

Wiltshire Council

Environment Select Committee

3 March 2021

Final Report of the Housing Aids and Adaptations Task Group

Purpose of the report

1. To present the findings and recommendations of the task group for endorsement by the committee and referral to the Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change and Military-Civilian Integration for a response.

Background

2. On 14 May 2019, the Chairman and the Vice-Chairman of the Environment Select Committee met for a briefing meeting with the Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change and Military-Civilian Integration and the Director for Housing and Commercial Development. The meeting discussed housing aids and adaptations and how evidence was showing that those with a significant disability were waiting longer than a general needs household to access affordable housing, because there were not enough suitable properties available in Wiltshire for the severely disabled.
3. The Executive proposed that overview and scrutiny engagement in this area could help to add value, as the Cabinet Member wanted to ensure that Wiltshire made better use of its collective adapted housing stock (including those properties in the private rented sector and owned by Wiltshire's main social housing providers). With this in mind, it was agreed that a report be put forward to the Environment Select Committee on the matter.
4. Following a report to the Environment Select Committee on [3 September 2019](#) on 'Housing Aids and Adaptations', the committee resolved to establish a task group, to review the Council's approach to meeting the needs of households who require adapted housing and to support the Cabinet in developing and shaping policy in this area.
5. This task group aligns with the Business Plan 2017-27 priority of 'protecting the most vulnerable' and reports into the Environment Select Committee, as the scrutiny committee with responsibility for the housing portfolio.

Terms of reference

6. The following terms of reference for the task group were endorsed by the Environment Select Committee on [5 November 2019](#).

1. To consider the ways in which Wiltshire Council can reduce the waiting time for residents with disabilities to access suitable housing, through:
 - a) Reviewing how the Council works with Housing Associations and private landlords, to increase the availability of suitably adapted properties
 - b) Reviewing the use of the Disabled Facilities Grant in Wiltshire and whether there is scope for further work with partners, to help them access this funding
 - c) Assessing whether all future Wiltshire Council housing stock could be built with some degree of adaptation, to meet current building regulations
 - d) Assessing whether relative design standards for new build properties could become policy for all affordable housing providers in Wiltshire.
2. Consider how the Council could incorporate new build standards into its Local Plan, to help ensure that there is a sufficient supply of aided and adapted properties to meet the needs of residents with disabilities in Wiltshire.
3. Consider data in providing suitable and adapted properties for residents with disabilities and make recommendations, where appropriate, for improvement.
4. Consider the Council's Housing Allocations Policy and whether there is scope for disabled individuals to access housing outside of the Homes4Wiltshire scheme.

Membership

7. The task group comprised the following membership:

- Cllr Trevor Carbin
- Cllr Bob Jones
- Cllr Carole King
- Cllr Gordon King
- Cllr Pip Ridout (Chairman)

Methodology

8. The task group is grateful to the following witnesses for contributing to the scrutiny review:

Individual	Title/Job Role
Cllr Richard Clewer	Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change and Military-Civilian Integration
Mike Dawson	Head of Estate and Development, Wiltshire Council

Simon Hendey	Director of Housing and Commercial Development, Wiltshire Council
James Hudson	Private Sector Housing Manager, Wiltshire Council
Andrew Mead	Commissioning Officer, Wiltshire Council
Claire Moore	Principal Development Officer, Wiltshire Council
Ian Seeckts	Governance and Scrutiny Officer: Housing Operations, Wiltshire Council
Nicole Smith	Head of Housing Operations and People Service, Wiltshire Council

9. Alongside receiving verbal evidence from the above individuals, the task group also considered the following information:
- Habinteg Briefing: Accessible Housing Standards 2015
 - Local Government Ombudsman March 2016 report: Making A House A Home – Local Authorities and Disabled Adaptations
 - Wiltshire Council: Council Housing Allocations Policy
 - Wiltshire Council: Data on Disabled Facilities Grant (DFG) payments and customer waiting times
 - Wiltshire Council: Housing Board [Challenge and Change Scrutiny Group's](#) report and recommendations on Aids and Adaptations
 - Wiltshire Council: Negotiating New Adaptable Affordable Homes in Wiltshire
 - Wiltshire Council: Private Sector Housing Strategy
10. The task group met five times between October 2019 and May 2020. This report and its associated recommendations have been discussed with the executive and officers.

Evidence

Disabled Facilities Grant

11. A [Disabled Facilities Grant](#) (DFG) is a grant provided to disabled people who require some form of aid or adaptation to their property, to meet their housing needs. An aid or adaptation can range from a stairlift to a ramp, to a wet room installation or a house extension. A DFG is a means tested benefit, however when the application is for a child, no means testing is applied.
12. There are four key stages to the DFG application process. The initial two stages centre on deciding whether to approve the application, with the final two stages being about completion of any requested work. At stage one an Occupational Therapist carries out an assessment, to determine whether an aid/adaptation is necessary and appropriate for the grant applicant.
13. At stage two, a specialist housing practitioner assesses whether the proposed aid/adaptation would be reasonable and practical. DFG law defines the criteria

for how each of these two assessments should be carried out. If the application is not successful at this point, the Council is required to present alternative options to the applicant.

14. Once a DFG is approved, it moves to stage three. At this point, Housing go out on behalf of the customer to tender with three reputable companies from an approved contractor's list. This is an option for the customer as they could appoint an external agent to do this. The aid or adaptation work is then commissioned by Housing. Stage four is about the completion of the requested work. Naturally, timescales for completed work tend to vary, depending on the nature of the aid or adaptation.
15. In pursuit of continually improving its service, the Council had recently attached some internal Key Performance Indicators (KPIs) to its work in progressing DFG applications. These KPIs demonstrated that, where an application was held up in the initial two stages, time was not recouped in the final two stages; resulting in any work being completed outside of target timescales. However, in response to this fact, Housing had recently recruited two housing specific Occupational Therapists and therefore, any delays in the initial assessment stage of a DFG were expected to soon be reduced.
16. In terms of financing a DFG, the Housing Revenue Account funds any DFG approved aids or adaptations for individuals living in Wiltshire Council housing stock. This is because the Housing Revenue Account is a funding pot set aside for the Council's housing stock.
17. As for those living in non-Wiltshire Council housing stock, such as in a Housing Association property, the Better Care Fund (BCF) finances DFG approved aids and adaptations. Housing Associations could contribute to DFG work and some are more generous than others with these payments.
18. In Wiltshire, the BCF is shared between the Council and the Wiltshire CCG, with the Council's Health and Wellbeing Board required to authorise any spend from the BCF. Historically, there had never been an issue with the Council drawing down funding from the BCF for housing aids and adaptations. Additionally, the oversight of the Health and Wellbeing Board was regarded by officers as representing adequate scrutiny for how the BCF is spent. However, some members disagreed that the Board's role provided sufficient oversight in this respect.
19. In 2018/19 the Council completed aids and adaptations for 227 DFGs, with the average grant amount applied for being between £7000-8000. The maximum amount that an individual can apply for through a DFG is £30,000, however, there is no means test applied if the application is for a child. The Council does have the power to offer a discretionary amount above the £30,000 threshold, however, this provision is rarely requested from applicants. During 2018/19, Wiltshire's BCF had a budget of £2.2 million.

20. The majority of DFG applications in 2018/19 were received from those between the ages of 81-90 years. Most applicants were also in receipt of housing benefit (or Universal Credit) and resided in a Housing Association property.
21. Although KPI data indicated that the Council was not meeting some of our target timescales for the completion of housing aids and adaptations, nationally Wiltshire was faring well. For example, in some local authorities when a DFG application is received, the Council asks the applicant to resubmit the application in the following year's cycle, despite the fact that this individual may meet the criteria for a DFG. This approach is taken because all of the funding from the BCF is exhausted, meaning the Council has no funding left for DFGs. This has not been the case in Wiltshire.

Adaptable and Affordable Housing Policies

22. There has been extensive research from the Local Government Ombudsman, think tanks, as well as the third sector to demonstrate that if all housing was built to a certain standard; known as the Lifetime Homes standard or M4(3) standard, then it would be much easier and quicker to adapt housing to the needs of the severely disabled.
23. In other words, as not all housing has been built to the Lifetime Homes standard, currently when an individual requests a specific adaptation to their home, this can take a significant amount of time to implement, because the property has not been built to accommodate for the needs of the disabled or elderly in the first instance.
24. For example, if all properties were built to meet the needs of wheelchair users by having wider door frames and level-access to all rooms, then should there be a request in the future for an additional adaptation to the home, this would be much easier, quicker and cheaper to fulfil, as the property has already been built with the needs of the disabled in mind.
25. At present, the adopted Wiltshire Core Strategy has no specific policy requirements for securing adapted affordable housing through its negotiations on new affordable housing developments. This means that a developer does not have to build affordable housing to a specific adaptable standard in Wiltshire. Additionally, as the Council has no policy on adapted affordable housing, it cannot carry out enforcement in this regard. Legitimate enforcement relies on there being a specific policy in place.

Wiltshire Council's Housing Allocations Policy

26. As mentioned above in 'background', evidence showed that some severely disabled households were waiting longer to access affordable housing than

general needs households. This was seen to be because there are a lack of suitable properties for the severely disabled in Wiltshire.

27. Furthermore, if a disabled household was bidding for a property on the open market register, it would be highly likely that some form of adaptation work would need to be undertaken to make the property suitable. This would mean that the landlord would lose income during the time taken to make the property suitably adaptable. Subsequently, in these instances, the majority of landlords chose to offer their property to a non-disabled household; which contributed to disabled households waiting longer to access affordable housing.

Challenge and Change Scrutiny Group

28. The Challenge and Change Group (C&CG) represent the scrutiny function of Wiltshire Council's Housing Board, which has responsibility for ensuring scrutiny of Wiltshire Council's housing stock, otherwise known as Wiltshire's Housing Revenue Account properties.
29. The C&CG decided to undertake a scrutiny exercise into housing aids and adaptations because this topic is seen to be a hugely complex area, requiring input and liaison from a range of Council departments and contractors. Moreover, Registered Providers had become less willing to undertake aids and adaptations work and the C&CG were aware that aids and adaptations were an emotional issue, with residents having high expectations both in terms of customer service and the quality of the adaptation received.
30. The C&CG conducted a survey of residents to ascertain their views and expectations on housing aids and adaptations. Most respondents detailed that they felt that an aid/adaptation should be completed within one month, however, the reality was that it often took around six months to complete. Completing any aids and adaptation work is not a quick process and the customer aspirations of one month would be unrealistic to achieve, even a basic stair lift can take 6 weeks to order and contractor time also needs to be scheduled and this can also take a few weeks
31. From their extensive research, the C&CG recommended that if an adaptation would cost more than £20,000, it would be better to move the disabled household to a more suitable property. Providing the customer with an option to move when adaptations are towards the higher end of the maximum limit are always a consideration, however this is a customer choice and sometimes the preference is to stay in their existing home.

Conclusions

Disabled Facilities Grant

32. The task group concluded that one reason why it often took an extended period of time to approve and complete a DFG was because of the need to collect three

quotations for the proposed aid/adaptation. Therefore, if the Council used its data for the most commonly requested DFGs and allocated average prices to these aids/adaptations, it could be that only one quotation is required, because the Council already has something to compare to the contractor's figure.

33. When it came to minor highways alterations, such as painting double yellow lines or building a zebra crossing, a document outlining the average price for this work had enabled these amendments to be implemented quicker. This approach could deliver the same benefit in regard to DFGs.

Adaptable and Affordable Housing Policies

34. Some of Wiltshire's neighbouring authorities, such as BANES and South Gloucestershire, had recently implemented adapted affordable housing policies. This showed that it would be possible for Wiltshire to do the same. Also, lessons could be learnt from these local authorities' experience, as well as best practise shared in ensuring engagement and compliance from developers.

Wiltshire Council's Housing Allocations Policy

35. In response to the fact that some disabled households were waiting longer to access affordable housing than general needs households, some local authorities had been operating a separate Disabled Housing Allocations Policy, which ran parallel to the local authority's generic housing allocations policy. Members agreed that disabled households should not be waiting longer to access affordable housing and therefore, running a separate disabled housing allocations policy ought to be something Wiltshire should consider further.

Challenge and Change Scrutiny Group

36. From the evidence provided by residents to the C&CG survey, it appeared that there was a disconnect between public expectation for when an aid/adaptation should be completed, and the actual time taken to install the aid/adaptation. The task group felt that better publicity of the Council's policies around aids and adaptations, coupled with an explanation of the average time taken to complete any work, would help the public to better understand the necessary internal processes, as well as the reasons why an aid/adaptation could often not be installed within a month.
37. Also, whilst members agreed with the C&CG's recommendation that when an adaptation would cost £20,000 or more, it would be better to move a disabled household to a more suitable property, the task group emphasised the importance of familial and community links; stating that these should be prioritised in the decision about whether to move a disabled household to another property.
38. Consequently, if the Council was able to use current data to help predict where there would be the greatest future need for aided and adapted properties and include this information in future housing planning, then this would help to ensure

that in the cases where a disabled household needed to be re-located, households would be moved to an area that allowed them to sustain their existing familial and community links.

Proposal

39. To endorse the report of the Task Group and refer it to the Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change and Military-Civilian Integration for response at the Committee's next meeting.

Recommendations

- 1. For the Environment Select Committee to welcome the positive and proactive engagement from the Executive throughout this important review**
- 2. For the Environment Select Committee to consider a report in 12-18 months' time, outlining how these recommendations have been implemented by the Executive**

That the Cabinet Member for Corporate Services, Heritage, Arts, Tourism, Housing, Climate Change and Military-Civilian Integration considers implementing the following recommendations:

- 3. In order to ensure that a future adaptable affordable homes policy in Wiltshire is robust, efficient and delivers greater accessibility to affordable housing for disabled households, to work closely with the other local authorities, such as BANES and South Gloucestershire, who have already implemented adaptable and affordable housing policies by:**
 - a) Learning about the issues faced by these local authorities in reviewing their Local Plans**
 - b) Understanding how developers responded to the adaptable affordable housing policies put forward**
 - c) Understanding how these adaptable affordable housing policies are enforced**
 - d) Reviewing how council service areas, such as social care and revenues and benefits, have provided evidence to support a locality's need for adapted affordable housing**
- 4. In order to speed up the Disabled Facilities Grant process, from the initial Occupational Therapist's assessment through to the completion of work, to work with other local authorities to:**
 - a) Draft a document which outlines the average cost for the most commonly requested aids and adaptations – e.g. a stairlift or wet room**
- 5. In order to reduce the number of delayed transfers of care, to work closely with the Reablement team within Adult Social Care and publicise the**

Council's Aids and Adaptations policy, so that those seeking to return to their home are aware of the provision available

- 6. In order to ensure that disabled households are not waiting longer than general needs households to access affordable housing, to consider operating a direct let process for Disabled applicants through the Councils Housing Allocations Policy, which would run in line with to the current banding structures. This will be developed through the Preferred Development Partnership to encourage all housing providers with stock in Wiltshire to accept direct lets of clients who have a high need for properties that are adapted or would be suitable for adaptation**

Cllr Pip Ridout, Chairman of the Housing Aids and Adaptations Task Group

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Appendices

None

Background documents

Links have been provided within the body of the report, but are included again below:

[Environment Select Committee](#), 3 September 2019 – where the committee received a report on housing aids and adaptations

[Environment Select Committee](#), 5 November 2019 – where the committee endorsed the task group's Terms of Reference

Housing Board: [Challenge and Change Scrutiny Group](#) – webpages and link to Housing Aids and Adaptations report

[Disabled Facilities Grants](#) – overview of what a Disabled Facilities Grant is, eligibility criteria and how to apply