expensive undertaking and there is little evidence that putting all applicants through one system would result in better outcomes. In fact the qualitative evidence gathered as part of this review, suggests the opposite: a strong likelihood of longer waiting times and reduced budgets.
- 6.5 This review identified a wide range of proposals that could feasibly create greater consistency and fairness without the problems of pooling

budgets. This report argues that a 'one system' approach to adaptations should be a guiding principle for policy development regardless of who actually delivers the service. This would mean ensuring that, broadly speaking, recipients of adaptation services can expect similar levels of service no matter what their circumstances may be. It would mean encouraging greater consistency in terms of means testing, information provision and waiting times.

- 6.6 As a starting point, it is recommended that data collection is refined across all providers to enable comparisons to be made between funding streams and improve understanding of the variances in provision. Consistent data that is comparable across providers could be a valuable source of intelligence for benchmarking and planning future services. However, in this Review a meaningful level of quantitative analysis was unable to be carried out due to inconsistencies and gaps in current data collection.
- 6.7 However, it is important to bear in mind that 'one system' should not mean 'one size fits all' for two reasons: a) a single process for all is not practical where people's tenure and circumstances are very different; and b) some disabled people today receive a very good, quick service and it is hard to justify putting that at risk.
- 6.8 It is also important to acknowledge where provision has worked well and to build on that good practice. PAG, ILG and RRAP all stood out in the analysis as responsive, flexible funding streams that were often delivered in a highly person-centred way. It makes little sense to close down funding streams that work well – rather the focus should be on what works and how to replicate that across the system. In practice, that means focusing on DFGs as the funding stream with the greatest level of stakeholder concern over delivery times and inconsistencies.
- 6.9 This Review finds that the primary source of inequality in the system is the DFG means test itself. The Review recognises that there is a debate

to be had around the merits of universal provision as opposed to assessing ability to pay, particularly at a time of reduced public funds. However, the authors of this report conclude that removing the means test *up to a certain level that is consistent across Wales* is financially possible now, and would make a significant contribution towards achieving equality of outcome.

6.10 This Review has outlined a roadmap towards removing the means test for all adaptations *in the long-term*. This needs to be a carefully staged process in order to avoid creating longer waiting times as well as undue pressure on the public purse.

6.11 This Review recommends that Welsh Government adopt a combination of Options 1 and 3 as follows:

Recommendation 1: Welsh Government should make a commitment to move towards staged adoption of universal provision of adaptations without means testing in the long-term.

Recommendation 2: Adaptations provision should be reorganised into a tiered system that is consistent across Wales:

- Minor adaptations up to £1,000.
- Mid-level adaptations between £1,000 and £5,000-£7,000 (precise level to be negotiated with local government).
- Major adaptations above £5,000-£7,000.

Recommendation 3: Welsh Government should require local authorities to exempt minor adaptations (defined as those costing £1,000 or less) from means testing.

Recommendation 4: Welsh Government should negotiate with local government the exemption of mid-level adaptations from means testing.

Recommendation 5: Welsh Government should make an ILG-style fund available to triage urgent DFG cases for all tiers where means testing remains in place.

Recommendation 6: The RRAP funding stream currently delivered by Care & Repair Cymru should be expanded to cover all tenures and ages for all adaptations up to £1,000.

Recommendation 7: Welsh Government should work in partnership with local government and other partners to ensure that a range of affordable options to assist households to meet their contribution towards the cost of adaptations are available across Wales in a consistent way. Options might include recyclable loans; equity release; charges on properties; assistance provided by Social Services departments under Section 2(1)(e) of the Chronically Sick and Disabled Persons Act 1970; or Home Improvement Loans.

Recommendation 8: Welsh Government should establish a working group to examine the feasibility of creating a new DFG means test for Wales that addresses criticisms of the existing test.

Recommendation 9: Welsh Government should require social landlords to report the number and value of all adaptations removed from their stock on an annual basis, categorised by reasons for removal.

Recommendation 10: Welsh Government should consider ways of improving the quality of data on adaptations across the system, to assist the development of good policy. Full equality data should be collected across all protected characteristics in a consistent way across Wales.

Recommendation 11: Welsh Government should refine the adaptations performance indicator by separately measuring time taken from initial enquiry to assessment; and assessment to completion. We recommend collecting performance data in a consistent way from all

delivery agencies. There is also potential for the development of more service user-focused performance measures. Performance indicators should account separately for minor, mid-level and major adaptations.

Recommendation 12: All agencies delivering adaptations should ensure that their OT teams are working in the most efficient way possible:

- All assistant OTs should receive accredited Trusted Assessor training.
- All agencies should check procedures against the College of Occupational Therapists' guidance *Minor Adaptations Without Delay* (COT, 2006) which sets out when Trusted Assessors can be used instead of OTs.

Recommendation 13: All agencies delivering adaptations should review current information provision to ensure it is clear and accessible. Information should meet all protected characteristics under the Equality Act and should be available in a range of languages and formats that reflect the diverse backgrounds of the people of Wales.

Recommendation 14: Local authorities should revisit NAFW circular 20/02 and ensure they are following the established procedure for measuring the performance indicator, from first point of contact, as recommended in current guidance.

Recommendation 15: Local authorities that do not already have a fully operational Accessible Housing Register in place should work with RSL partners to develop one. Serious consideration should be given to ways of including the private rented sector.

Recommendation 16: Local authorities that do not already have a full agency service in place should consider introducing one, to support people through the DFG process as swiftly as possible.

Recommendation 17: Local authorities that do not already offer stairlift grants should consider following existing good practice, by introducing a grant stream that recycles straight stairlifts to be delivered outside DFG.

Recommendation 18: Local authorities that do not already have a multi-disciplinary team working on adaptations, with OTs in the same team as Housing, should consider reorganising teams in this way following existing good practice in Wales.

Appendix 1: Grant providers' questionnaire

Below is the list of questions asked via the grant providers' questionnaire.

1. What is your job title?
2. For whom do you work?
3. Briefly describe your role in relation to adaptations?
4. What local authority(ies) do you work in?
5. What funding/grants do you provide for housing adaptations across which tenures?
6. *for local authorities only* How do you fund the various adaptations and DFGs you provide? And if you provide adaptations outside the DFG process, how do you decide when to use DFGs and when to use other delivery mechanisms?
7. Please list the grants you provide and their (financial) cut off points.
8. How do you target adaptations budgets/funds?
9. Have your adaptations budgets/funds changed in the recent times (the previous 2-3 years)? If so, how? And what has been the impact of this?
10. Does your organisation offer an 'agency-type' approach to service users seeking adaptations?
11. If so, what percentage of the adaptation cost do you charge for this?
12. Do you have a minor adaptation budget or fast track service?
13. If yes, (a) what is it called? (b) on what is it based – e.g. cost, adaptation type or complexity? (c) what is the maximum amount that falls under this scheme (what is the cut off cost? For example, if you provide DFGs then what is the minimum and maximum adaptation you would process via this stream?) (d) what type of grant is used for this service?
14. How do you rate the effectiveness of your minor adaptation budget or fast track scheme?
15. Is there a figure in your area below which means testing is not required for adaptations?
16. If so, what is this figure? And how appropriate do you feel this to be?
17. Are there different sources of budget funding for adaptations in your area?

18. If so, do you think these could these be pooled into a single pot for all tenures?
19. Does every adaptation require the involvement of an Occupational Therapist (OT)?
20. If yes, how do you source your OTs?
21. If no, how is the assessment of need made? (e.g. trusted assessor, OT assistant under OT supervision)
22. Is there a figure in your area below which an OT assessment is not required for adaptations?
23. If so, what is this figure? And how appropriate do you feel this to be?
24. Do you use framework agreements for adaptation jobs?
25. In your professional opinion, what are the advantages and/or disadvantages to using them?
26. Do you feel there any delays to the adaptations processes in your area?
27. If so, what do you think causes this and how do you think this could be altered?
28. What do you feel are the three main strengths in the current adaptation systems?
29. What do you feel are the three main weaknesses in the current adaptation systems?
30. How equitable do you feel the adaptations processes for the different housing tenures (owner occupier, Council owned, Large Scale Voluntary Transfer, Social Housing e.g. Housing Associations) is?
31. What, if any, changes would you like to see to the adaptations processes for the different tenures?
32. What does the adaptation funding you provide include?
33. What is your professional view of what adaptations funding should cover?
34. What changes (if any) do you feel could be made to adaptations processes in your area to ensure that you were enabled to deliver good quality, appropriate adaptations and value for money?
35. How do you share good practice? And do you feel there could be any improvements in the sharing of good practice? If so, what might these be?

36. When does the adaptation process start? For example, first enquiry, OT assessment, grant application?
37. What changes (if any) do you feel could be made to adaptations processes to ensure that timely adaptations were delivered in as quick as time possible?
38. How do you monitor your adaptations processes?
39. What equality monitoring data do you collect and collate?
40. What performance indicators are you obliged to provide? For example, proportion of adaptations completed within a certain number of days, the average wait time from first contact with the LA to payment of the grant. And for which funding processes are you required to provide them?
41. What do you think your performance indicators should consist of?
42. In your professional opinion, why do you think performance in the delivery of adaptations varies between tenures and local authorities?
43. What changes (if any) could be made to increase consistency?
44. Do you record how many adaptations processes are not completed?
45. If so, what do you feel are the reasons for non completion?
46. What internal factors account for your performance of adaptations both now and in the future?
47. What external factors account for your performance of adaptations both now and in the future?
48. Are there any other comments you would wish to make?

Appendix 2: Wider stakeholders' questionnaire

Below is the list of questions asked via the wider stakeholders' questionnaire.

1. What is your job title?
2. Briefly describe your role in relation to adaptations.
3. What local authority (ies) do you work in?
4. In your local authority area is there a lead person who manages the adaptation processes? If so, what is your understanding of their role?
5. In your professional opinion, how do service users find out about adaptations processes in your area?
6. What other agencies do you work with?
7. In your professional opinion, how effective is joint working in your area?
8. How (if at all) could joint working between agencies be improved?
9. In your professional opinion, do you feel there are any delays to the adaptations processes in your area?
10. If so what do you think causes this? And how could this be overcome?
11. In your professional opinion, how effective do you think the adaptations processes in your area is? Please explain your answer. What makes it effective? Or what makes it ineffective?
12. What effect do you feel the housing tenure (owner occupier, Council owned, Large Scale Voluntary Transfer, Social Housing e.g. Housing Associations) has on adaptations processes?
13. How equitable do you feel the adaptations processes for these different tenures are?
14. What, if any, changes would you like to see to the adaptations processes for the different tenures?
15. In your area, what does adaptation funding include?
16. What is your view of what adaptations funding should cover?
17. The Welsh Government collects Performance Indicator (PIs) information on adaptations processes from local adaptation providers, were you aware of these?
18. What do you think such performance indicators should consist of?
19. In your professional opinion, why do you think performance in the delivery of adaptations varies between tenures and local authorities?

20. How do you feel consistency across tenures and local authorities could be achieved?
21. In your professional opinion, what do you feel are the main strengths in the current adaptation systems?
22. In your professional opinion, what do you feel are the main weaknesses in the current adaptation systems?
23. What changes (if any) do you feel could be made to adaptations processes to ensure adaptations were delivered consistently across tenures and local authorities in Wales?
24. What changes (if any) do you feel could be made to adaptations processes to ensure that timely adaptations were delivered in as quick as time possible?
25. What changes (if any) do you feel could be made to adaptations processes to ensure that you delivered value for money with your service?
26. How do you share good practice?
27. Do you feel there could be any improvements in the sharing of good practice? If so what might these be?
28. Is there a figure in your area below which means testing is not required for adaptations? If so, what is this figure? And how appropriate do you feel this to be?
29. Is there a figure in your area below which an occupational therapy assessment is not required for adaptations? If so, what is this figure? And how appropriate do you feel this to be?
30. Are there different sources of budget funding for adaptations in your area? If yes, in your opinion, could these budgets and funding streams be pooled into a single pot of funding for adaptations in all tenures? Please explain this answer.
31. Are there any other comments you would wish to make?

Appendix 3: Initial stakeholder interviews – other stakeholders

Interview Questions

1. Where do you work and what is your role?
2. How does the home adaptations process fit into your role/responsibilities?
3. How easy do you think it is for service users in Wales to find out information about the adaptation process?
4. Do you think information is easily available for service users?
5. How could information be more accessible to people seeking information on adaptations?
6. What are the barriers to making information more accessible? And what are the enablers of doing this?
7. What are your opinions on how adaptations are funded in Wales?
8. Do you think it is an effective system? Please explain your answer.
9. Do you think that funding arrangements are consistent between tenures?
10. Do you think that funding arrangements are consistent between local authorities?
11. What do you think are the main reasons for inconsistency in terms of how funding is deployed?
12. How could the funding of adaptations in Wales be improved?
13. What are the barriers to doing this and what are the enablers?
14. How do you feel that means testing is dealt with and what kind of effect do you think it has on grant uptake?
15. What are your opinions on how adaptations are delivered in Wales?
16. Do you think it is an effective delivery system overall?
17. Do you think the delivery of adaptations is consistent between local authorities?
18. Do you think the delivery of adaptations is consistent between tenures?
19. Do you think the delivery of adaptations is consistent between funding streams?

20. What do you think are the main reasons are for inconsistency in terms of the delivery of adaptations?
21. To what extent do you feel that the needs and expectations of those other than the disabled person are taken into account when adapting a property?
22. Do you think that delays occur in the delivery of adaptations? If so, what types or delays and what are the main reasons for them? How could delays be overcome?
23. How could the delivery of adaptations in Wales be improved?
24. What are the barriers to doing this and what are the enablers?
25. Overall, what are the main strengths of the current home adaptation system?
26. Overall, what are the main weaknesses of the current system?
27. Overall, what improvements could be made to the system?
28. What needs to happen to make this a reality?
29. Any other comments?

Appendix 4: Interviews with service users

Interview Questions

1. How long ago did you go through the adaptation process?
2. Was the adaptation for you or for a family member (for example, for a child or for another family member?)
3. What local authority area were you living in at the time of your application?
4. Were you living in council housing, housing association, private rented or owner-occupied at the time?
5. What funding grant did you apply for (if known), for example, a DFG, PAG etc? What adaptation to your home did you require?
6. Did you complete the process? Did you receive your adaptation? (If yes, then ask the questions in Part 1. If no, then ask the questions in Part 2)

Part 1

7. How did you find out about applying for home adaptations in your local authority area?
8. How easy was it to find the information on the process you were looking for? Who did you contact and how?
9. How easy was it to contact the person/organisation responsible for administering the grant? Did they explain the process? Were you happy with the information you were given?
10. Was the process of home adaptations explained clearly to you? What, if anything, could have been improved about communicating information to you?
11. Did a number of professionals work together to meet your needs (for example grants officers, OTs etc)?
12. Did you have to contribute any of your own money towards your adaptation? If so, how did you feel about this?
13. Did you work with an occupational therapist? How helpful was this to the process for you?
14. How do you feel about the delivery of the adaptation? (Probe: length of time taken; communication; quality of adaptation provided)

15. What worked well about the adaptations experience for you? What didn't work so well?
16. What impact has the experience had on your life?
17. What would have improved the experience for you?
18. How do you feel about the adaptation now? Was it useful to you? What has been the impact on your life? Do you have any concerns about the future regarding your adaptation?
19. If you required an additional adaptation in the future would you do anything differently this time?

Part 2

20. At what point in the adaptation process did you stop?
21. Why did you stop the process?
22. Would anything have prevented you from stopping the process? If so, what?
23. What alternative did you go for, if any?
24. Did stopping the process have any impact on your, or your families', life? If so, what?
25. Would you use the home adaptation service again? Please explain your answer?
26. What could be improved about the service?
27. Any other comments?

Appendix 5: Options considered in workshops

1. There should be a consistent cut off point for 'major' and 'minor' adaptations
 - These are currently very variable and are usually decided upon by cost with various financial cut off points adopted to determine what is a minor and what is a major adaptation
 - If there is to be a cut-off point at what level should it be set?

2. There should be a single pot/pooling of funding for all adaptations services across all tenures
 - If yes: would this result in more standardisation and equality of provision? Would there be a single access point for people seeking adaptations?
 - If no: would this risk funding being weighted towards one tenure group?
Why should Housing Departments fund owner occupiers?

3. There should be a single adaptation system for all tenures
 - Should a fast track PAG style system be available across all tenures?
 - Should the focus of the system be more needs rather than tenure/cost led?
 - Should RRAP be available across all tenures?

4. Adaptations information provided by organisations should relate to all service users and not be dominated by information aimed at older people
 - A review of organisations' website and information packs revealed an emphasis in pictures and words on older people, how can organisations get the message across that adaptations are for all ages?

5. Communication should be improved by having an adaptations team
 - Could grants officers and OTs work together in the same setting?
 - How do or can OTs and other organisations work together?
 - How would one point of contact for service users work in practice?
 - Could an adaptations team provide more targeted information packs?

6. The DFG means test needs to be reviewed
 - Should it be removed altogether? What would be the consequences of its removal?
 - How could its implementation be made more consistent? (The review found that some local authorities voluntarily did not means test for certain issues – like terminal illness or council home tenants)
 - Should the means test below the minor adaptations limit (however that is defined) be removed?
 - Should the way in which the DFG means test is assessed be changed? If so how?
 - Should loans be offered to those who fail the means test?

7. The DFG limit of £36,000 should be increased to cover larger and more complex adaptations
 - What might be the consequences of doing this?

8. In relation to a local authority offering an agency service to people seeking an adaptation, there should be a fixed fee
 - The Review has found a variable approach to this with fees being on a sliding scale or a percentage of the grant cost, ranging from 5-15 per cent. Should the fee charging be consistent across local authorities and if so set at what level?

9. Consistent framework agreements with contractors should be used
 - If so should they be rolled out nationally?

10. The involvement of Occupational Therapists should be more consistent
 - Should the involvement of OTs be determined by a maximum adaptation cost?
 - Should the involvement of OTs be determined by the complexity of the service user need?
 - Should OTs be involved in every adaptation?
 - Would a screening assessment system help to decide upon the need for the involvement of OTs?

11. Reasonable decoration and matching décor costs should always be covered in a grant cost
 - What would be the implications of this?

12. Performance Indicators (PIs) currently focus only on overall time taken for the whole process. Should performance indicators be wider than this – for example, focusing on cost benefit analysis, service user outcomes?
 - There is currently minimal guidance from Welsh Government on how to complete/record performance indicators, should Welsh Government provide more robust guidance on how to record current and/or new PIs?
 - When time is measured as a performance indicator should it be split up into more overt chunks than overall time? For example: time to assessment, time from assessment to adaptation installation, time from assessment to DFG application, time taken for searches etc.

13. Welsh Government should robustly monitor adaptations processes and associated performance indicators
 - If so how should they do this?

14. Any other issues?

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