



Response to Disabled Facilities Grant Programme Consultation Paper

Submitted to Communities and Local Government

By Care & Repair England

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1. About Care & Repair England

- 1.1. Care & Repair England is a national charity established in 1986 to improve the housing and living conditions of older and disabled people.
- 1.2. Its aim is to innovate, develop, promote and support housing policies and initiatives which enable older and disabled people to live independently in their homes for as long as they wish.
- 1.3. The effective delivery of home adaptations plays a key role in achieving this aim.
- 1.4. The Director of Care & Repair England is co-chair of the government's advisory body, the Housing and Older People Development Group (HOPDEV), and served on both the (then) ODPM's independent review group set up to consider the future of DFGs and also on the Advisory Group to the College of Occupational Therapists/ Housing Corporation joint work on delivery of adaptations (*Minor adaptations without delay*).

2. General Comments

- 2.1. Care & Repair England welcomes many of the proposals to improve service delivery set out in the Consultation paper.
- 2.2. However, the level of resources available for Disabled Facilities Grant (DFG) remains a major determinant of whether adaptation needs are met. Hence the future level of investment will be critical to the success of many of the proposals for service improvement.
- 2.3. Underinvestment was identified as a key issue in the Bristol University review of the DFG system. It is therefore crucial that as well as system change there is also adequate investment in any future delivery programme.
- 2.4. The high value of adaptations to the agendas of independence, health and well-being need to be conveyed to those making decisions about the Comprehensive Spending Review settlement. Inadequate investment in adaptations will have negative consequences for the achievement of government targets to improve performance on these wider agendas.

3. Specific Issues

Greater Regional /Local Flexibility and Discretion

- 3.1. The principle of keeping DFG as a mandatory grant is welcomed.
- 3.2. The proposals to improve delivery by giving local authorities greater flexibility and passing more powers to Regional Assemblies do have potential to improve delivery.
- 3.3. However, it will be extremely important to put in place adequate safeguards both to ensure that the resources that Central Government allocates to the Regions for Adaptations are so used and also that these are adequately matched by local investment (particularly in the light of the ending of the 60%/ 40% grant condition).

3.4. To illustrate this point we note the impact of the Regulatory Reform Order on private sector housing renewal investment and the ending of ring-fenced funds for this purpose. Whilst the discretionary guidance was excellent, the resources did not follow. LAs were given flexibility and discretionary powers but without earmarked funds not only was there limited improvement but also a major decrease in expenditure on private sector housing improvement.

3.5. We welcome the proposal that Regional Assemblies will be obliged to produce a strategy for accessible housing and adaptations for the region as a whole as part of their Regional Housing Strategies. These Strategies have to date largely ignored housing for older people, let alone housing for disabled people, thus such an obligation is to be welcomed.

3.6. To ensure that this strategy is both produced, resourced and acted upon will require statutory guidance and implementation.

3.7. Thus as well as adequate resources for effective delivery there will need to be strong drivers for change ie. targets and performance indicators to ensure adherence to statutory guidance and a 'Change Agent' type of approach to support replication of best practice by less well performing authorities.

3.8. Changes to the ringfence of DFG monies could be an opportunity for improvement that some high performing authorities will grasp and use well. Unfortunately there is a danger that others will reduce expenditure and delivery will be worse when there are competing financial priorities.

3.9. Thus we would suggest that rather than abolish the ringfence altogether its scope should be widened but only if the above suggested safeguards re use of monies are put in place.

3.10. Resources are again highly relevant. If DFG remains mandatory and there is already not enough money to meet this mandatory provision, there will be no capacity to use widened powers for new initiatives.

Cross tenure

3.11. We would welcome any steps towards an ultimately tenure neutral system of adaptation delivery as long as resources are also redistributed to make such a system viable.

3.12. Thus the proposals to clarify the system with regards to the responsibility of social housing landlords are to be welcomed. However, if DFG is now to meet the needs of a larger number of households, this will need to be reflected in the DFG budget.

3.13. Our concerns remain about the problem of stock transfer resulting in a transfer of responsibility for adaptations from the landlord to the DFG system without proportionate resources allocation. This has caused significant problems in a number of areas and the proposals in the Consultation paper would not guarantee that such practices end.

Means Testing

3.14. There are suggestions throughout the document that the means testing for DFG should be brought into line with means testing for social care.

3.15. We have grave concerns about these proposals and their potential impact on older people who are at the margins of entitlement to help. Adaptations play a key role in prevention and may be the only assistance that older people ask for – far more people request help with adaptations than for Social Care ongoing support packages.

3.16. Fair Access to Care has had a negative impact on the accessibility of help for those classified as having a lower level need – two thirds of all Social Services are now only helping people whose needs are classified as critical or substantial. Thus further aligning DFG help with FACS could be very disadvantageous to older people with moderate adaptation needs.

3.17. With regard to the detail of the means test, whilst accepting that including a notional housing element rather than actual housing costs disadvantages people with high mortgages, merging with the Social Services financial assessment (which would only include actual housing costs) would greatly disadvantage lower income older people who do not have a mortgage and who are on the borderline of welfare benefit entitlement; the '*not rich, not poor*'.

3.18. Whilst accepting the logic to aligning means tests in a streamlined system, we would argue that any future means testing system should include a notional housing element and the threshold for help should move up rather than down.

Passporting

3.19. Wider passporting to DFG (Clauses 48/49) along the lines of Warmfront grant entitlement are welcomed, particularly in the light of the comments about the wider issues of prevention and making adaptation help more available to people before a crisis.

Individual Budgets

3.20. We note that longer term changes to the whole DFG system are likely to take place in line with Individual Budgets.

3.21. Whilst welcoming the principle of this, we do sound a note of caution given the comments above about adaptations often being relatively small scale, one off interventions. It will be crucial that the administration of Individual Budgets are proportionate, particularly if adaptations are incorporated; if a person needs a relatively modest bathing adaptation it is crucial to avoid the creation of a system whereby in order to obtain this a person has to go through the process of a comprehensive assessment of need (as has happened in the past).

Repayment of Grant

3.22. We have a general concern that this proposal introduces yet more age discrimination into the DFG system.

3.23. Already the means test has been removed for families with disabled children. And whilst supporting that move, Care & Repair England did express concerns about the funding

of this change from existing resources, which ultimately means that there is less money available for adaptations for disabled adults.

3.24. To now propose that families with disabled children are exempt from any new arrangements for repayment of grant is discriminatory. There is also a questionable logic. On the whole, the highest value adaptations such as the building of an extension are for disabled children. Also, it is usually only these large extensions that significantly add value to a property. Thus these would be the main adaptations for which repayment might make economic sense.

3.25. The primary group that would potentially be affected by the proposed repayment system is older people.

3.26. As well as the age discrimination argument, there are also potentially negative unintended consequences for grant repayment.

3.27. The ending of repair grants and the promotion of loans has resulted in a large reduction in take up, particularly amongst 'older old' people who are extremely reluctant to go into debt. Thus the very older people who could benefit most from essential adaptations that support independence and living safely at home, may well be put off from carrying these out. This could subsequently impact on demand for health and social care services.

3.28. From a practical perspective, given the average level of current DFG payment, at the levels proposed the majority of current DFG recipients would only have a small charge put on their property. It is questionable whether the administration of such amounts would be cost effective.

3.29. Within the terms of the consultation paper question, we would however, suggest that grant should only be reclaimed if more than £5,000 and that an amended option iii) be considered – ie. Repay grant above £10,000 with a maximum repayment of £10,000 *and a minimum repayment of £5,000.*

Re-designation of Stairlifts as Equipment

3.30. We welcome this proposal as long as adequate funding follows such a change.

Organising the Adaptations Delivery Service

3.31. We would strongly support the proposal to consider the roll out in England of a system along the lines of the Welsh Rapid Response Adaptations Programme (RRAP) and have submitted a paper to the Comprehensive Spending Review to put forward the case for such a development.

3.32. We would also support the view expressed in the Consultation that home improvement agencies (HIAs) have an important role to play in the delivery of adaptations. However, we would not agree that this role should necessarily extend to taking over the delivery of adaptations in all areas.

3.33. HIAs were originally established to support older and disabled people through the practical process of undertaking adaptation and repairs to their homes and act as an independent advocate for householders.

3.34. It should be possible to develop models (based on current best practice) of adaptation delivery that combines the advocacy role with more efficient control of grants by local authorities that avoid duplication. We have some concerns that the independent advocacy role of HIAs might be put at risk if they were also controlling the funding for adaptations.

3.35. There are also capacity issues for many HIAs. Whilst there is a small number of larger HIAs which are well managed and offer a broad range of quality services, there are many which are significantly under-resourced. Therefore capacity for significant expansion of their role would have to be carefully considered in each locality.

4. Concluding Comment

4.1. We very much welcome the publication of the consultation paper and would hope to have the opportunity to work with the Department on the detail of its implementation and further developments to improve the wider delivery of adaptations.