



HOUSING ASSOCIATIONS AND HOME ADAPTATIONS: FINDING WAYS TO SAY YES



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**Taylor
Wimpey**

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PREFACE



The Disability Facilities Grants (DFG) system is a vital resource providing some of social housing customers' most complex adaptation requirements. These adaptations often change people's lives, enabling greater independence, safety and wellbeing.

Unfortunately, as this report describes, the DFG system is sometimes slow and complex, resulting in long waits. This matters. Every day lived in a home without the right access features is a day that a disabled person is limited by their environment and prevented from going about their life with the ease and comfort that non-disabled people take for granted.

Housing associations have always been proud of the difference they make in their communities and the positive impact that good quality suitable housing can have on tenants' lives. How we deliver adaptations should be integral to every provider's strategy.

Habinteg was delighted to support this valuable research project and report. Its recommendations are an invaluable guide to help us all optimise the way we support our tenants to benefit from the DFG. Alongside our colleagues in the sector, we will be using them at Habinteg to challenge and improve our practice, and we will encourage others to do the same.

Nic Bungay
Director of Housing and Assets, Habinteg

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PREFACE



Nothing in life is permanent. So it's crucial that as your circumstances change your home environment can change to reflect your needs.

Suitable and appropriate homes play a central role in people's health and wellbeing but what is right for one person may not be right for another. The diversity of the housing association sector is a real strength, with specialist providers of housing and care such as Anchor, for example, working alongside a range of other specialists and mainstream providers.

Housing associations play a crucial role in ensuring people have choices in where and how to live. Supply does not always meet demand though and it is crucial that, as well as developing new homes which are future-proofed for changing needs, we focus on adapting existing homes.

This report offers important practical solutions to the challenges faced when implementing home adaptations and shows how to integrate home adaptations with other housing services. Ultimately, the information in these pages has the potential to improve countless lives.

It is down to all of us as providers to learn from it and ensure that as the future brings change, our homes can change too.

Jane Ashcroft CBE
Chief Executive Officer, Anchor



ACKNOWLEDGEMENTS

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Support for this project has come from three organisations:



- **Anchor Hanover** is England's largest provider of specialist housing and care for people in later life.



- **Habinteg** has worked for over 50 years to provide accessible homes and neighbourhoods and helps decision makers understand the social and business case for building inclusive communities.



- **Foundations Independent Living Trust** is the charitable arm of Foundations, the National Body for Home Improvement Agencies in England. With the generous support of Taylor Wimpey, the Trust funds projects that improve the delivery of home adaptations.



- **Taylor Wimpey** is one of the largest British based housebuilding companies.

THANKS TO CONTRIBUTORS

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SUMMARY

Aims of this study:

- To look in depth at how adaptations are funded and delivered in the sector – including minor adaptations and use of the Disabled Facilities Grant (DFG).
- To examine how funding arrangements might be improved and the delivery process made quicker and more effective.
- When adaptations are not the right solution, to see how the moving process might be improved.
- To encourage a longer term and more strategic view of home adaptations.

It follows on from an independent review of the DFG in England in 2018. The focus is on housing associations rather than the retained council stock as associations use DFG funding while the council stock uses the Housing Revenue Account. It covers England as the arrangements for the funding of adaptations are different in Wales, Scotland, and Northern Ireland.

The research identifies:

- **Good practice**, particularly in LSVTs that control their own adaptations budgets, those fully engaged with their disabled and older tenants, or where there are effective partnership arrangements.
- **Issues in funding and delivery** including splits in legal responsibility, a confusing pattern of funding, a post code lottery in the type of services provided, complex customer journeys and frustration for staff in local authorities and associations.
- **Rather than saying ‘yes’ to adaptations, barriers are often placed in the way** and adaptations may be refused, especially in general needs properties. They may also be removed unnecessarily when tenancies change.
- **Moving home is not easy if a home is unsuitable or not possible to adapt.** Not enough accessible homes are being built and adapted homes are not recycled effectively. Asset management data bases are sometimes incomplete, there are few accessible housing registers, void times are too short, and there is not enough support to match people to properties or to provide help with moving.
- **Home adaptations lack importance** – although disabled tenants form a substantial part of housing association populations, most associations see adapting homes as a minor operational issue. It is not part of a strategic plan to make the stock work for everyone.
- **A lack of disabled people working in the sector** - a National Housing Federation Survey in 2021 showed that disabled people are under-represented as staff members, not visible as leaders in the sector, and

SUMMARY

only 4.8% of board members identified as disabled.

This report provides recommendations for associations, local authorities, central government, and the Housing Regulator to sort out the confusion about funding and improve the speed and effectiveness of home adaptations delivery.

It provides practical solutions to put disabled and older tenants at the heart of decision-making, an inclusive approach to services, and for home adaptations to be part of the new customer-focused inspection regime.

How are housing associations performing?

Housing association tenants

54% have a long term illness or impairment.

18% of new lettings are to people with a defined disability.

43% are 55 and over - average age 52.

Suitability of the stock

21% of disabled tenants say their accommodation is unsuitable.

56% of those needing adaptations do not have them

21%-18% decline in the proportion of adapted homes in the housing association sector in the last decade (in contrast it has increased in the retained council stock).

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Note

Although we have tried to avoid using too many abbreviations it is easier to use acronyms for terms that are used frequently which include:

- DFG - Disabled Facilities Grant
- OT - Occupational Therapist
- HIA - Home Improvement Agency
- LSVT - Large Scale Voluntary Transfer organisation (council stock transferred to the housing association sector).
- DHSC - Department of Health and Social Care
- DLUHC - Department of Levelling Up, Housing and Communities, formerly the Ministry of Housing, Communities and Local Government (MHCLG). Reports published by the department prior to the change of name in 2021 are referenced as MHCLG.

RECOMMENDATIONS

HOUSING ASSOCIATIONS

- Review adaptation budgets and set the minor adaptations threshold at a minimum of £1,000 per case (preferably higher to follow best practice) to prevent handovers to local authorities, long waiting times for tenants, cover the rising cost of work, and develop better designs.
- Ensure home adaptations staffing levels are sufficient to meet need and always have a named officer to lead on adaptation cases.
- Landlord (not tenant) applications to be used for DFG cases.
- Use capital works budgets (not limited adaptation budgets) to contribute to expensive cases above the upper threshold for DFG funding.
- Improve home adaptation information on asset management databases.
- Routine housing reviews to include future housing needs (adaptations / moving).
- Develop a 'Managed Rehousing' process to match people to properties and provide practical support for disabled and older people needing to move.
- Base the home adaptations and managed rehousing services in an integrated 'inclusive housing' or 'customer service improvement' team.
- Appoint more disabled people in all departments and to leadership positions.
- Use co-production with disabled and older tenants to drive service improvement.
- Appoint an Inclusive Housing Lead to ensure that disabled people do not get left out of major strategic and operational policy decisions and that services are joined up more effectively.
- Use the [Inclusive Living Toolkit](#) to develop an approach that will work across strategic areas.

RECOMMENDATIONS

LOCAL AUTHORITIES

- Landlord (not tenant) applications to be used for all housing association DFG cases using standard paperwork (Appendix A).
- Top-slice DFG funding for specific associations to allow them to manage work themselves.

HOMES ENGLAND AND THE HOUSING REGULATOR

- Inspection regime to include home adaptation and home move services for disabled people of all ages.

CENTRAL GOVERNMENT

- Update the DFG allocation formula to take account of housing association use of the DFG.
- Issue guidance to make the level of contribution to the DFG consistent for all housing associations across England.
- Resolve issues about the funding of common parts before Section 36 of the Equality Act is enacted and provide guidance to local authorities and landlords.

1. INTRODUCTION

1. Introduction

Over half (54%) of housing association tenants have a long term illness or disability and almost a fifth (18%) of new letting are to households with specific disability needs.¹²

The majority of social housing is for general needs which was not designed to be inclusive, and much of the specialist stock is now quite old. It means that many homes need modifying to meet people's needs. Home adaptations include:

- Minor changes - such as grab rails, extra stair rails, outside rails, small ramps, lever taps or heating controls
- Major work - such as level access showers, stairlifts, through lifts, hoists, wash and dry toilets, reorganising the layout, altering the access, or building accessible extensions.

This report looks at the role of housing associations in the funding and delivery of

home adaptations in England. Using online surveys, in-depth interviews, discussion groups, published reports and a range of data sources it explores what is happening with the current provision of home adaptations. The focus is on minor adaptations delivered by housing associations and their use of the Disabled Facilities Grant (DFG).

The report identifies splits in legal responsibility, a confusing pattern of funding, a post code lottery in the type of services provided, unnecessarily complex customer journeys and frustration for overstretched staff delivering services in both local authorities and housing associations. Adaptations are sometimes refused, and some are taken out at change of tenure. It is also not easy for tenants who need to move to find alternative housing.

Although there is a lot of good practice and effective partnership working, in most associations home adaptations are seen as a

1 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Home adaptations report 2019-20.

2 Ministry of Housing Communities and Local Government (2021) Social Housing Lettings: April 2019 to March 2020, England – April 2021 Update.

minor operational issue. There are few strategic plans to make the existing housing stock work effectively for the considerable numbers of disabled tenants.

The accessibility and inclusivity of the existing stock is vital. It creates life chances for people of all ages including families with disabled children, people of working age and those in later life. It helps people keep their dignity and confidence, prevents falls, improves mental health, reduces demands on carers and care services, and keeps people living independently in their community.

Adaptations provide value for money for housing associations by enabling people to maintain their tenancies, and it saves considerable sums for health and social care by reducing hospital admissions and the need for care. There are also substantial economic benefits if more disabled people can access education and obtain and maintain employment.

However, 21% of housing association households with at least one person with a long-standing health condition said their accommodation was unsuitable and 56% of those who need adaptations lack them.³ Despite considerable investment in adaptations from housing associations themselves and through the DFG, the number

of adapted homes in the sector has declined in the last decade from 21% to 18%.⁴

This report makes recommendations for landlords to take more control of the adaptation process. This includes sorting out inconsistencies in funding and delivery arrangements and making the customer pathway quicker and more straightforward. There is a pressing need to improve the design of adaptations to bring them up to date and make them less stigmatising. This will also reduce the number of adaptations removed at change of tenancy. Overall, it is about trying to find ways to say 'yes' rather than obstructing or delaying the adaptation of homes, particularly in general needs properties.

Home adaptation services are not always joined up effectively with other services. There needs to be more information about the needs of disabled and older tenants, and adaptation services need to be integrated with other new-build, retrofit and rehousing policies as part of an inclusive and preventative housing strategy. This would enable cases to be picked up earlier, better solutions found, and more people helped to retain or regain their independence.

Aims and Objectives

In 2018 there was a major review of the DFG in England. Although this was comprehensive, it was unable to look in depth at social housing

3 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Home adaptations report 2019-20

4 *Ibid.*

and recommended that further work was undertaken.⁵ This report is a follow-on to that review.

The report has a number of aims:

- To look in depth at how adaptations are funded and delivered in the sector – including minor adaptations and use of the Disabled Facilities Grant (DFG).
- To examine how funding arrangements might be improved and the delivery process made quicker and more effective.
- When home adaptations are not the right solution, to see how the rehousing process might be improved.
- The overall aim is to encourage a longer term and more strategic view of home adaptations to better accommodate tenants who already have, or will develop, health conditions and impairments.

The focus of the report is on housing associations rather than the retained council stock as associations use DFG funding while the council stock is funded separately using the Housing Revenue Account. However, many of the findings and conclusions in the report apply across the social rented sector.

Alongside this report Foundations is developing an online guide to good practice in adaptation design <https://wwwFOUNDATIONS.UK.COM/design/>. Better design would make it easier to approve adaptations, make it less likely that they will be removed, and help to create a more inclusive

housing stock. The website will be useful for people delivering adaptations across all tenures.

Who is this report for?

It provides important information for central government policy makers, Homes England, the Housing Regulator, Ombudsman services, and national organisations representing housing and local government. It is essential reading for people at both strategic and operational level in the housing association sector, and those delivering adaptations in local authorities and home improvement agencies.

It will inform tenants themselves, tenant organisations and those in the charitable sector trying to argue for better services. It will also be helpful for those delivering council housing adaptation services, private sector landlords with ambitions to develop large portfolios of affordable housing, and investors in new affordable homes.

Report structure

- The report begins by laying out the financial, legal, regulatory arrangements and the duties placed on different organisations involved in funding and delivering adaptations.
- It then looks at why social housing is so important for disabled people, the nature of the housing stock, the needs of different groups, and the importance of prevention.

⁵ Mackintosh, S., Smith, P., Garrett, H., Davidson, D., Morgan, G. and Russell, R. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England.

- The report goes on to discuss the complexities of the funding situation, from both the housing association and local authority perspective, and the options for reform.
- The adaptations delivery process is examined, looking at the barriers to effective operation, and how the customer pathway might be improved.
- When home adaptations are not possible, or not allowed, people need to move and often require help to find a suitable home. The problems are outlined, and ways of providing more effective services explored.
- The final section looks at how to bring about change, including the employment of more disabled staff, better data about disabled and older tenants, co-production of services, more measurement of outcomes, and how associations might develop more joined-up and inclusive housing policies.

Social model of disability

Underpinning this report is the social model of disability. It is not a person's physical or mental impairment, illness or difficulty that causes disability, but the way society is organised. Disability only occurs when people's impairments are not accommodated by society. Everyone should be able to participate fully, safely, and free from prejudice in all aspects of daily life.

There are significant barriers in relation to housing. Badly designed buildings prevent equal access and limit life chances. Another

set of barriers is the attitude of decision-makers, service providers and the way services are organised.

In the case of home adaptations, the barriers are seldom about direct prejudice but the fact that adaptation services were never properly designed. Instead, they have evolved from numerous strands of legislation, regulation and guidance. It has resulted in inconsistencies in funding and complex customer pathways. There is a lack of understanding by decision-makers about the impact this has on disabled and older people's housing outcomes.

This report aims to show how barriers can be broken down for disabled tenants. It is about making adaptation services more tenant-centred and ensuring they work faster and more effectively. It is also about joining up services to provide a wider mix of opportunities, including the ability to move to a more suitable home where this is appropriate.

Disabled people are such a key group of housing association residents that home adaptations deserve to be higher up strategic and operational agendas. Currently, disabled people are under-represented as employees and leaders in housing associations.⁶

Employing more disabled staff and bringing disabled tenants into the decision-making process will improve access to the right homes and help make the housing stock work for everyone.

⁶ National Housing Federation (2020) Equality, diversity and inclusion: An insight review of housing association staff in England.

2. THE FINANCIAL, LEGAL AND REGULATORY ENVIRONMENT

2. The Financial, Legal and Regulatory Environment

This chapter outlines the different funding sources and legislation/guidance for adaptations and equipment for the home. It is a confusing picture with responsibilities split between different organisations and legislation and guidance that sometimes appears contradictory. The complexity often results in widely varying interpretations, all of which can be 'justified' through the existing legislation and guidance.

Before describing the legislation, it is useful to look back at changes made to funding arrangements over the last 30 years as it helps to explain why it has become so complex.

Removal of direct funding for housing associations

The housing association sector used to be a very small part of the housing market. In 1981 direct funding for adaptations was introduced

reaching £30 million by 1996. This was withdrawn incrementally through the late 1990s and early 2000s just at the point that the sector was expanding rapidly due to the transfer of council housing following the positive outcome of tenant ballots (Figure 2.1).

The withdrawal process began in 1996 when the Housing Corporation removed funding for minor works under £500, such as fitting grab rails and handrails. The accompanying letter said that:

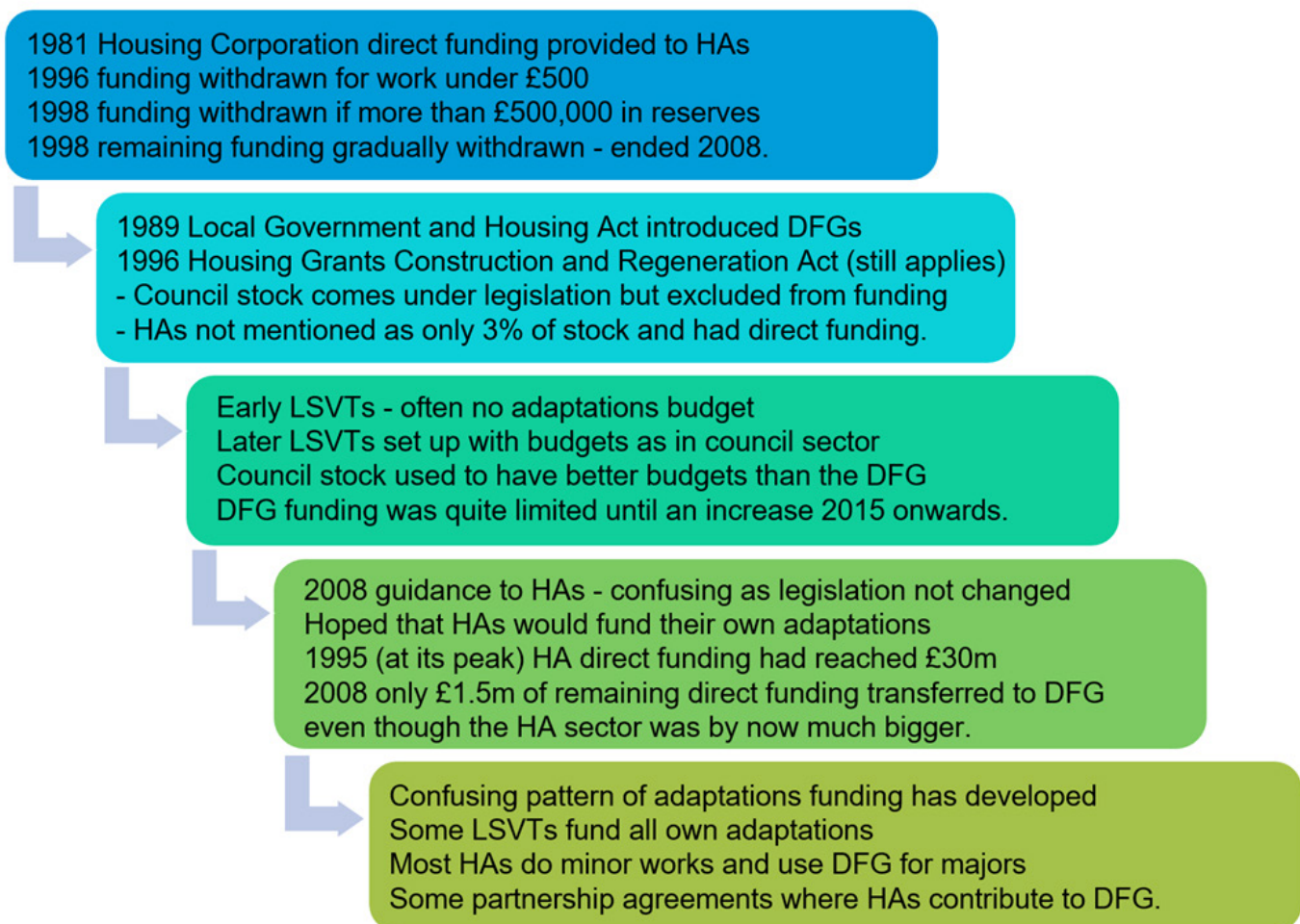
“ All responsible landlords could and should be responsible for funding (such work) by using their own resources.”

In 1998 direct funding for major adaptations was also withdrawn for the largest associations. The aim was to gradually bring housing associations into line with the funding arrangements for the council stock.

Council housing, and later Arms Length Management Organisations (ALMOs), come under the 1996 DFG legislation and they

and their tenants are allowed to apply for a DFG. However, as public bodies, councils are required to use their Housing Revenue Account to fund adaptations to their own stock. Their adaptation budgets were often far greater than the equivalent funding for the DFG although budgets have been under more pressure recently.

Figure 2.1 Stages in removal of direct funding



Source: From information in Heywood, F. and Mackintosh, S. (2008) Housing associations and home adaptations: making it work smoothly, London: Habinteg.

When council stock was transferred under large scale voluntary transfer (LSVT) arrangements in the 1990s onwards, the new organisations often had no specified budget for home adaptations; a deficit that remains. At the time they probably expected to continue to receive direct funding

from the Housing Corporation, not realising that it was about to disappear. This omission was rectified for later LSVTs. A Housing Corporation statement in 2004 said:

“ At registration with us we expect the

would-be social landlord to show how any projected adaptations will be funded, from their own resources if necessary, and that the assumed level of demand is credible.”

When the last remnants of direct funding finally ended in 2008 it was hoped that all housing associations (not just LSVTs) would fund both minor and major adaptations themselves as they had big reserves.

However, housing associations are classed as private rather than public sector organisations and, unlike the council stock, they are eligible to use DFG funding. Without changing the legislation, it was very difficult to compel housing associations to fund major adaptations themselves. Social care legislation also covers disabled people, so the 2008 guidance contained what seem like contradictory statements:⁷

- **“The statutory responsibility for funding adaptations is the duty of the welfare authority.”**
- **“This guidance does not alter the mandatory entitlement of RSL tenants to a DFG.”**
- **“It is expected that RSLs build into their business plans the funding of adaptations as part of their core activities.”**

A few associations followed the spirit of the guidance and set up their own fully funded

adaptation services, but the confusion left most local authorities and housing associations in a position of potential conflict. If associations did not fund adaptations themselves, local authorities did not have the resources to cover the costs as only a small remnant of the original direct funding was transferred across from the Housing Corporation to the DFG. To try to avoid problems the 2008 guidance stated that:

“ RSLs and local authorities are encouraged to work closely to identify likely need to help plan and deliver adaptations and enter into clear partnership arrangements for the provision of DFGs.”

In some areas this led to the development of joint agreements to share funding responsibilities. Where established, these often worked well, particularly with housing associations that had a strong local base. However, not all authorities were able to set up agreements, and not all associations were willing or able to comply. As a result, many authorities struggled to meet the increased demand for DFGs.⁸

Adaptation agreements continue to operate, but contribution levels vary between areas and between associations. The result is a confusing patchwork of funding arrangements, with some associations funding all their own

7 Note: ‘RSL’ means Registered Social Landlord i.e. housing association, and ‘the welfare authority’ is local authority social care services.

8 Heywood, F. and Mackintosh, S. (2008) Housing associations and home adaptations: Making it work Smoothly, London: Habinteg.

work, others paying into the DFG, while others use the DFG but make no contribution.

DFG allocations began to increase after 2015 which has made it easier to meet the needs of housing association tenants, but partnership arrangements have become more complex as associations have merged into bigger organisations that cover numerous local authority areas. In addition, the DFG itself is not being delivered consistently as later chapters will explain (see Chapter 5).

The history of how home adaptations funding has evolved has led to a complex picture where:

- Housing association tenants of one landlord may get a very different adaptation service from those of another landlord
- Tenants of the same association but who live in another local authority may get a different adaptation service.
- There is also a knock-on effect on other tenures when too great a share of resources is taken by housing associations.

It is these problems that this report sets out to explain, untangle and resolve.

The many different strands of legislation and guidance that affect funding and underpin home adaptations policy for housing associations are laid out in the following sections of this chapter.

Equality Act 2010

Defining Disability

Under the Equality Act a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities.⁹

‘Substantial’ means that it is more than a minor or trivial issue. For example: if it takes much longer to complete daily tasks, such as washing, dressing or preparing a meal; it is difficult to go out alone because of a physical restriction, learning disability or anxiety; or the level of pain makes it hard to walk any distance.

‘Long-term’ means that the condition or impairment will last 12 months or more. Conditions or impairments include such things as cancer, visual impairment, HIV, multiple sclerosis, or severe and long-term disfigurement. It also encompasses impairments that reduce physical abilities such as arthritis which effect the ability to grip and carry; or a mental impairment that reduces the ability to concentrate.

The definition of disability also includes conditions that fluctuate, recur, or have periods of remission that could happen again and would be substantial when they occur, such as depression. Some conditions are progressive and although not substantial at the present time will become so in the future, such as motor neurone disease. Other conditions

⁹ Equality Act 2010 (legislation.gov.uk).

like substance addiction are not considered disabilities unless they lead to impairments, such as liver disease or depression, that have substantial or long-term effects.

The legislation which governs the delivery of Disabled Facilities Grants¹⁰ references people who are disabled as being within the meaning of the National Assistance Act 1948.¹¹ However, most authorities now refer to the slightly broader Equality Act 2010 definition when deciding if an individual is eligible for DFG funding.

There are also people who may not meet these substantial and long-term tests who still require adaptations and social care authorities have a duty to support them under other welfare legislation.¹²

Public sector duty and ‘reasonable adjustments’

The 2010 Equality Act introduced a single public sector equality duty which replaced all the previous separate duties. This general duty applies to all public authorities listed in Schedule 19 of the Equality Act 2010, and to other organisation when they are carrying out public functions. It is under this duty that private registered providers of social housing (i.e. housing associations) are included within the

requirements of the Act when they are carrying out public functions on behalf of a public authority.¹³

The Equality Act gives tenants the right to ‘reasonable adjustments’ to be made to their homes and any communal areas to enable access to their home by landlords to accommodate any needs because of disability. A landlord should only refuse permission for adaptations if they have ‘reasonable’ grounds for doing so.

Regulatory Framework for Social Housing

In the regulations and guidance published by the Housing Regulator organisations must demonstrate that they understand different tenants needs in relation to equality legislation.¹⁴ Policies and services must be designed to meet the requirements of disabled tenants and there must be effective communication.

There is only one direct reference to home adaptations which is about co-operating with other organisations to provide a service that meets tenants’ need.

The key sections include:

- The **Homes Standard** Section 2.2.2:

10 Housing Grants, Construction and Regeneration Act 1996 (legislation.gov.uk).

11 National Assistance Act 1948 (legislation.gov.uk)

12 The NHS and Community Care Act 1990, The Carers (Recognition and Services) Act 1995 or The Carers and Disabled Children Act 2000 (legislation.gov.uk).

13 (on the application of Weaver) v London & Quadrant Housing Trust and Equality and Human Rights Commissioner (Intervenor) [2009] EWCA Civ 587; Poplar HARCA v Donoghue [2001] EWCA Civ 595.

14 <https://www.gov.uk/guidance/regulatory-standards>.

‘Registered providers shall co-operate with relevant organisations to provide an adaptations service that meets tenants’ need.’

- The **Tenancy Standard** says that registered providers shall publish clear and accessible policies which outline their approach to tenancy management. This includes in Section 2.2.1 (g): ‘Their policy on taking into account the needs of those households who are vulnerable by reason of age, disability or illness, and households with children, including through the provision of tenancies which provide a reasonable degree of stability.’
- The **Tenant Involvement Standard** Section 1.3.1b): ‘Registered providers shall demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.’
- Section 2.3 is about understanding and responding to diverse needs and says that: ‘Registered providers shall demonstrate how they respond to tenants’ needs in the way they provide services and communicate with tenants.’

Tenants completing adaptation works themselves

Some tenants want to carry out adaptations to their homes themselves. The right for a tenant to do this will depend on the type of tenancy

agreement and any conditions it includes.

Once any introductory period has ended, most housing association tenancy agreements give a tenant the right to carry out improvement works provided they have the written permission of their landlord. The 2010 Equality Act and the Regulatory Framework for Social Housing would apply to any decisions relating to home adaptations.

Most tenants require help and support

Most tenants require help and support with home adaptations. Some of this is provided by housing associations themselves, but tenants may also receive funding and support from local authorities. This is covered by the following pieces of social care and housing legislation, regulation and guidance.

Chronically Sick and Disabled Persons Act 1970

This legislation gave Welfare Authorities (now local authority social care services) the duty to assist disabled people in need of assistance, including through alterations to their home. As a result of the Care Act, this legislation no longer applies to adults, however it does continue to apply to children.

This means that the local authority retains a responsibility for assisting disabled children in adapting their homes, including providing funding if costs exceed the mandatory grant limit. However, financial assistance under this provision is usually limited in value and will

often be subject to certain conditions, such as a charge being placed against the property, which can present difficulties for housing association tenants in accessing this potential funding source.

The Care Act 2014

The Care Act 2014 gives social care statutory duties relating to the assessment of and response to the care and support needs of adults and their carers, which includes the adaptation of properties. It also includes the statutory entitlement to community equipment and minor adaptations.

Equipment and minor adaptations

In most areas the Social Care authority will arrange for the provision of equipment, but arrangements for minor adaptations vary between areas, with some being referred to the landlord to complete and others being completed through social care. This can lead to confusion for tenants regarding who is responsible for both the assessment and delivery of minor adaptations.

The supporting regulations clearly state that any equipment and minor adaptations for the purpose of assisting with nursing at home or aiding daily living should be provided free of charge and goes on to define a minor adaptation as one costing below £1,000.¹⁵

Whilst the Care Act places a duty on the Welfare authority, after a decade of austerity resources are limited, there are long waiting lists for assessment, and fewer people are getting access to support.¹⁶

Following Housing Corporation guidance issued in 1996 (see first section of this chapter) most minor adaptation work has been funded and carried out by housing associations themselves, which is the quickest and most effective way for it to be delivered. Allowing for inflation, the threshold of £500 set in 1996 would now be £1,000 which would bring it into line with the threshold set by social care.

Assessment of needs

In relation to assessment the accompanying Guidance to the Care Act states that:

“ An assessment must seek to establish the total extent of needs before the local authority considers the person’s eligibility for care and support and what types of care and support can help to meet those needs.”

The Act includes a nine point definition of wellbeing. Four of the nine elements used to assess eligibility under the Act have the potential to be improved by home adaptations:

- Maintaining personal hygiene
- Managing toilet needs
- Maintaining a habitable home environment

15 The Care and Support (Charging and Assessment of Resources) Regulations 2014.

16 ADASS Spring Survey 2021.

- Being able to make use of the home safely.

This holistic assessment of a person's needs is rooted in the context of their home and support network and supporting them to achieve their desired outcomes.

Housing Grants, Construction & Regeneration Act 1996 (HGCRA)

This legislation introduced the DFG in its current form and the administration of these grants is governed through the release of annual regulations called the Housing Renewal Grants Regulations. Over time much of the Act relating to housing improvement grants and area renewal has been repealed but all elements relating to the DFG remain in statute and the DFG remains the only mandatory grant which a local housing authority must give.

The Act outlines the purposes for which a grant must be given, establishes the criteria on which an award must be based and sets the maximum funding available.

The definition of disability is quite broad - a person is disabled if:

- their sight, hearing or speech is substantially impaired,
- they have a mental disorder or impairment of any kind, or
- they have a substantial physical disability by illness, injury or impairment.

It automatically includes any adult who is or could be registered under Section 77 of the

Care Act 2014. For children and young people, it includes those who are registered under paragraph 2 of Schedule 2 to the Children Act 1989 or is a disabled child as defined by Part III of the Children Act 1989.

The legislation makes no specific reference to housing association adaptations other than to state that all tenures are eligible to apply but that the end beneficiary (i.e. property owner) cannot be a public body which is the reason why ALMO and retained Council stock adaptations are funded differently. Some have subsequently registered as social landlords to develop properties outside of the original council stock area. Tenants in these properties can apply for a DFG in the same way as other housing association tenants.

Housing authorities are required to administer the DFG, consulting with the welfare authority where this is a different authority (i.e. county authorities). The local housing authority must decide that the adaptation is both 'necessary and appropriate to meet the disabled person's needs' and 'reasonable and practicable' (i.e. feasible) given the age and condition of the property.

Further advice about who should carry out assessments is given in a report by the Royal College of Occupational Therapists entitled 'Adaptations without delay'.¹⁷ This says that an OT assessment is not always needed but depends on the complexity of the person's situation and whether the housing solution is

¹⁷ Royal College of Occupational Therapists (2019) Adaptations without delay: A guide to planning and delivering home adaptations differently. London: RCOT.

complicated or straightforward (see Chapter 7 for further details). The consumer must always be at the centre of the process.

The local authority statutory and non-statutory role

The HGCR 1996 outlines the statutory role of local housing authorities. They must accept and approve an appropriately made DFG application and pay grant monies within the nominated timescales. Once an application has been formally submitted the local authority has to give a decision within six months and, once the grant is approved, work must be completed within 12 months.

Many local authorities provide a service which exceeds this statutory requirement and support disabled people through the application process using internal or external Home Improvement Agency (HIA) services or equivalent. As this element is not statutory it varies significantly between areas which can create difficulties for housing associations when advising their tenants, particularly if they operate over multiple local authority areas.

Additional services may include contractor identification and management, but again this can vary between areas and in many cases the 'contract' for completion of works remains between the DFG 'applicant' (i.e. the tenant) and the contractor with the HIA acting as 'agent' for the applicant. This again can present some challenges for Housing Associations both in terms of additional 'unknown' contractors completing works in their properties and

supporting their tenants, or when things go wrong either during or after works have been completed.

This potential conflict supports the need for clear protocols to be in place to avoid confusion for all involved and particularly the disabled person whose needs are being met.

Regulatory Reform Order 2002

The 2002 Order gave local authorities the power to use their allocation of DFG funding in alternative ways through the publication and implementation of an appropriate policy, often called a Housing Assistance Policy. The various guidance documents that have been produced have offered suggestions regarding how this funding could be used and in recent years there has been a significant increase in local authorities using these flexible powers to support disabled people to remain at home.

Examples of discretionary assistance which authorities have adopted include:

- Programmes to support hospital discharge.
- Removal of the means test for certain types of work or work under a specified value.
- Additional funding where works exceed the mandatory £30,000 grant limit.
- Funding to pay assessed contributions where an applicant is in financial hardship.
- Specific 'fast-track' grants.
- Grants for specialist items or conditions such as a 'Dementia Grant'.

However, whilst these powers have been widely

adopted across the country there is significant variation. This can create a ‘post-code’ lottery effect for housing associations who are dealing with multiple local authorities all with slightly different policies and grant regimes for their tenants to navigate.

Guidance on landlord applications 1996

The 1996 legislation allows for an application for a DFG to come either from a tenant or a landlord. Most applications currently come from the tenant, but a grant cannot be awarded without the landlord’s permission to carry out the works. Under the Equality Act 2010 a landlord must make ‘reasonable adjustments’, but obtaining permission often leads to delays.

The 1996 Act covers landlord applications and the accompanying 1996 guidance and a general consent in 2008 gives further details.

These include:

- The means test does not apply (although when deciding the amount of grant to award local authorities need to consider the extent to which the landlord is able to charge a higher rent for the property as a result of the works).
- Councils are allowed to reclaim specialised equipment when no longer needed, such as stairlifts.
- The local authority could secure nomination rights to the property for a period of 5 years under the grant conditions.¹⁸

• Local authorities can also take account of other policies contained in their published strategies for private housing.

“ In determining the amount of grant (if any) where they approve an application to which section 31 of the Act applies (determination of amount of grant in the case of landlord’s application), the local housing authority shall take into account, in addition to the matters referred to in section 31(3)(a) of the Act, such other matters as seem to them to be relevant in all the circumstances, having regard in particular to any relevant policy contained in their published renewal strategy (if any) for private sector housing in their area.”¹⁹

Up to now landlord applications have not been used extensively. However, they could be an effective way of speeding up the process for housing association tenants, reducing the administrative burden for local authorities, improving communication, and giving landlords more control over adaptation delivery. These issues are looked at in more detail in Chapters 6 and 7.

Refusing adaptations and asking tenants to move

In some circumstances landlords may wish tenants to move home rather than adapt the existing residence but, in the guide ‘Your rights

18 The Housing Renewal Grants (Additional Conditions) (England) General Consent 1996.

19 The Housing Renewal Grants (Landlord’s Applications) (England) Direction 1996, p. 262.

to accessible and adaptable housing', the Equality and Human Rights Commission (2018) stated that:

“ If you have good reasons to want to stay in your home, you should explain exactly what these are – especially if this is because of your impairment or health condition and ability to live independently, or because of the needs of other members of your household (e.g. if you need to be near carers or in a familiar environment). You can still apply for a Disabled Facilities Grant and your landlord cannot refuse to give you permission for the adaptations without good reason.”²⁰

The UK Government is also signed up to the United Nations Convention on the Rights of Persons with Disabilities. This states that:

“ Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement.” (Article 19).

This means that tenants cannot be pressured into living in a shared house or sheltered housing scheme rather than general needs accommodation.²¹

Whilst the above is neither legislation nor formal guidance it is supported by the High Court Ruling, *McKeown vs LB Islington* which stated that:

“ This is the point that the Claimant’s need to leave her home would be more suitably met by a move to wheelchair accessible accommodation. For reasons which will be apparent from §§18-20 with regard to my conclusion that the application for the DFG for a council tenant must be considered on the same basis as an application from an owner occupier and that what is being considered is the need to access the dwelling which the applicant occupies as his/her home, in my judgment it is not lawful to refuse a DFG on the ground that the Claimant must move her home.”²²

Whilst the ruling references a council tenant, the same principle applies to tenants of housing associations, that it is not lawful to refuse a DFG on the grounds that a tenant must move. Eligibility for the DFG is tenure neutral so people from all tenures must be treated in the same way.

There is also a court judgement relating to leaseholders. In 2019 Cardiff County Court ruled in favour of a disabled leaseholder who had been refused permission to completed

20 Imogen Blood and Associates (2018) Your rights to accessible and adaptable housing in England, London: Equality and Human Rights Commission.

21 Imogen Blood and Associates (2018) Your rights to accessible and adaptable housing in England, London: Equality and Human Rights Commission.

22 *McKeown, R (On the Application Of) v London Borough of Islington* [2020] EWHC 779 (Admin) (02 April 2020).

adaptations to her home.²³ These works were to be privately funded. The ruling found in favour of the leaseholder and that she had the right to make these alterations to her home under the ‘reasonable adjustment’ requirements of the Equality Act 2010.

Charter for Social Housing Residents 2020

The Grenfell Tower fire in June 2017 raised critical questions about how tenants’ voices are heard. The 2020 Charter set out ways to transform the sector by increasing accountability, providing better consumer standards, and delivering swift and effective resolution of complaints.²⁴

- The Housing Regulator continues its role to ensure that registered housing providers are financially viable, properly managed and delivering value for money. However, proactive consumer regulations have been added to ensure that tenants’ views are taken into account.
- Home adaptations and the DFG involve both housing associations and local authorities which means that responsibility for dealing with complaints is split between the Housing Ombudsman and the Local Government and Social Care Ombudsman. They can now do joint investigations and explore the deeper systemic issues underlying complaints.
- There will be routine inspections of landlords with over 1,000 homes every four years to

ensure they are complying with new consumer standards.

Adult Social Care Reform White Paper 2021

In December 2021 the government released ‘People at the Heart of Care’ a White Paper on adult social care reform.²⁵ The central theme is that people should have choice, control and support to live independent lives. Wherever possible care should be in a person’s own home, requiring closer working between health, social care and housing. Prevention and early intervention need to be a much stronger element of strategy.

Home adaptations are a key part of that strategy:

“**Ensure people can adapt their homes and access practical tools and technology, in order to live independently and live well in their own home.**” Page.16.

The white paper announced:

- **£570 million per year for 2022/23 to 2024/25 to deliver the DFG.**
- **Updated government DFG guidance** - to advise local authorities on the efficient and effective delivery of DFGs.
- **A fund to deliver minor repairs and adaptations** – allowing more handyperson services to be developed.
- **£300 million to integrate housing into local**

23 Smailes & Poyner-Smailes v Clewer Court Residents Ltd, Case Number B02BS101 (2019).

24 Ministry of Housing Communities and Local Government (2020) The Charter for Social Housing Residents: Social Housing White Paper.

25 Department of Health and Social Care (2021) People at the Heart of Care: Adult social care reform white paper.

health and care strategies - and increase the range of supported housing options.

Consultation will look further at:

- DFG funding amounts allocated to each local authority - to better align allocations with local need.
- The maximum amount a DFG can pay for a single adaptation – currently set at £30,000.
- How best to align the DFG means test with new social care charging arrangements.²⁶

National Disability Strategy 2021

The National Disability Strategy published in 2021 aims for more joined up responses by government to issues that affect disabled people.²⁷ In relation to housing, it acknowledges that there is still much further to go in improving the accessibility of homes in England and that the framework to deliver new accessible housing will be improved.

Section 36 of the Equality Act 2010

The Disability Strategy announced that Section 36 of the Equality Act 2010 will be enacted to allow adaptations to common areas (such as entrances, hallways, and stairs) to make it easier for disabled people to enter and leave their homes.

An overview of funding

As this chapter has shown, over the last 30 years many different strands of legislation, regulation and guidance have been introduced

that cover the adaptation of homes, the rights of tenants, and the responsibilities of landlords and local authorities. It makes for a complex picture. Overall responsibility for older and disabled people rests with local authorities, but housing associations have duties to their tenants under equalities legislation, housing regulation and guidance, and through case law.

There are a range of funding sources subject to different eligibility criteria, means testing and other conditions. Each authority has also developed their own ways of addressing local need, resulting in a patchwork of different funding arrangements and service provision. Figure 2.2 provides a summary of all the main funding sources for home adaptations.

This report focusses on housing associations' own funding and their use of mandatory and discretionary DFG resources. It looks at how funding levels are decided, how services are delivered and the partnership arrangements between associations and local authorities. In some places services work exceptionally well, but in others there are barriers and delays.

The aim is to suggest ways in which resource levels and service pathways could be improved to make the process of getting adaptations, or a move to a new home, quicker and easier for tenants. Before moving on to look at current funding and delivery in detail, it is important to look at why adapting homes is so important in the housing association sector.

26 UK Parliament (2021) Health and Social Care Levy, House of Commons Library Research Briefing.

27 Cabinet Office Disability Unit (2021) National Disability Strategy, CP 512.

Figure 2.2 Sources of funding for home adaptations



- 1. Housing associations** – some have substantial budgets, but most only do minor adaptations. Adaptation work is also done as part of major improvement projects.
- 2. Retained council stock and ALMOs** – are covered by the DFG legislation but, as public bodies, use funding from their Housing Revenue Accounts.
- 3. Mandatory Disabled Facilities Grant (DFG)** - provides funding for more major changes to homes in the private sector. Central government allocations are passed to individual local authorities through the Better Care Fund (BCF). The DFG is usually means-tested (children are exempt), but as resources have increased some authorities have removed the test in certain cases.
- 4. Discretionary DFG funding** – provided in some areas to meet the aims of the Better Care Fund or local needs as specified in an approved policy.
Minor repairs and adaptations - new funding 2022/23 to be delivered by handypersons.
- 5. Integrated Community Equipment Service (ICES)** – joint health and social care funding to supply aids, equipment and minor adaptations (subject to eligibility criteria) on leaving hospital, during illness, to facilitate independence or to meet care needs.
- 6. Top up funding** - the upper limit of the DFG is often not enough to pay for substantial adaptations. Housing authorities do not have a duty to meet costs above the level of grant to which applicants are entitled. Housing associations, social care and health may be asked to contribute.
- 7. Tenants** – tenancy agreements usually allow tenants to make their own improvements/adaptations.

SUMMARY: FINANCIAL, LEGAL AND REGULATORY ENVIRONMENT

Home adaptations funding and delivery is covered by a confusing patchwork of legislation, regulation, guidance and case law.

- **Direct adaptation funding for housing associations was gradually withdrawn** at the same time that large amounts of stock was being transferred into the sector. It has left a confusing legacy with some associations funding and managing all their own adaptation work, others paying into the DFG, while others use the DFG but make no contribution.
- **Partnership arrangements** - some authorities and associations have developed and maintained good partnership arrangements, but protocols are becoming less common as associations merge and grow.
- **Equality Act 2010** - services are to be provided free from discrimination and tenants have the right to 'reasonable adjustments' to their homes and any communal areas.
- **Regulatory Framework for Social Housing** states that landlords must understand different tenants needs in relation to equality legislation and co-operate with other organisations to provide an adaptations service that meets tenants' need.
- **Chronically Sick and Disabled Persons Act 1970 and the Care Act 2014** gave social care services the duty to support disabled people, including through alterations to their home. Although these acts cover assessment, provision of equipment, and some minor adaptations up to a £1,000 threshold, pressure on budgets has reduced access to support.
- **1996 guidance for housing associations to fund minor adaptations** using their own resources. When adjusted for inflation, the £500 threshold set in 1996 would now be a minimum of £1,000.
- **Housing Grants, Construction & Regeneration Act 1996 (HGCRA)** introduced the DFG in its current form and outlines the purposes for which the grant is given. Authorities must approve applications and pay grant monies within specified timescales.
- **No statutory duty to provide a full agency service** – however, many authorities support tenants through the process of applying for a grant and getting the work completed.
- **Regulatory Reform Order 2002 allowed local authorities discretion** in the way they use their DFG allocation, provided they meet their statutory responsibilities and develop a policy. Some areas have removed the means test for certain cases and introduced discretionary grants, creating a 'post-code lottery' for associations dealing with multiple authorities.
- **HGCRA legislation allows for an application for a DFG to come either from a tenant or a landlord.** Most applications currently come from the tenant, but a grant cannot be awarded without the landlord's permission to carry out the works. This report recommends landlord applications to reduce delays, improve communication and give landlords more control.
- **Adult Social Care Reform White Paper 2021** provided assurance that DFG funding will be

maintained at £570 million per year until 2024/25, there will be new guidance, consultation on the upper limit/means test/allocation formula, and additional funding for handypersons.

- **Case law** has shown that it is not lawful to refuse a DFG on the grounds that a tenant must move home as eligibility for the DFG is tenure neutral. It means that social housing tenants must be treated the same way as owner occupiers.
- **Charter for Social Housing Residents 2020** aims to ensure that tenants' views are taken into account, there are better consumer standards, fast and effective resolution of complaints, and inspections of associations with more than 1,000 homes every four years.
- **National Disability Strategy 2021** aims for a more joined up response by government to issues that affect disabled people and that Section 36 of the Equality Act 2010 will be enacted to allow adaptations to common areas (e.g. entrances, hallways, and stairs).



3. IMPORTANCE OF HOUSING ASSOCIATIONS FOR DISABLED PEOPLE

3. The Importance of Housing Associations for disabled people

The term ‘housing association’ describes a sector that is very varied, ranging from local organisations with just a few hundred homes through to national companies with over 50,000 properties. There are differences in governance arrangements and operating models with the larger organisations having stock across over more than 100 local authorities.

The sector has changed, moving from its original philanthropic and charitable roots to a more hybrid sector, parts of which are now more commercially driven. Many have moved into delivering homes at affordable rather than social rents, alongside low cost and shared ownership, with some homes sold at market rates. Some are also developing for-profit vehicles or working with for-profit providers.

Until recently the focus has tended to be on the delivery of new homes rather than the condition and accessibility of the existing housing stock or the well-being of tenants. A rigorous reporting system aimed to minimise financial risk by focussing on efficiency and value for money. It resulted in housing organisations becoming more property-driven than resident-orientated.

This has had major consequences for disabled and older tenants. They make up more than half of all tenants, but they have often been invisible to decision-makers, with major policy changes, such as the removal of direct funding for adaptations, failing to take their needs into account.²⁸

The following section shows why the housing association sector is vitally important to disabled people of all ages and how a new emphasis on better ways of delivering adaptation services could make an enormous difference to many tenants’ lives.

²⁸ Mackintosh, S. and Heywood, F. (2015) The Structural Neglect of Disabled Housing Association Tenants in England: Politics, Economics and Discourse, *Housing Studies*, 30:5, 770-791. <https://doi.org/10.1080/02673037.2015.1044947>.

The high proportion of disabled people in social housing

The social housing sector (local authorities and housing associations) provides homes for a much higher proportion of disabled people than other tenures. More than half of households (54%) have someone with a long-term illness or disability (Figure 3.1) and around 7% of households contain a wheelchair user (Figures 3.2). The most common impairments relate to mobility (43%), stamina (37%) and mental health (34%) and it is estimated that around half of people with long term conditions or impairments experience substantial difficulty with day-to-day activities.^{29 30}

Almost a fifth (18%) of new lettings in 2019/20 were to households with specific disability-related housing needs, such as wheelchair access, mobility, and visual or hearing impairment.³¹

The sector is important because so many disabled people are on low incomes and everyday expenses are 25% higher on average, with £583 extra per month being spent on

transport, specialised equipment, and carers compared to non-disabled people. Most three quarters of disabled and older social renters are in the bottom 40% of the income distribution and around half the 14 million people living in poverty in the UK are in families with a disabled person.^{32 33}

The Equality and Human Rights Commission's research into the 'Hidden Housing Crisis' identified that disabled people face major problems finding adequate housing which creates a barrier to independent living.³⁴

Low incomes mean that they are much less likely to own their home. More than a quarter of disabled people aged 16-64 rent social housing in contrast to under 8% of non-disabled people.³⁵

The social housing sector makes up only 17% of all homes but houses 27% of all disabled people and 34% of wheelchair users.

29 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Social rented sector 2019-20, Annex Table 1.14.

30 Department of work and pensions (2021) Family Resources Survey: financial year 2019 to 2020.

31 Regulator of Social Housing (Oct 2019) Private registered provider social housing stock in England – stock profile 2018-2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832536/PRP_social_housing_stock_in_England_2018-19_-_stock_profile.pdf.

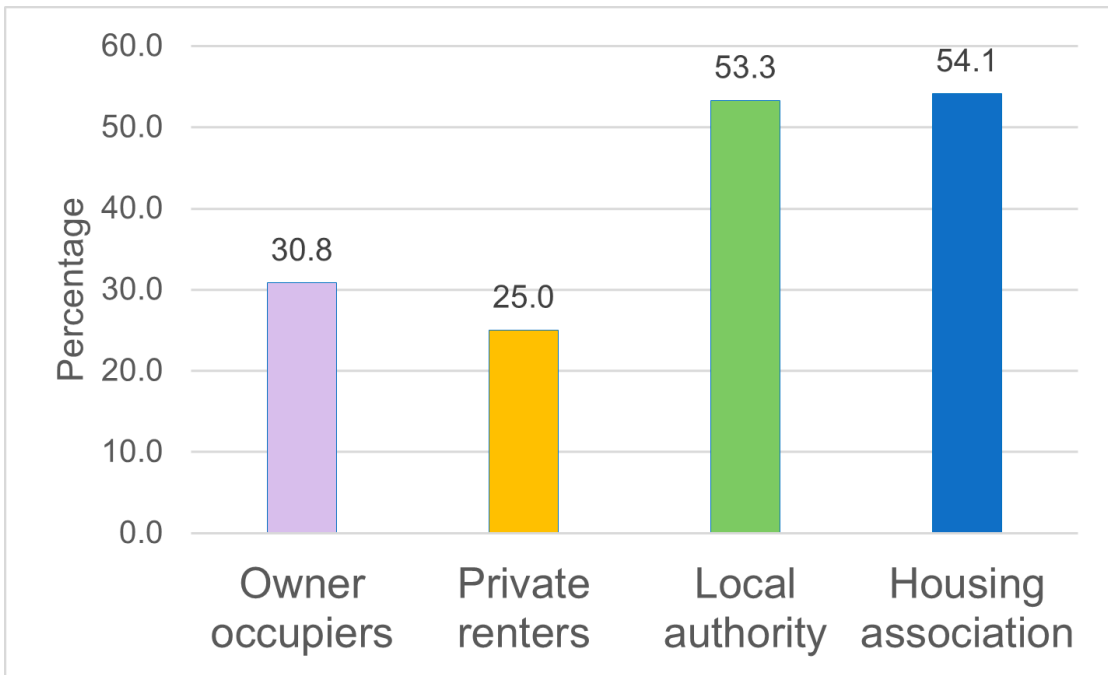
32 Ministry of Housing Communities and Local Government (2018) A new deal for social housing, Cm 9671.

33 Evan, J., Thomas, G. and Touchet, A. (2019) The Disability Price Tag 2019, London: Scope. Outcomes for disabled people in the UK: 2020 <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2020>

34 Equality and Human Rights Commission, 2017, Being disabled in Britain: A journey less equal, London: EHRC, <https://www.equalityhumanrights.com/sites/default/files/being-disabled-inbritain.pdf>.

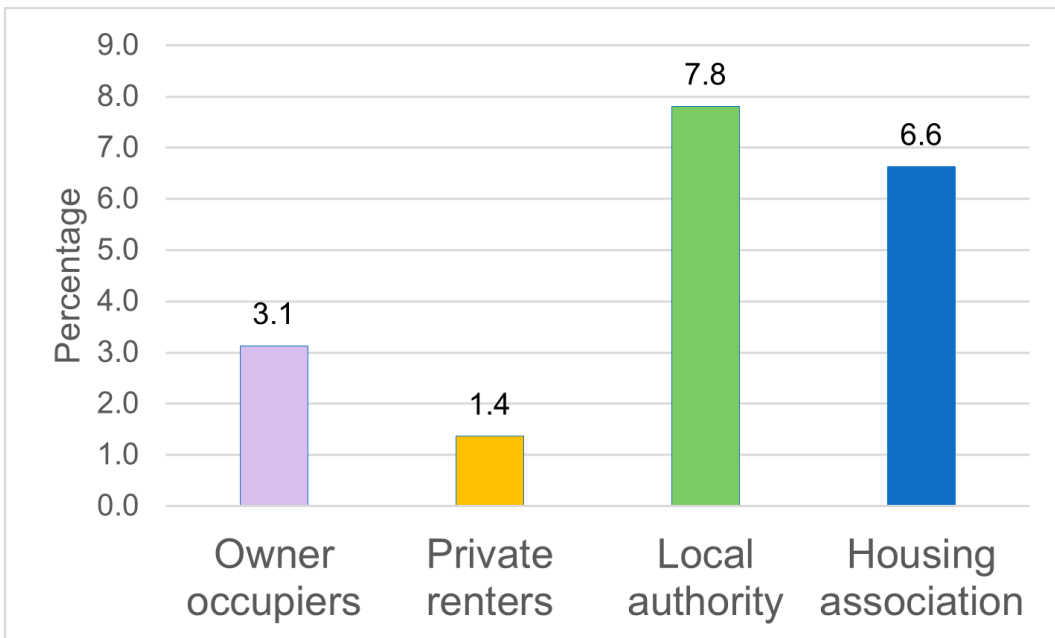
35 Outcomes for disabled people in the UK: 2020 <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2020>.

Figure 3.1 Households including someone with long term illness or disability, by tenure, 2017-18



Source: English Housing Survey Social Rented Sector Report 2017-18, Chapter 1 Annex Table 1.5

Figure 3.2 Presence of a wheelchair user, by tenure 2017-18



Source: English Housing Survey 2018-19: Adaptions and accessibility factsheet, Annex Table 7

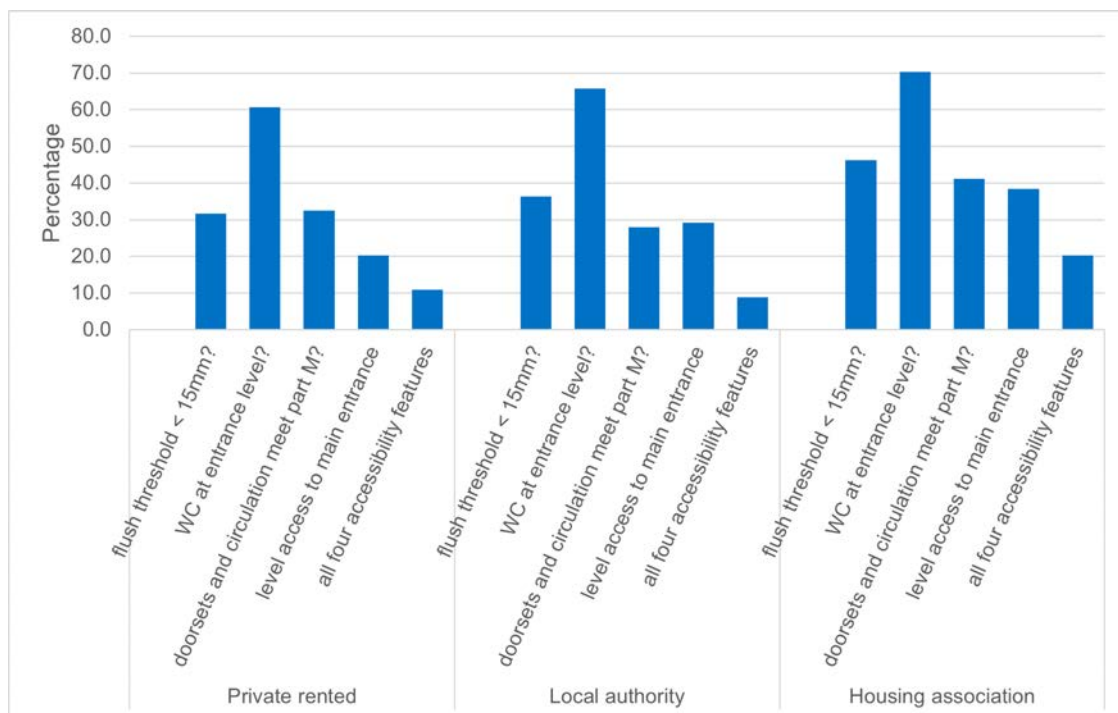
Accessible homes

Housing associations have made great strides in developing extra care, and retirement housing for people over 55 years of age, with many developments using the HAPPI principles of good design.³⁶ Some associations have also pioneered the use of good, accessible design for disabled people of all ages.

Housing associations have more homes with accessibility features than the council stock or the private rented sector. For example, 70% of homes have a WC at entrance level and 46% have level thresholds. However, 71% percent of housing association homes were built prior to 1991 when lifetime home standards were introduced.³⁷ Only 20% have all four of the main accessibility features (Figure 3.3).

The need for more accessible homes is clear. The 2019-20 English Housing Survey showed that 21% of housing association households with at least one person with a long-standing health condition said their accommodation was unsuitable.³⁸

Figure 3.3 Accessibility features by rental tenure 2018-20



36 Park, J. and Porteus, J. (2018) Age-friendly housing, London: RIBA.

37 Ministry of Housing Communities and Local Government (2020) English Housing Survey: Headline Report, 2019-20 Table AT2.1.

38 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Home adaptations report 2019-20.

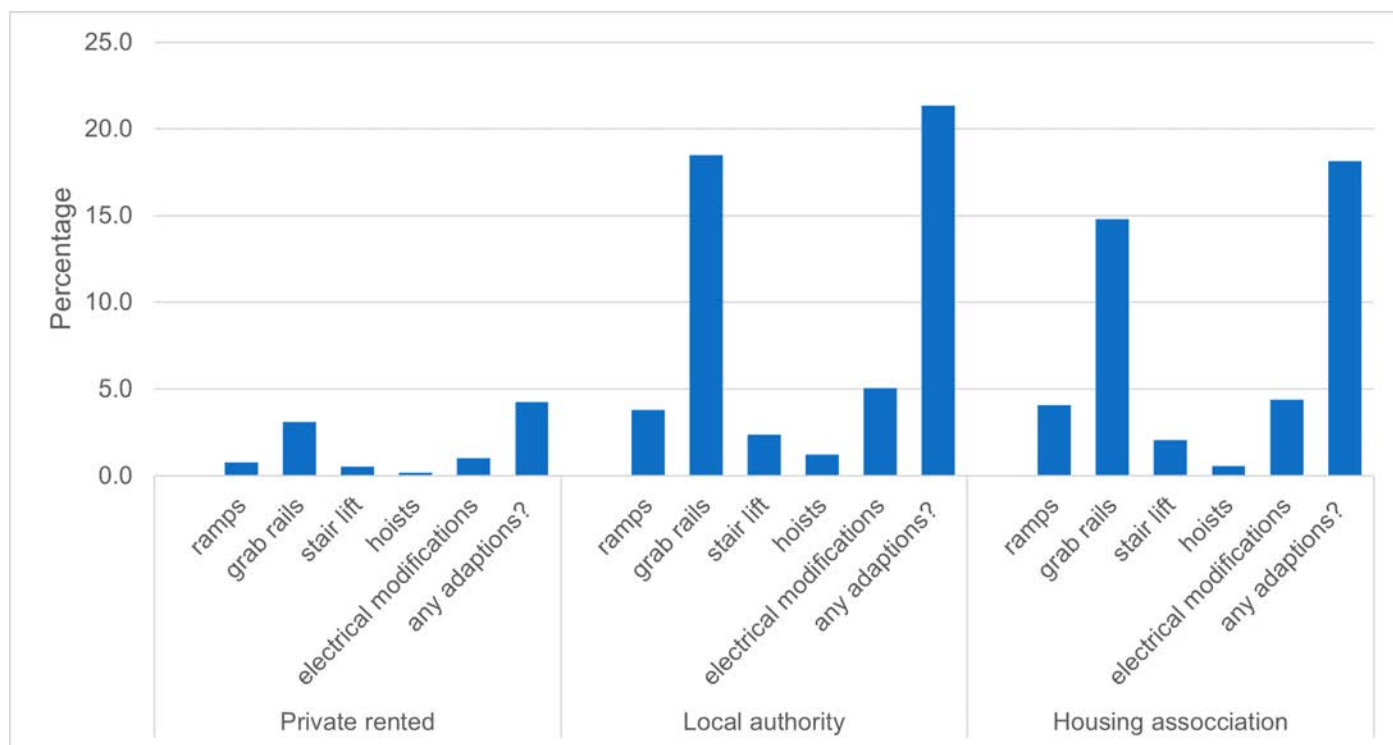
Adapted homes

The proportion of housing association tenants with a long standing condition that lacked the adaptations they need has risen from 50% to 56% in the last five years.³⁹

The English Housing Survey estimates that there are adaptations in around 18% of housing association homes, predominantly minor adaptations such as grab rails (Figure 3.4). The proportions in housing association homes are far higher than the private rented sector but less than the council stock.

About 20,000 housing association properties in England are adapted annually using the DFG, a total investment of just over £200 million a year. The most common major adaptations are the replacement of baths with showers, followed in importance by stairlifts and ramps. In 2019-20 half of approvals for DFGs in housing association homes cost less than £5,000, and most of the rest between £5,000 and £15,000 (Figure 3.5). There are only a few very expensive adaptations each year costing over £15,000.

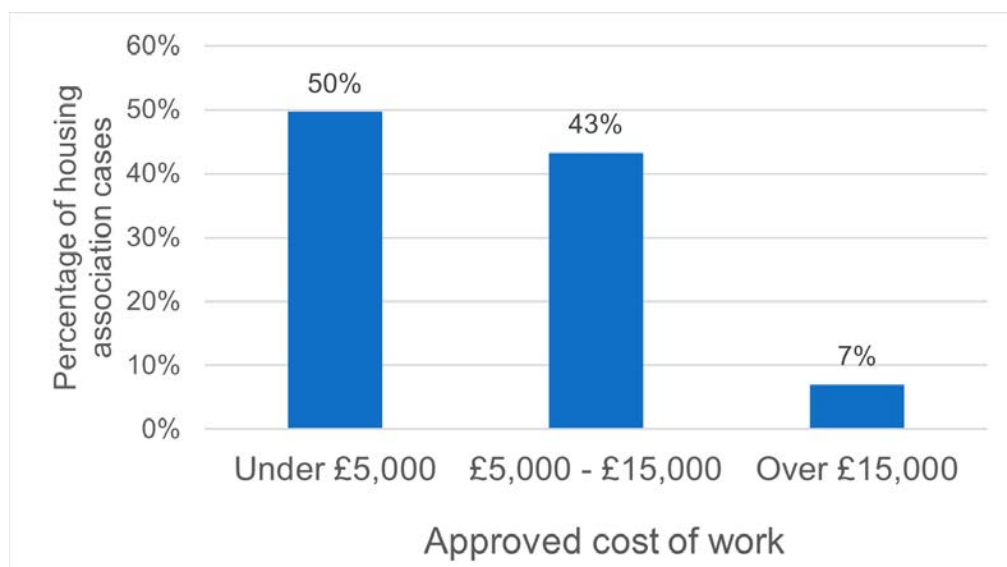
Figure 3.4 Adaptations by rental tenure



Source: English Housing Survey 2018-19: Adaptions and accessibility factsheet, Annex Table 2.

39 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Home adaptations report 2019-20.

Figure 3.5 Percentage of DFGs approved for housing association residents by cost



Source: Foundations

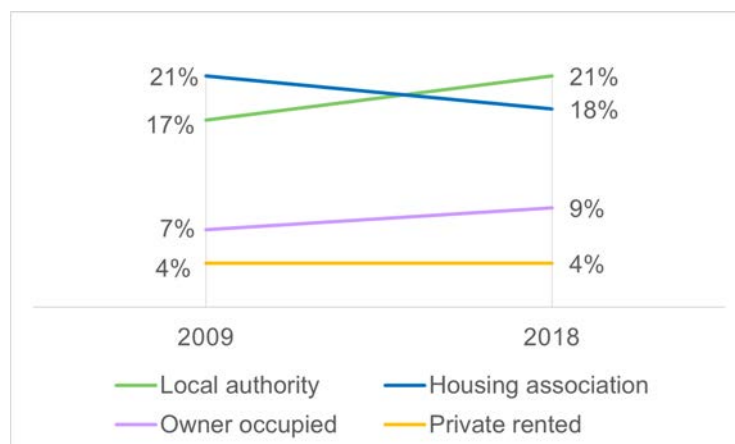
Despite considerable investment from housing associations, and from central government via the DFG, the proportion of housing association homes with adaptations has gone down from 21% to 18% in the last decade according to the English Housing Survey (Figure 3.6). This contrasts with the council stock where adaptations have increased.

Despite considerable investment, the proportion of housing association homes with adaptations has gone down from 21% to 18% in the last decade.

The proportion of housing association tenants with a long standing condition that lacked the adaptations they need has risen from 50% to 56% in the last five years.

The underlying reasons for the decline in adapted properties are discussed further in Chapter 7 but may be due to limited minor works budgets, or fixtures and fittings being removed at change of tenure. The reduction in adapted properties is of great concern when such a high proportion of tenants have disabilities, and when so many are unsuitably housed or lack the adaptations they need.

Figure 3.6 Trends in adapted homes 2009-2018



Source: English Housing Survey 2018-19: Adaptions and accessibility factsheet.

Diversity of people needing home adaptations

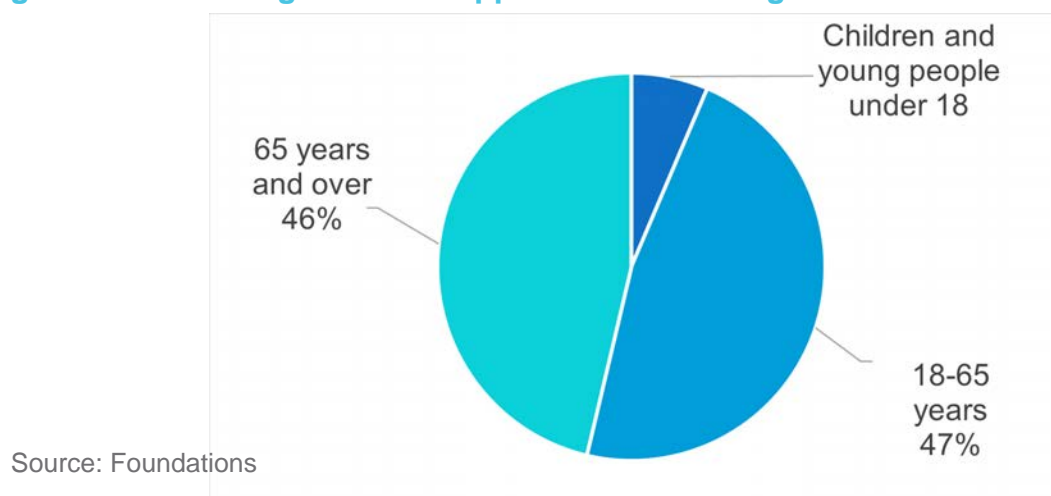
Older people are a key group who need home adaptations. Almost 44% of social housing tenants are 55 and over and the average age of all tenants is 52.⁴⁰ Although most people will remain fit and active well into later life, those who have struggled with a lifetime of low incomes, or hazardous working conditions are more likely to become be disabled. People in the lowest third in terms of wealth have fewer years of disability-free life and become frailer 10 years earlier than those in wealthier groups.^{41 42}

Most would not describe themselves as disabled, but that they are just getting old. Around 16% of people aged over 65 have difficulty with at least one activity of daily living (such as

washing, bathing, dressing, eating, and going to the toilet), and by their late 80s more than one in three have problems doing all these unaided.⁴³ In addition, one in five people aged 75 and over, and half of those aged 90 and over, have sight loss that significantly impacts their daily lives.⁴⁴

All of us want to remain active and independent for as long as possible, and if we do become frail or infirm, we want to retain our dignity and do as many personal tasks as possible without help. Fitting adaptations can keep people independent for longer. However, over the last five years there has been an increase in the number of people over 75 who lack the adaptations they need.⁴⁵ In 2019/20 people over 65 received just under half of all DFGs approved for housing association tenants (Figure 3.7).

Figure 3.7 Percentage of DFGs approved for housing association tenants by age 2019/20



40 Ministry of Housing Communities and Local Government (2020) English Housing Survey 2019/20.

41 MICRA (2017) The Golden Generation: Wellbeing and Inequalities in Later Life, Manchester: University of Manchester Institute for Collaborative Research on Ageing.

42 Marmot, 2020; CFAB report State of Ageing in 2020

43 Fam Res Survey

44 Thomas Pocklington Trust (2020) Good Housing Design – Lighting: A practical guide to improving lighting in existing homes, London: TPT.

45 Ministry of Housing Communities and Local Government (2021) English Housing Survey: Home adaptations report 2019-20.

People of working age

Almost half of DFG approvals for housing association tenants are for people of working age (Figure 3.7 above). About 80% of disabilities are acquired between the ages of 18-64, but this is the group that is more likely to be in homes that do not match their needs. The English Housing Survey showed that people under 55 were more likely to say their home was unsuitable than older tenants.⁴⁶ A 2021 survey by Shelter indicated that more than half (54%) of people with a significant impairment did not have a safe or secure home compared with 30% of people without.⁴⁷

The after-effects of the Covid-19 pandemic may increase the need for home adaptations in this age group. Disabled people were badly impacted during lock-downs and those worst affected by longer term symptoms ('long-Covid') are people of working age in lower socio-economic groups.⁴⁸ The after effects of the pandemic may increase the need for home adaptations over the next few years. A survey commissioned by Habinteg showed that:

“ Disabled respondents were over three

times more likely than non-disabled people to report that the inaccessibility of their home undermined their wellbeing during lockdown” and “were 17 times more likely than nondisabled people to be unable to carry out all daily tasks and activities at home without assistance during lockdown.”⁴⁹

There is an economic cost to unsuitable housing. An accessible home is the foundation for education, employment and an escape from poverty. People of working age with an unmet need for accessible housing are four times more likely to be either unemployed or not seeking work compared to disabled people without accessible housing needs.⁵⁰ People need to be able to get in and out of their homes easily to get to work or have a suitable environment to be able to work or study at home. Like everybody else disabled people want to be able to live a full life.

Children and young people with disabilities

Around 8% of children and young people in the UK have a disability.⁵¹ Alongside physical disabilities there are significant numbers with learning disabilities, cognitive conditions, or who have autism.

46 Ministry of Housing, Communities and Local Government (2016) English Housing Survey Adaptations and Accessibility Report, 2014-15.

47 Shelter (2021) Denied the right to a safe home, London: Shelter

48 Office of National Statistics (Apr 2021) Prevalence of ongoing symptoms following coronavirus (COVID-19) infection in the UK: 1 April 2021.

49 <https://www.habinteg.org.uk/download.cfm?doc=docm93jjjm4n2734>.

50 Provan, B., Burchardt, T. and Suh, E (2016) No Place like an accessible home, CASE report 109, London: LSE.

51 Department of work and pensions (2020) Family resources survey 2018/19. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874507/family-resources-survey-2018-19.pdf.

Almost a third (32%) of disabled children are in lone-parent families compared to 22% of all families.⁵² Low incomes, isolation, and lack of support lead to high levels of family breakdown.⁵³ Home adaptations can make a significant difference to the pressures facing these households who are some of the worst housed.

Previous studies have identified that space in the home is the biggest need. It allows for a calmer environment, independence for the child, respite for siblings and family members, and storage of bulky equipment.⁵⁴

Figure 3.8 (above) shows that 7% of DFGs approved for housing association tenants went to children and young people. This is less than might be expected given the importance of social housing for these families, although some may have been helped to move.

Minority ethnic groups

There was evidence of higher levels of limiting long-term illness in minority ethnic groups even before Covid. They appear to have fewer adaptations than white households and are twice as likely to have no adaptations at all.⁵⁵ They may find it harder to know what services available. Perceived shame about disability

may make them less willing to seek help.

Carers

About 17% of adults are carers and around three in five of us will become carers at some point in our lives.⁵⁶ Carers are more likely to report having a long-term condition, disability or illness themselves than non-carers.⁵⁷ Home adaptations, or moving to a more suitable home, have a significant effect by removing stress and risk of injury, restoring independence, and relieving feelings of isolation and depression.

Multiple conditions and more people remaining at home

Mental health problems, particularly depression, are often found alongside chronic physical impairments. Visual or hearing impairments may occur alongside other conditions, and cognition problems, particularly dementia, are also increasing. Obesity is also increasing which can lead to loss of mobility and other impairments.

There are fewer long stay hospital beds and people are more likely to be discharged home quickly after a hospital stay. There are many simple adaptation solutions, but the DFG Review 2018 identified that many adaptations

52 <https://www.papworthtrust.org.uk/about-us/publications/papworth-trust-disability-facts-and-figures-2018.pdf>.

53 Contact a Family (2012) Forgotten Families: The impact of isolation on families with disabled children across the UK.

54 Morgan, D., Boniface, G. and Reagon, C. (2016) The effects of adapting their home on the meaning of home for families with a disabled child, *Disability & Society*, 31:4, 481-496, DOI: 10.1080/09687599.2016.1183475.

55 Ewart, I. and Harty, C. (2015) Provision of Disability Adaptations to the Home: Analysis of Household Survey Data, *Housing Studies*, 30:6, 901-923, DOI: 10.1080/02673037.2014.991379.

56 Carers UK (2019) Facts about carers. https://www.carersuk.org/images/Facts_about_Carers_2019.pdf.

57 Carers UK op cit.

are getting more complex, expensive and time consuming to implement.⁵⁸

Focussing on prevention

There is a growing body of evidence to show that the decision to modify a home, or move to more suitable accommodation, is better if it happens earlier, rather than when an individual is at 'crisis' point following a fall, injury, or return from hospital, or if care breaks down. There is a corresponding negative impact if there are delays in the process, or if someone does not get help and remains living in an inappropriate home for an extended period.

For older people there is a need to focus on helping people remain fit and well at home for as long as possible and our homes need to suit our changing needs as we age. This will prevent people needing hospital and care provision and meet the aims of the government's Healthy Ageing Challenge of five more years of independent living.

People with rapidly progressing conditions such as motor neurone disease or needing palliative care require urgent help with adaptations or a

move to a more suitable home.⁵⁹

The benefits of a preventative approach to adaptations include the following:

- **Mental health**

Disabled people can experience serious deterioration in their mental wellbeing due to living in unsuitable accommodation.⁶⁰

By restoring dignity and enabling more independence adaptations reduce depressive symptoms.⁶¹ Helping people manage in their home and allowing access to the outside world helps to prevent loneliness and isolation in both disabled people and their carers.

- **Activities of daily living and reducing falls**

Simple, minor home aids and adaptations, such as grabrails and extra stair rails, significantly reduce difficulties with activities of daily living and help to reduce falls.^{62 63} A study published in 2021 followed two groups, one with, and one without minor adaptations (such as handrails, grab rails, improved lighting and slip resistant surfaces) at an average cost of £300. The households with adaptations had a 31% reduction in the rate of fall injuries at home per year compared to those without, and well targeted interventions had an even

58 Mackintosh, S., Smith, P., Garrett, H., Davidson, D., Morgan, G. and Russell, R. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England.

59 Munro, E. (2019) Act to Adapt: Access to home adaptations for people with motor neurone disease, Northampton: MNDA.

60 Equality and Human Rights Commission (2018) Housing and disabled people: Britain's hidden crisis https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf

61 Centre for Ageing Better (2018) Homes that Help, London: Centre for Ageing Better.

62 Powell, J., Mackintosh, S., Bird, E., Ige, J., Garrett, H., and Roys, M. (2018) The role of home adaptations in improving later life

63 Public Health England (2018) A return on investment tool for the assessment of falls prevention programmes for older people living in the community. London: PHE.

greater impact.⁶⁴

- **Quality of life and confidence**

When a shower is installed, ease of use, safety and feeling clean give people confidence and a greater quality of life, however, fear of falling increases the longer the wait.^{65 66}

- **Reducing the need for care**

Adaptations reduce pressures on carers and in some cases remove the need for care entirely giving carers back their own independence.⁶⁷ One study showed that home modifications allowed a 46% reduction in informal care and 16% reduction in formal care.⁶⁸

- **Longer period in own home**

Home adaptations allow older people stay in their homes for around four years longer before going into residential care.^{69 70}

- **Restoring normal life for younger disabled people**

For younger disabled people, unsuitable housing means that physical capacity,

economic activity, relationships and mental health all suffer, while an adapted or accessible home restores a sense of normality, independence, ability to work and to have a family life.⁷¹

- **Huge cost savings for children with complex needs**

The cost savings for children and families can be very significant if children can remain safely at home. A study of a small number of families with children with complex needs estimated that 14 years of costs as a 'looked after child' were avoided saving around £1.5 million compared to an average cost of £60,000 for each home adaptation.⁷²

Overcoming reluctance to adapt

Despite the benefits of altering the home, many people do not plan ahead, and tenants are often reluctant to ask for help from their landlord. A 2021 report showed that older people renting socially and privately felt they

64 Keall, M., Tupara, H., Piers, N., Wilkie, M., Baker, M., Howden-Chapman, P. and Cunningham, C. (2021) Home modifications to prevent home fall injuries in houses with Māori occupants (MHIPI): a randomised controlled trial, *The Lancet Public Health*, Vol 6, Issue 9, E631-E640, DOI: [https://doi.org/10.1016/S2468-2667\(21\)00135-3](https://doi.org/10.1016/S2468-2667(21)00135-3).

65 Whitehead, P., Golding-Day, M., Belshaw, S., Dawson, T., James, M. & Walker, M., (2018) Bathing Adaptations in the Homes of Older Adults (BATH-OUT): Results of a Feasibility Randomised Controlled Trial (RCT), *BMC Public Health*. 18, 1293.

66 Whitehead et al Qual survey

67 Centre for Ageing Better (2018) *Homes that Help*, London: Centre for Ageing Better.

68 Carnemolla, P., Bridge, C. (2019) Housing Design and Community Care: How Home Modifications Reduce Care Needs of Older People and People with Disability. *Int J Environ Res Public Health*. 2019 Jun 1;16(11):1951. doi: 10.3390/ijerph16111951. PMID: 31159396; PMCID: PMC6604004.

69 Foundations (2016) *Linking Disabled Facilities Grants to Social Care Data*. <http://foundationsweb.s3.amazonaws.com/4210/foundations-dfg-foi-report-nov-2015.pdf>.

70 Kempton, O. and Warby, A. (2011) *Measuring the Social Return on Investment of Stage 3 Adaptations and Very Sheltered Housing in Scotland*.

71 Smith, B. and Caddick, N. (2016) *The health and wellbeing of spinal cord injured adults and the family: Examining lives in adapted and unadapted homes*, Aspire and Loughborough University.

72 Clements, L. and McCormack, S. (2017) *Disabled Children and the Cost Effectiveness of Home Adaptations & Disabled Facilities Grants: A Small-Scale Pilot Study*, Leeds: Cerebra, University of Leeds.

had “less agency to change the situation” and were afraid of annoying their landlords.⁷³

Reasons for being reluctant to adapt their homes include:^{74 75}

- Unwillingness to look ahead to a potential deterioration in health or mobility.
- Perception that their landlord will be unwilling to give permission.
- Concern that landlords do not value homes for what they mean to people emotionally.
- Feeling that it will be a long-drawn out process.
- Not wanting their home to look ‘disabled’ or make them feel vulnerable, old, or stigmatised.
- Lack of capacity to make changes themselves or commission contractors.
- Fear that they might be asked to move or will lose a secure tenancy.

A clearer focus on making all homes easier to manage would help tenants throughout the life course. There is also a need to invest in more attractive adaptation designs to remove any stigma.

People need to know where to turn, be able to find appropriate information, and have a straightforward process to get help and support well before they get to crisis point. Landlords could do much more to seek out tenants who need help through housing reviews or home

MOTs as is discussed in later chapters.

Good communication is the key to effective adaptation services which means listening to tenants and their families and working with them to get outcomes that suit their needs. As disabled people encompass all age groups it is important that services are not just focussed on older tenants.

Complex customer pathways

The customer pathway to either get their property adapted or move to a more suitable home should be relatively simple. The current pathway has become very complex due to the legal and funding challenges outlined in the previous chapter. Research into the housing experiences of disabled people by the Equality and Human Rights Commission in 2018 reported that:

“ **Housing associations tend to offer support with the process of applying for an adaptation, which meant that residents of social housing reported finding it easier to have adaptations installed than private tenants or homeowners.... Despite comparable ease, the process of acquiring adaptations for social housing was described as lengthy, and participants often struggled to get the**

73 Centre for Ageing Better (2021) Getting our homes in order, London: Centre for Ageing Better.

74 Bailey C, Aitken D, Wilson G, Hodgson P, Douglas B, Docking R. “What? That’s for Old People, that.” Home Adaptations, Ageing and Stigmatisation: A Qualitative Inquiry. International Journal of Environmental Research and Public Health. 2019; 16(24):4989. <https://doi.org/10.3390/ijerph16244989>.

75 The Good Home Inquiry (2021) The Good Home Dialogue, London: Centre for Ageing Better.

changes they needed.”⁷⁶

The following chapters look at the funding complexities and adaptations delivery process in more detail and suggest ways in which these could be improved.

76 <https://www.equalityhumanrights.com/sites/default/files/research-report-114-housing-and-disabled-people-experiences-in-britain.pdf> p. 10

SUMMARY: IMPORTANCE OF ASSOCIATIONS FOR DISABLED PEOPLE

- **Social housing provides homes for a much higher proportion of disabled people than other tenures.**
- **More than half of households (54%)** have someone with a long-term illness or disability, almost 7% of households contain a wheelchair user.
- **Almost a fifth of new lettings** are to households with specific disability-related housing needs.
- **Nationally social housing provides homes for 27% of all disabled people and 34% of wheelchair users** although the sector makes up only 17% of all homes.
- **Only 20% of housing association homes have all four of the main accessibility features.**
- **21% of households are in unsuitable homes** – households with at least one person with a long-standing health condition said their accommodation was unsuitable.
- **56% lack the adaptations** - the proportion of housing association tenants with a long standing condition that lacked adaptations they need has risen from 50% to 56% in the last five years.
- **About 20,000 housing association properties adapted annually using the DFG** (in England) a total investment of just over £200 million a year. The most common major adaptations are replacement of baths with showers, stairlifts and ramps.
- **People of all ages need home adaptations** - 46% of DFG approved for housing associations go to people 65+, 47% to people 18-65, and 7% to families with disabled children.
- **Proportion of housing association homes with adaptations has gone down from 21% to 18%** over the last decade despite high levels of investment; in contrast council stock adaptations have increased.
- **People in minority ethnic groups appear to have fewer adaptations** than white households and are twice as likely to have no adaptations at all.
- **People do not always come forward for help** as they are afraid to look ahead to a deterioration in their condition, are worried about annoying their landlords, do not want their home to look 'disabled' or fear they might be asked to move.
- **There are many evidenced benefits to adaptations** including, improvements in mental health, reduction in falls, reduced need for personal care, longer tenancy, delay in needing residential care, and considerable cost savings for health and care services. Delays in getting adaptations can lead to worse outcomes.
- **Although associations offer support, the adaptations process is lengthy**, and tenants

sometimes struggle to get the changes they need.

- **Like everybody else disabled people want to be able to live a full life** - they need fast, effective adaptation services.

4. HOUSING ASSOCIATIONS FUNDING HOME ADAPTATIONS

4. Housing Associations Funding Home Adaptations

Housing association funding

As Chapter 2 identified, when direct funding for housing association adaptations finally ended in 2008 it was expected that associations would *'build the funding of adaptations into their business plans as part of their core activities'*.⁷⁷

Some have done this for all adaptations, but others only fund minor adaptations. Housing associations now fall into two main groups:

- The biggest group includes traditional associations, LSVTs with no designated budget at the time of stock transfer, and LSVTs that have expanded outside their original area or been absorbed into much bigger organisations. These associations usually only do minor adaptations, with residents referred to the DFG for major adaptations.

⁷⁷ Heywood, F. and Mackintosh, S. (2008) Housing associations and home adaptations: Making it work Smoothly, London: Habinteg.

- A smaller group are LSVTs set up with substantial budgets at the time of transfer, equivalent to the level of funding previously provided for the council stock. These organisations control the whole process and make minimal use of the DFG. Some of the best practice identified in this study perhaps inevitably comes from these associations as they have fewer handovers to other organisations for any part of the process.

The split in adaptations funding and services

Traditional associations and some LSVTs

- Budget for minor adaptations (e.g. grab rails) but upper limit varies - most set at £1,000.
- Assessments - refer to local authority occupational therapy service, although a small number have trusted assessors able to do more straightforward work.
- Use DFG for nearly all major work (showers, stairlifts, ramps, extensions etc).
- Some contribute to DFG costs, but amount

varies - percentage, fixed amount, types of work.

- Also spend on adaptations through major improvement work.

38% of associations in the survey did no major adaptations themselves - referred all tenants to the DFG.

42% mostly used the DFG but did some major adaptations themselves e.g. as part of improvement work, refurbishing a void property suitable for an older person, where a tenant was ineligible for DFG funding, or in other special circumstance such as for palliative care.

LSVTs still based in original area or merged with other LSVTs

- Substantial budget, use own contractors, control whole adaptation process themselves
- Assessments - a few have their own occupational therapists (OTs), trusted assessors or use private OTs.
- Usually an SLA with the local authority to cover DFG top-up for expensive cases or when their own budget runs out.
- May refer very complex cases to the local authority.
- Outside the area of their original agreement – unless there is a new SLA usually use the DFG.
- Also spend on adaptations through major improvement work.

21% of associations in survey

Spend on home adaptations

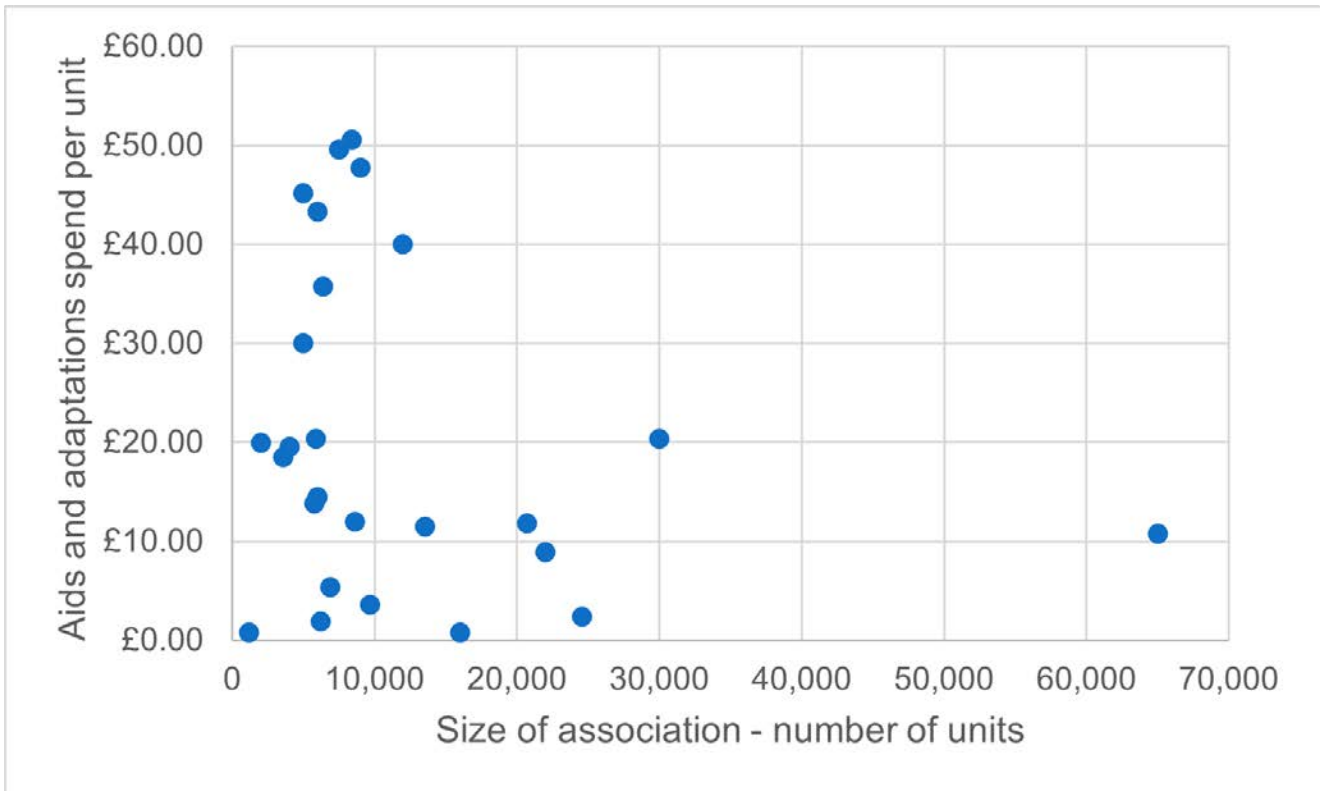
It is difficult to determine exactly what housing associations spend on adaptations. There is usually a budget for minor adaptations, but only a minority fund major adaptations. There may be considerable spending as part of cyclical and major improvement work, but this is hard to identify and fluctuates from year to year.

From the limited amount of information collected from surveys and interviews, spending varies considerably. Data from a small sample of 26 associations shows that spending in 2019/20 ranged from less than £1.00 per unit of stock to over £50.00 per unit (Figure 4.1). The majority spend £20.00 or less per unit.

As might be expected, the biggest spenders on adaptations were LSVTs still mainly restricted to the area in which they were first established. Some have expanded or merged with organisations outside of the original LSVT area and have a more hybrid form of funding (for an example see box). Traditional associations were generally not as well-resourced and some of the bigger associations had small budgets relative to the size of their stock.

Source: online survey of housing associations conducted for this project

Figure 4.1 Variation in adaptations spending per unit of stock by size of organisation



“ Across the housing stock we will carry out minor adaptations up to £1000. Under the stock transfer agreement, we work closely with the LA and will carry out major adaptations until that set amount of money has been exhausted then request will go via the DFG route.”
Survey participant from a transfer association.

“ We ask for the DFG to be used wherever possible to preserve our budget for when the customer is not eligible for a DFG, or for fast tracking urgent cases where there is a long wait with the local authority. I discuss each case with the local authority and make a decision on funding.”
Survey participant from a traditional association with stock across numerous LA areas.

Eastlight Community Homes [check OK to be named and get approval of wording]

Eastlight is a Community Gateway organisation formed from the merger of two associations in 2020 with 12,500 homes mainly in Essex and Suffolk.

The budget for home adaptations in 2020/21 was £550,000. It includes substantial funding for the transfer stock in Braintree where there is an agreement for Eastlight to carry out all adaptations, including level access showers, stairlifts and kitchen modifications. If necessary, the local authority will contribute additional funding to more expensive cases, such as ground floor extensions.

Outside the area covered by the Braintree

agreement, Eastlight organises minor adaptations up to a threshold of £1,000. If the budget allows there is discretion to do work over this amount, with priority given to those who are most vulnerable. Other cases are passed to one of eight different local authorities for a DFG, with Eastlight making a 40% contribution to DFG costs if the budget allows.

The adaptations service is run by the Tenancy Sustainment team which provides a wide range of support, including applications for rehousing should that be necessary. Eastlight has its own OT department and in-house contractors carry out the work.

Minor adaptations budgets

Housing associations have been responsible for funding and carrying out their own minor adaptations since 1996 when the Housing Corporation removed direct funding for minor works under £500 expecting it to be done by associations themselves.

There is also some work carried out by health and social care services mainly to support hospital discharge or to meet care needs, but budgets have been under pressure for the last decade. They can provide such things as grab rails, extra stair rails or small ramps, but are most likely to provide equipment, such as toilet frames, bath boards, walking frames, stand aids, and moveable hoists. Much of this is temporary and only needed while people regain

their strength and balance.

Minor adaptations are extremely important.

The most common adaptations needed both inside and outside the home are rails, particularly in the kitchen and bathroom or up the stairs (Table 4.1). Bath and shower seats, showers, changes to the toilet, and ramps are also needed.

Table 4.1 Most common adaptations needed in housing association properties 2019-20

Type of adaptation needed	
Inside the home	
Grab rails – kitchen or bathroom	46%
Other grab, hand or stair rails	39%
Bath and shower seats or other bathing aids	27%
Special toilet seat / raised toilet or other aids to use the toilet	23%
Graduated or level access floor shower	19%
Shower replacing a bath	18%
Stairlift	12%
Outside the home	
External handrails	28%
External ramps	22%
Rails to external steps	13%

Source: English Housing Survey: Home adaptations report 2019-20 Annex Table 2.4 (multiple responses allowed)

A rail by the bath, shower or toilet is a simple and cheap adaptation to help someone carry on doing essential daily activities safely while maintaining their dignity and independence. Similarly, a grab rail, half step, handrail or small ramp by an outside door can be essential to allow someone live a normal life because they

can get in and out of their home or into their garden.

Upper thresholds for minor adaptations

Housing association minor adaptations spending is limited by designated upper thresholds which restricts the amount of work that can be completed. Thresholds vary from £500 to £2,500, with the majority setting their limit at £1,000 per case. The £500 limit dates back to the removal of funding in 1996, which is now a quarter of a century ago. Just allowing for inflation the threshold would now be £1,000. Although most associations have increased their upper limit to £1,000 there are still a considerable number with a £500 limit.

Thresholds do not seem to have risen beyond £1,000 despite considerable increases in building and material costs in recent years. In 2021 costs rose still further due to restrictions in the supply of materials and shortages of labour.

Interviews for this project showed that, in most cases, overall spending on minor adaptations bears little relationship to any assessment of actual need or calculation of costs but is simply based on last year's figures.

Minor works thresholds vary from £500 to £2,500, with the majority setting their limit at £1,000.

Most people interviewed said that budgets were simply based on last year's figures rather than any analysis of need.

Coping with restricted budgets

Staff from associations with a £500 limit on minor works expenditure said it was increasingly difficult to carry out work for this amount, and even those with £1,000 limits said it was too restrictive. For example, a ramp will also need a new door threshold which comes in over £1,000.

“ It would be great if the £1,000 threshold could be raised to a higher amount so that I could undertake more works. Unfortunately, the costs to undertake works has gone up which means I'm not able to do works under the minor like I used to.”

Survey respondent.

Some associations were more flexible with their budgets. A small association with a £1,000 threshold felt it was sufficient as most work was mainly grabrails, handrails or alteration of steps. The occasional job that cost more, such as a long, galvanised rail costing nearer £2,000, they would split it into two jobs to bring it in under the limit.

However, several respondents said that it would be better if the upper threshold was at least £1,500 as they could do a lot more with this to keep people independent.

Flagship Homes - Being flexible with budgets

Flagship Group builds homes, lets, improves and maintains them. It doesn't simply want to make a difference to its tenants and their communities – Flagship wants to solve the housing crisis in the East of England too. Flagship owns 32,000 homes across the East. The Group is made up of three housing associations - Victory Homes, Newtide Homes and Samphire Homes - and an in-house repairs and maintenance company, Flagship Services, which provides home adaptations across the whole Group. Since the Group launched its new federated structure in April 2020, the adaptations service has been reviewed. There is no longer a specified upper limit for minor adaptations and the Groups' dedicated Adaptations Co-ordinator keeps tenants safe in their home, where they are able to maintain their independence for as long as possible.

Flagship mainly provides grab rails, altered lighting, and improved safety, but it also does other work that would not necessarily be covered. The adaptations provided keep people independent. Since the new structure, Flagship completed almost 15,000 adaptations in 2021.

For major works Flagship uses the DFG, which mainly provides level access showers, ramps, stairlifts, and wash and dry toilets. Over nine months in 2021, there were

260 DFGs. Flagship works with 20 local authorities and four county councils, all with slightly different process. It's minor works budget helps to keep people safe while they are waiting for a DFG.

In two local authorities the DFG team does the assessment, makes the recommendations, and specifies the adaptations, but Flagship Services manages the work. It is very effective as Flagship can pick up any additional jobs, for example the team often replaces the toilet and wash basin at the same time as putting in a level access shower. It also makes sure that all the relevant information is entered on the asset management database.

Flagship uses several reliable contractors, although there is always a high level of demand on their time. The Group has agreements with contractors and repairs teams for equipment and fittings that are no longer needed – it is removed, refurbished and stored, allowing Flagship time to install straight stairlifts, different height toilets, and wash and dry toilets very quickly using the minor adaptations budget.

The adaptation staff also work closely with the capital works programme to make homes more inclusive. This includes putting low level trays in the bath footprint to make it easy to convert homes; using attractive, easy to clean wall boards instead of white tiles; and leaving a space in the kitchen for an eye level cooker.

“ I wish I could do everything without jumping through hoops. I have a landlord head and a disabled adaptations head... we normally get there, but it is a frustrating world.”

The impact of restricted budgets on tenants

Where budgets are too restricted or not used flexibly, more cases end up being passed to local authority occupational therapists, DFG teams or home improvement agencies. These adaptations take longer as tenants often join lengthy waiting lists. This has an adverse effect on people from other tenures who also end up waiting longer, with impacts on everyone's health and safety.

When the housing association passes across responsibility it means that other repair and improvement work may not be spotted and done at the same time. It is also not part of a preventative strategy. For example, one adaptations officer interviewed said that if there was a request for outside lighting or a path relaying to make access safer, she asked for a local authority OT assessment to prevent neighbours asking for the same improvements. Although it would make the outside environment safer for everyone, the adaptations budget was too small to cover the costs.

Impact of poor adaptation design on tenants

The cheap rails installed by health and social care as temporary measures have become universal without much thought going into their appropriateness.

Restricted budgets mean that it is hard to innovate and improve the appearance of adaptations. The previous chapter showed that people are often deterred from installing needed adaptations because they are unattractive and single them out as being old or vulnerable.

Poor design can also have a serious detrimental impact. A report on doorstep crime showed that 43% of victims had a handrail, grab rail, a ramp to their door, or a key safe for use by carers. This suggests that criminals use these items to identify vulnerable tenants.⁷⁸

Improving minor adaptation design

There are now attractive designs for minor adaptations available from a wide range of manufacturers and suppliers that look good in any home. They last longer, they are not stigmatising and do not draw attention to a household's vulnerability (see box).

⁷⁸ Andrews, R. (2015) Doorstep Crime Project Report 2014/15, National Tasking Group, National Trading Standards.

Improving the design of adaptations – Invisible Creations⁷⁹

In 2018, the National Housing Federation (NHF) ran an incubation programme, 'Creating our Future', to encourage collaboration and innovation in the social housing sector. The biggest success story from the programme came from Invisible Creations®. The team developed well-designed, inclusive, dual-purpose adaptations to prolong independence, promote mobility and prevent falls.

They have created products that are designed to remove the negative stigma so often associated with current assistive and accessible products and overcome people's reluctance to adapt their homes. Instead of the unattractive plastic rails that are normally installed, their unobtrusive rails are disguised as a plant pot holder to go outside the front door, a toilet roll holder, a mirror, and a shower shelf. They believe homes should be a haven, not a hospital and products designed to help you remain independent should be attractive, not clinical.

A wide range of housing associations across the UK are installing the range in their housing stock and already seeing the benefits of this inclusive and preventative approach to adapting their homes.

Tricia Grierson, Manchester Housing Providers Partnership:

“ For years we have witnessed the reluctance of our older residents to use assistive products in their homes; choosing to struggle on or even fall rather than have them installed. We are all delighted to have Invisible Creations® products available to us that are as dignified as our customers. To finally see them in place is really significant. They fit seamlessly into our bathrooms, quietly doing a really important job, which is helping our residents to remain independent in their homes for longer.”

The company is increasing the options available and working on the next generation of products. They have been working in collaboration with the Royal College of Art's Helen Hamlyn Centre for Design on a research project to support future designs, and teamed up with a mainstream bathroom company, PROCare, to create a flexible bathroom which incorporates Invisible Creations® products. The bath can easily be removed to change it to a shower room as the occupant's needs change.

Find out more about Invisible Creations® at www.invisiblecreations.co.uk.

Measuring the impact of minor adaptations

Asset management is focussed on value for money. Although better design means the price of components would increase,

79 Invisible Creations <https://www.invisiblecreations.co.uk>

it would have a limited impact on overall expenditure as most of the cost is in paying contractors or handypersons to fit adaptations. Housing associations have much greater purchasing power than local authority DFG teams which would allow volume discounts to be negotiated. Installing well designed components makes the housing stock inclusive for all tenants.

It is also cost effective. In any value for money calculation, it is important to take account of the full cost and savings and include materials and labour costs; repair and replacement costs, and time taken to remove fixtures and fittings at change of tenancy rather than leaving in place for the new tenant. It also needs to factor in the impact on tenants' independence and wellbeing and their exposure to crime.

It is also important to recognise that every adaptation is an advertisement. If it is unattractive, more people will wait until they get to crisis point before coming forward to get the help they need, adding to costs for health and care, leading to poorer outcomes for tenants and potentially much higher adaptation costs or a need to move home.

Some associations are measuring the impact and outcomes of their adaptation work (see WDH case study at the end of Chapter 7) but this is not the norm. Raising budgets and taking more control over the adaptation process would allow better measurement of outcomes and feed back into continuous service improvement.

SUMMARY: HOUSING ASSOCIATION HOME ADAPTATIONS FUNDING

- **Housing associations fall into two groups:** a) the biggest group only do minor adaptations, with tenants referred to the DFG for major adaptations, although a few do major adaptations as part of improvement work, when refurbishing a void property or in special circumstance e.g. to allow home care at end of life; and b) a smaller group (mainly LSVTs) set up with substantial budgets to allow them to control the whole process.
- **Some of the best practice comes from LSVTs with substantial budgets** - they have fewer handovers to other organisations and more joined up services.
- **Minor adaptations are extremely important** - the most common ones needed are rails in the kitchen, bathroom and up the stairs, or outside the home.
- **Spending on adaptations varies**, even amongst associations of the same size, ranging from less than £1.00 per unit of stock to over £50.00 per unit, with the majority spending £20.00 or less per unit.
- **Minor works thresholds vary** from £500 to £2,500, with the majority setting their limit at £1,000. Several people interviewed said they could do a lot more to keep people independent if the threshold was £1,500. Costs have risen considerably since the beginning of the pandemic. Some associations have removed the upper limit to focus more on prevention and a rapid response.
- **More substantial budgets are needed** - to prevent handovers, speed the process, help improve design, take away stigma, and reduce risk of crime for vulnerable households.

Recommendations - Funding

HOUSING ASSOCIATIONS

- **Review adaptation budgets and set the minor adaptations threshold at a minimum of £1,000 per case (preferably higher to follow best practice) to prevent handovers to local authorities, long waiting times for tenants, cover the rising cost of work, and develop better designs.**

5. DISABLED FACILITIES GRANT (DFG)

5. Disabled Facilities Grant (DFG)

Apart from LSVTs with their own substantial budgets, most housing associations use the DFG for major adaptations. Where housing associations are based in a limited local area and only deal with a few local authorities the arrangements are relatively straightforward and there are often close working relationships with their partner authorities. However, there is a bewildering picture for associations that work across local authority boundaries because of different DFG funding arrangements in each local authority area..

Complexity of DFG funding arrangements

In some cases, associations make no contribution to DFG costs, but in others there are different percentage contributions or varying thresholds, and a range of different agreements about how and when contributions should be paid.

Most national and regional adaptations officers mentioned the complex spreadsheets they maintained to understand the DFG arrangements and who to contact if there were problems.

“ I work with over 100 local authorities - the bulk don't request a contribution. There's a group of authorities where we make contributions of between 40-70%. There's also a few authorities we pay in full up to a level and the rest of the cost (if there is any) is picked up by DFG.”

Survey respondent.

“ We work with 7 [authorities]. In respect of 5 of them there is a 40% contribution from us towards DFG funded works between £1000 and £10,000 - DFG fully funded above this. In respect of 2 of them - no contribution from us towards DFG funded works.”

Survey respondent.

Housing association staff have difficulty in understanding the reasons for these variations. They also find it hard to explain to tenants why some authorities have sufficient resources and fast services, while others have waiting lists. Staff felt they were unable to provide a fair and equitable service for their residents.

“ I spend most of my time battling with local authorities.”

Interview respondent in the regional office of a big national association.

From the local authority perspective, staff find it hard to understand why an individual housing association can pay either nothing or only a small amount in their area, while contributing substantially more to the DFG in a neighbouring authority.

It is useful to look briefly at the evolution of the DFG to understand why there is so much variation in housing association contributions between authorities, and why local authorities have different approaches to DFG delivery.

The legacy of DFG funding prior to 2015

Authorities used to bid for resources from central government and until 2008 had to provide 40% in matched funding. The result was an uneven spread of resources with some areas more able to cope with demand than others.

After the Housing Corporation finally withdrew

direct funding for housing associations during the early 2000s there was a rise in DFG applications which led to long waiting lists in some areas. This was when local authorities first started to ask for payments from associations.

Unfortunately, there was no consistency in the amount requested. Some wanted a percentage of the total cost of each case, some a payment above or below a certain threshold, while others only wanted contributions where a tenant had to pay a share of the costs, or for expensive cases over the upper limit of the DFG.

Some regional and national associations concerned about long waiting lists, and keen to avoid paying different amounts in each area, volunteered to pay a standard amount. However, each association set its own level from 20-50%.

In 2011 a new central government DFG allocation process was developed, based partly on funding levels established through the old bidding process, but with all new funding allocated through a formula based on the potential need in each area. Although authorities were no longer required to match fund the DFG, most continued to do so as central government allocations were still too low to meet overall demand.

Long term planning for DFG expenditure was difficult as authorities never knew what their funding allocation would be from year to year,

especially after the financial crisis and overall cuts to local government expenditure. The cuts included the loss of a separate allocation to allow authorities to provide grants for home repairs which was often used alongside the DFG to bring homes up to decent standard.

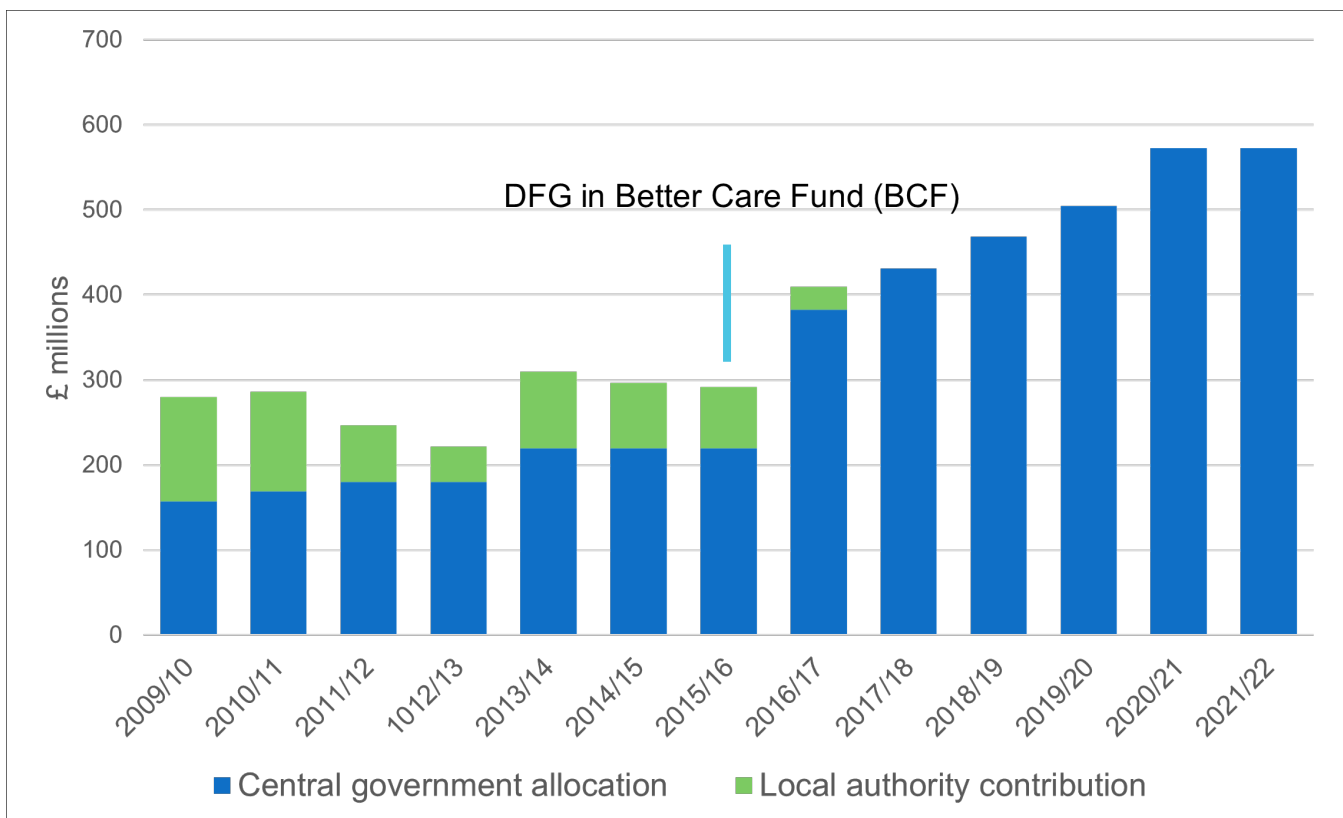
The Better Care Fund and increases in DFG resources after 2015

The level of central government contributions to the DFG changed significantly in 2015 when the grant became part of the Better Care Fund (BCF) a joint Health and Social Care budget set up to integrate health and social care services, speed hospital discharge, reduce numbers going into residential care, and help people stay independent at home. A five year plan for DFG capital funding guaranteed an increase every year up to 2019/20.

The increase in funding finally brought some stability, reduced the need for local authorities to contribute their own funds, and allowed authorities to better address local needs and begin to improve services.

Funding continued to rise with investment reaching £573 million per year in 2020/21 and 2021/22. This was double the total funding in 2015/16 (Figure 5.1). Allocations have now plateaued and will continue at £570 million per year until 2024/25. The money is distributed from the Better Care Fund direct to each housing authority. A few authorities continue to add their own funding.

Figure 5.1 Changes in DFG funding 2009/10 to 2021/22



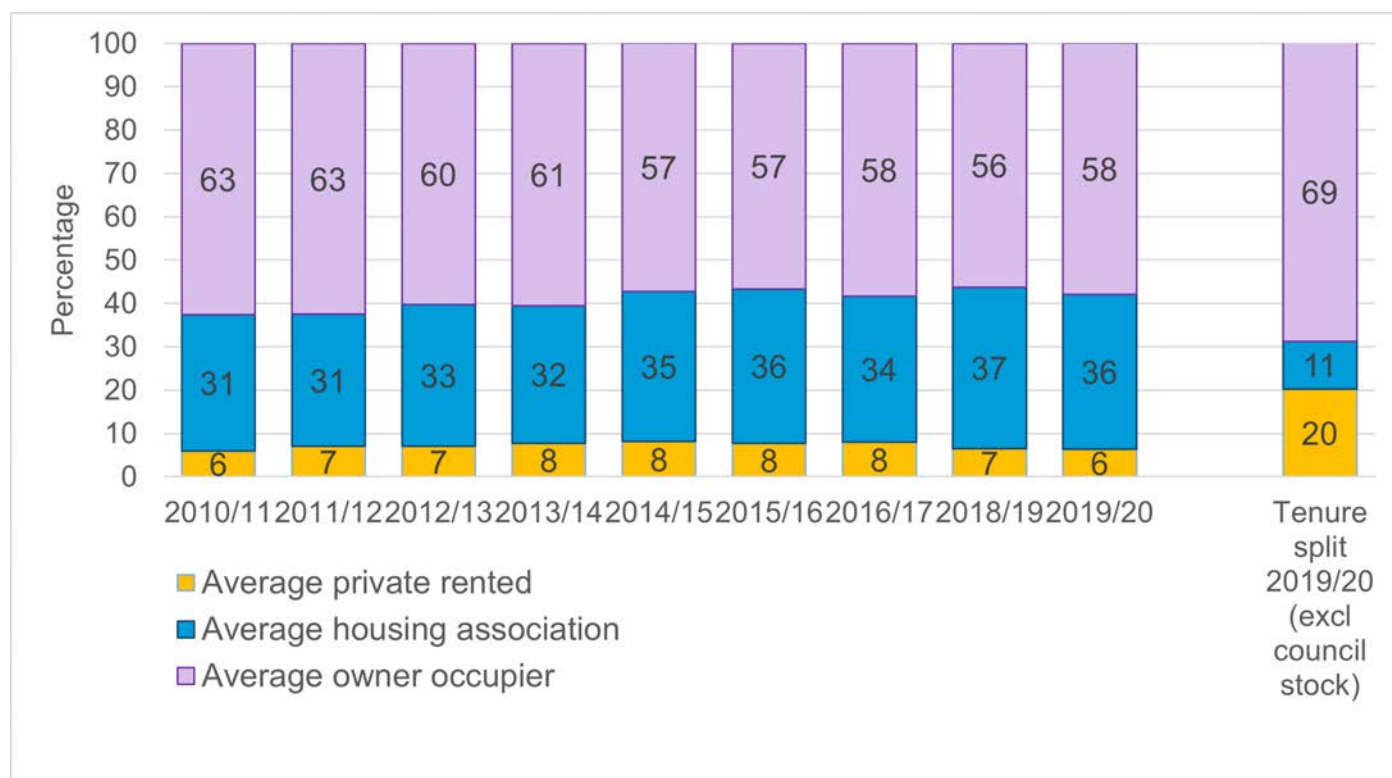
Source: Foundations

However, the spread of DFG allocations across England is still uneven as the funding formula has not been updated since 2011 and the legacy of the old bidding systems still exists. As a result, some areas receive less than would be expected according to indicators of need.⁸⁰ The formula also does not take account of demand from housing associations which varies from area to area.

Uneven use of DFG by housing associations

Housing associations own an average of 11% of the private sector housing stock in England but on average 36% of DFGs went to their tenants in 2019/20 (the figures exclude the council stock and ALMOS which are public sector organisations). Association share of DFG has increased slightly over the past decade (Figure 5.2). They use just over £200 million of the £573 million DFG allocation. As they house such a high proportion of disabled people, it is perhaps inevitable that they use what seems to be a disproportionate amount of the DFG. However, in some areas it means that low income owner occupiers and private tenants do not get a fair share of resources.

Figure 5.2 Trend in use of DFG by tenure 2019/20



Source: Foundations (annual DELTA data return - DFG). Note: Adaptations for council tenants and ALMOs excluded - not funded by the DFG but from each council's housing revenue account.

80 Mackintosh, S. et al. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England, pp. 150-52.

The figures used in Figure 5.2 are national averages for England. The map in Figure 5.3 breaks this down by authority and shows the percentage of grants going to housing associations compared to the level of housing association stock in each area.

from traditional housing associations. Other places in the highest categories include some London Boroughs and authorities in the South and South East, including Camden, Kensington and Chelsea, Basingstoke and Deane, Windsor and Maidenhead, Hillingdon, and Mole Valley.

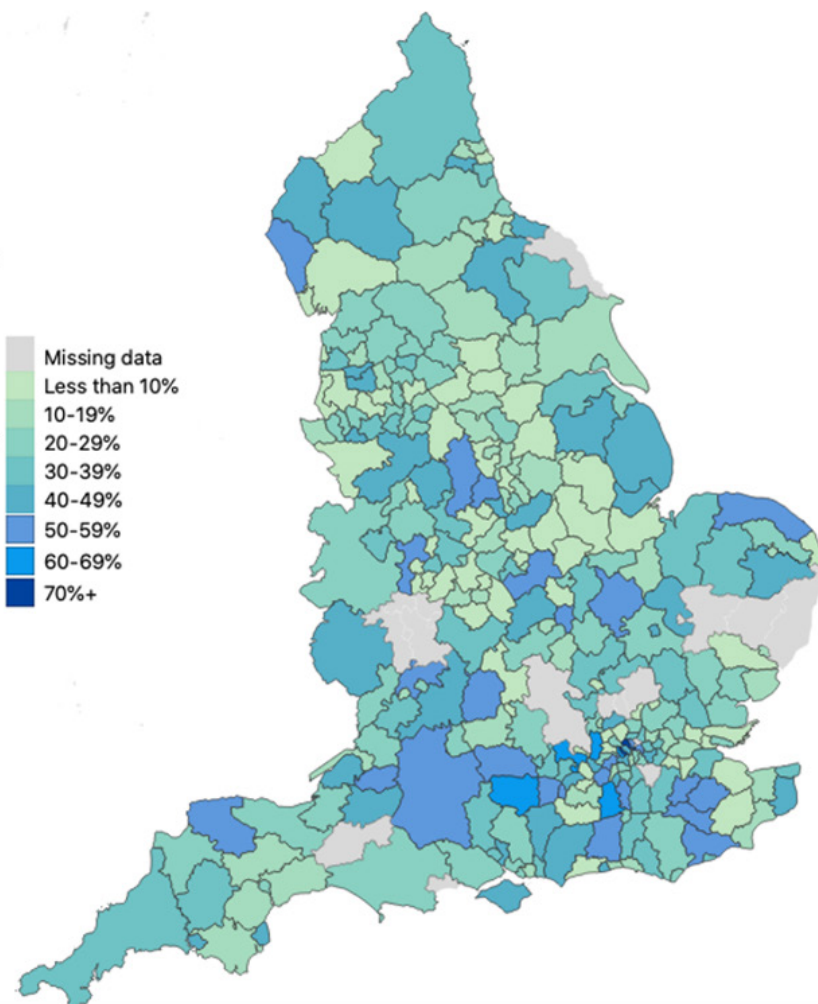
The darker colours show areas where housing associations use very much higher levels of the DFG than might be expected. These are mainly places where stock was transferred without a budget and where major adaptations for all tenures are delivered through the DF (for example North Devon, and Copeland in Cumbria) or where there is very high demand

Figure 5.3 The provision of DFGs to housing association tenants 2019/20 relative to housing association stock levels in each local authority area

Provision of DFGs to housing association tenants relative to stock levels

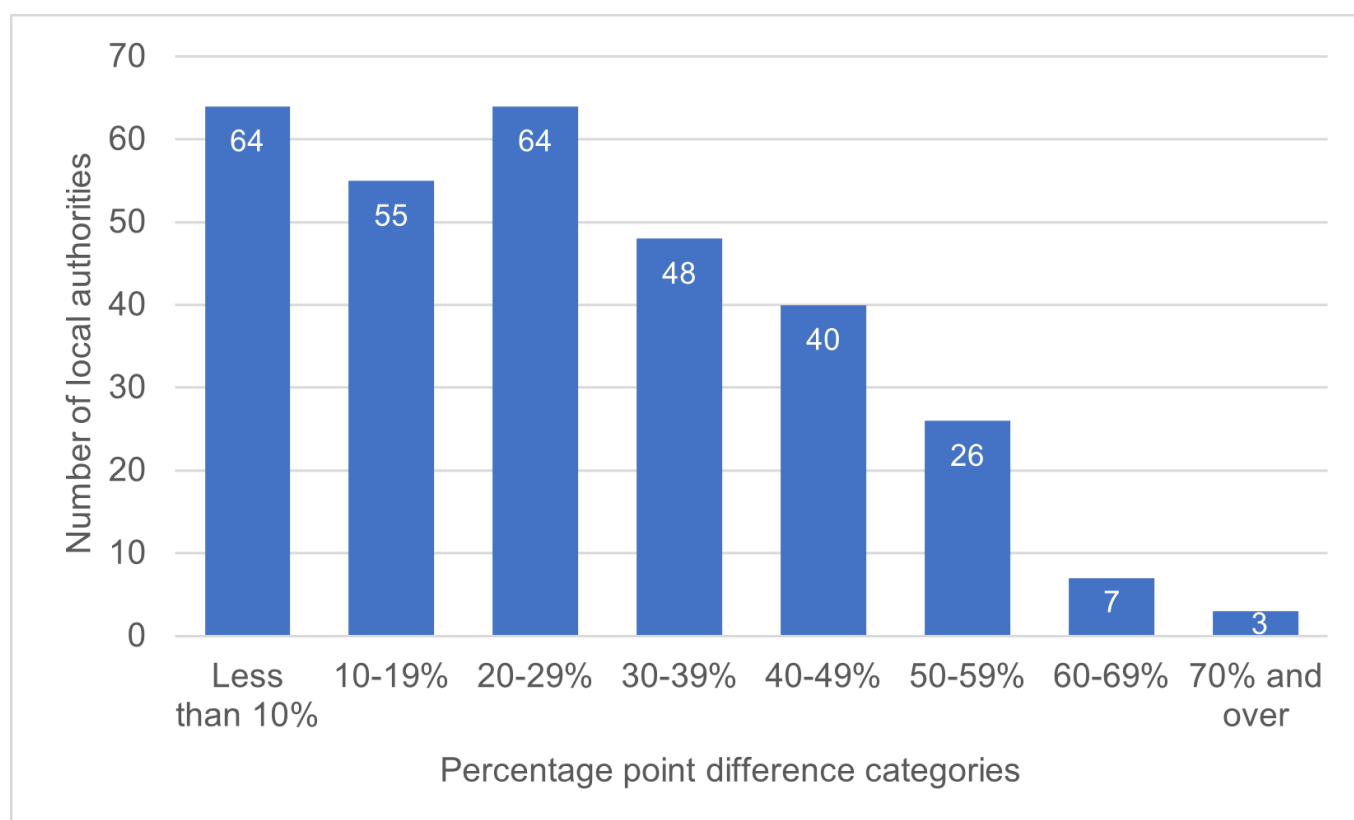
The difference in percentage points between the proportion of DFGs going to housing association tenants and the proportion of housing association owned dwellings in each local authority area.

The bigger the percentage point difference the more grants are going to housing associations than might be expected given their stock in the area.



Source: Foundations – from MHCLG annual DELTA data return relating to the DFG 2019/20
 MHCLG Live tables on dwelling stock - Table 100: number of dwellings by tenure and district, England <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>.

Figure 5.4 Variation in use of DFG by housing associations 2019/20



Source: a) Foundations (2019/20 DELTA data return – DFG),
 b) DLUHC Live tables on dwelling stock - Table 100: number of dwellings by tenure and district, England.

Figure 5.4 summarises the information shown on the map. Each bar shows how much higher the percentage point difference is from what might be expected if housing associations got the number of DFGs that their stock levels would indicate. In 64 authorities (21% of those providing data) it was a close match, but in 36 authorities (12%) it was over 50%, far more than might be expected, with the remainder falling in between.

If there is no agreement about funding contributions, authorities where associations use a high proportion of the DFG budget often struggle to deal with demand. One small borough council in the survey expressed concern about the potentially negative impact on low income home owners and private rented tenants who also need to use the DFG.

“ We are seriously concerned about the proportion of spend in housing association properties and the potential inequality of access. There is no agreement to share costs and is fully funded by the BCF allocation.”
Local authority respondent to online survey

Changes in the way local authorities deliver the DFG

Since the rise in DFG allocations after 2015 some local authorities now have ample capital funding and can easily meet demand for the mandatory DFG. Using powers in the 2002 Regulatory Reform Order this has allowed them to develop Housing Assistance

Policies to provide additional more flexible, discretionary grants, often related to the aims of the Better Care Fund and local needs. Most authorities in England now have a policy, but what is provided varies.

A number of authorities have also stopped means testing DFG applicants, partly because the test is out of date, but also to reduce the amount of paperwork and speed up delivery. This may have had less impact on social housing tenants than other tenures as people on certain benefits are passported through the means test. Even so, the 2018 DFG Review indicated that 23% of social housing tenants drop out of the DFG process, with the need to contribute to costs one of the main reasons.⁸¹ The people most affected are more likely to be younger tenants who are working.

Unfortunately, authorities with limited DFG allocations or high use of the DFG by housing associations still struggle to meet their mandatory duties. They are only able to remove the means test or offer additional services if they have significant contributions from housing associations.

Housing association contributions to the DFG

Data was collected by Foundations in early 2021 from 167 authorities (almost 50% of local authority DFG services) about housing association funding arrangements. The results are illustrated in Figure 5.5 and show that:

- **Contribution levels** - most local authorities in the sample appear to get no contribution from housing associations towards the costs of providing DFGs for their tenants, despite many running a full agency service to draw up specifications, find contractors and support tenants through the process of getting building work completed.

- **Funding agreements and contributions** - half of authorities in the sample said they had an agreement about funding with at least some of the associations in their area but most were informal and not all were receiving any contributions.

- **Range of contributions** - those in the sample which received contributions got different amounts from each association ranging from 10%-60% of approved costs.

- **Total cost of all approved DFGs from all tenures** -overall, housing association contributions appeared to amount to less than 10% of all DFG costs. Only five authorities in the sample said they relied on association contributions for more than 20% of total approved costs from all tenures and those contributions were extremely important.

- **Approved DFG costs for housing association tenants only** - looking at housing association cases on their own (excluding other tenures), most authorities in the sample said that in total associations contribute less than 10% of approved costs, however,

⁸¹ Mackintosh, S. et al. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England, pp. 150-52, p. 38.

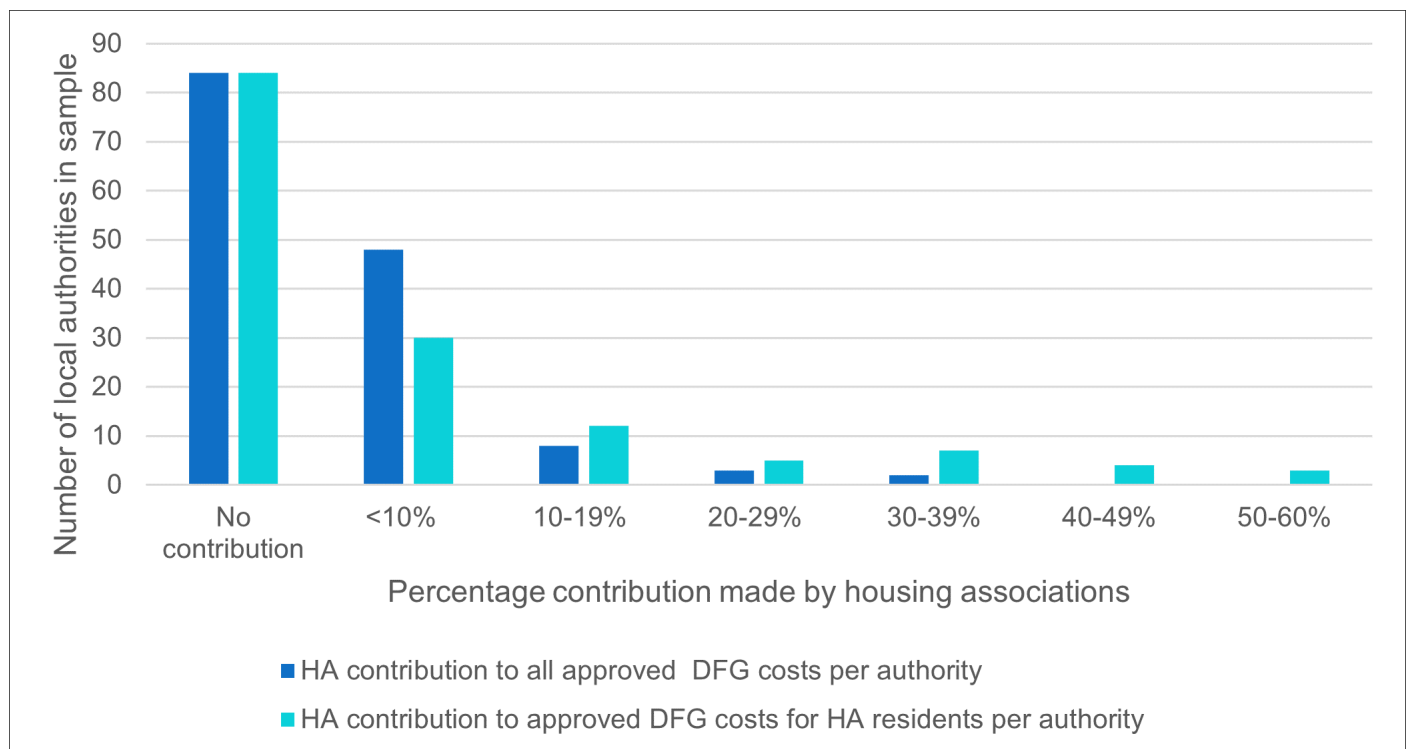
in some authorities, associations make substantial contributions of up to 50-60% of costs.

to understand the arrangements with each association.

It must be noted that the data from the survey may considerably underestimate the importance of funding provided by housing associations as only a third of respondents were able to provide data on the contributions received in 2019/20.

Within individual authorities, levels of contribution can vary considerably (see box). Like their housing association counterparts, local authority and home improvement agency staff often maintain complex spreadsheets

Figure 5.5 Percentage contribution made by housing associations to approved DFG costs 2019/20



Source: Foundations. Note - only a third of respondents provided data on the contributions they received in 2019/20.

The complexity of contributions in a single authority

This is illustrated by an example provided by one small unitary authority where:

- HA 1 does own minor adaptations up to £500 and pays 50% towards majors.
- HA 2 does own minor adaptations up to £1,000 and pays 50% towards majors.
- HA 3 does own minor adaptations up to £1,000, contributes up to £2,000 towards major works or funds major works up to this cost in some cases.
- HA 4 does own adaptations up to £2,500 with those over funded by the DFG.
- HA 5 does minor adaptations under £1000 with those over funded by the DFG.

The role of partnerships

Some authorities have developed strong home adaptation partnerships and a standard approach to DFG contributions. The 2018 DFG Review recommended that Housing and Health partnership arrangements were developed in all areas to ensure effective local planning of housing services.

The following examples show why partnerships are important. However, as with so much in the home adaptations field, there is little consistency in the way these partnerships are organised.

St Helens has negotiated substantial contributions with the main housing

associations in their area, enabling them to remove the means test and deliver a comprehensive agency service across all tenures (see box).

Partnership working with housing associations - St Helens

In total St Helens is a local authority in the North West of England. Nearly a quarter of the population live in neighbourhoods that fall within the 10% most deprived nationally. It is the eighth most deprived authority in terms of health and disability so there is a high level of need for home adaptations across all tenures.⁸²

In 2019/20 47% of DFG completions were for housing associations, with most done for the association that took over the council's housing stock.

They have service level agreements with the four main associations in the area. An estimation is made at the start of the year of the likely caseload and a 50% contribution is paid in advance. Any other associations using the DFG service are also asked for a 50% contribution. There are very few cases where costs are not shared.

The contributions enable them to remove the means test for tenants and offer a full agency service which includes liaising with the resident, surveying the property, helping to fill out paperwork, doing the design and

costings, and supervising the work. In addition, they provide a recycling service for lifts and ramps as part of their framework agreement.

Without housing association contributions, the authority would not be able to provide such a comprehensive and fast service. It also ensures that the local authority can fulfil its statutory duty to applicants from other tenures. There would be a major impact on service delivery if any housing association contributions were lost.

Walsall also has a close working relationship with their partner housing associations (see box). Like St Helens, a high proportion of DFG applications come from housing associations, but unlike St Helens, Walsall does not currently offer a full agency service. They expect housing associations to support their own tenants and manage the work themselves.

Minor adaptations up to £1,500 are funded by partner associations, with matched discretionary DFG funding for jobs up to £3,000. To simplify and speed up the process they have removed the means test, cut out paperwork, and get blanket approval for key works. They encourage preventative work as part of planned maintenance and secure DFG investment by ensuring adaptations are not removed. They have also obtained substantial amounts of funding for other housing improvement work and energy efficiency schemes.

Partnership working with housing associations - Walsall

In total 55% of DFG applications in Walsall come from housing associations.

The council has developed a range of collaborative policies over the last 8-10 years, mostly supported by written agreements:

- **Minor works up to £1,500** – housing associations pay for and complete all adaptations up to the £1,500 threshold.
- **Joint funding for works up to £3,000** – associations fund the first £1,500 and Walsall funds the next £1,500 using discretionary funding. There is no need for a DFG application making straightforward jobs quicker and more streamlined. The association does the work, lets the local authority have basic details which are approved via email and paid on a bulk invoice.
- **Schemes over £3,000** – go through the DFG without any housing association contribution.
- **Blanket approval for certain DFG works** so that the authority does not have to keep asking for landlord's consent which causes delays.
- **Communal areas** – a range of schemes jointly funded e.g. motorised entrance doors. The associations fund the maintenance.
- **Adding accessible homes in new build schemes** – in new developments the authority has secured accessible homes and homes that can more easily be adapted in the future. They sometimes contribute to any

extra costs of development.

- **Planned repairs / maintenance** – the authority has secured agreement that, wherever possible, housing associations will put in level access shower rooms in with the authority contributing to any extra costs. This saves money in the long run as it avoids later DFG applications with the associated costs of administration. There is a considerable programme in place especially with one association. This saves all residents from needing to go through the (often complex and more time consuming) DFG route. It saves council staff time too.

- **Access to a shared specification and tender for lifting equipment** – this was commissioned by the council and allows associations to go direct to installers where they have stock outside the borough. Stock in the borough is dealt with under DFG and minor works routes.

- **Re-use of adapted stock** – associations proactively manage their stock to ensure properties that are adapted are not ‘un-adapted’ in the future.

- **Shared responsibility for referral** – where an adaptation comes direct to the local authority DFG team they advise the association if they notice urgent repairs.

- **Tackling wider issues** – a range of collaborative works where adaptations have been the link to obtain greater help for tenants – for example major home energy schemes, securing first time central heating, or external wall insulation. Over the years this policy has been operating the funds secured (mainly from external sources) have

outstripped the DFG spend.

Cornwall – is using an alternative partnership strategy to support a major, local housing association to carry out their own adaptations using a programme of works. A pilot with Coastline began in 2021 to trial this approach (see box).

Pilot for new Partnerships: Cornwall council and Coastline working together to improve the adaptations process for their residents:

During the Covid-19 pandemic, restrictions on home visiting meant delays for tenants across Cornwall in being able to access Occupational Therapy assessments and Cornwall Home Solutions (CHS) support. This led to delays in the progress of home adaptations that can promote their independence and enable them to live a full life.

Coastline Housing had 70 tenants waiting for support with assessment and adaptations, therefore they teamed up with Cornwall Council to pilot a new project. This aims to streamline the process of assessment and adaptation, giving direct ownership to Coastline to undertake the adaptations for their tenants.

Two locum Occupational Therapists are being employed by Adult Social Care and funded from the DFG capital programme. They will assess the 70 tenants either by

telephone (Where a virtual assessment is timelier and more appropriate) or face to face (if needs are more complex). The tenant will receive a 'statement of need' which is copied to CHS, and the design brief is forwarded to Coastline. Coastline will undertake the adaptation work and will be paid from DFG resources once the work has been completed and invoiced.

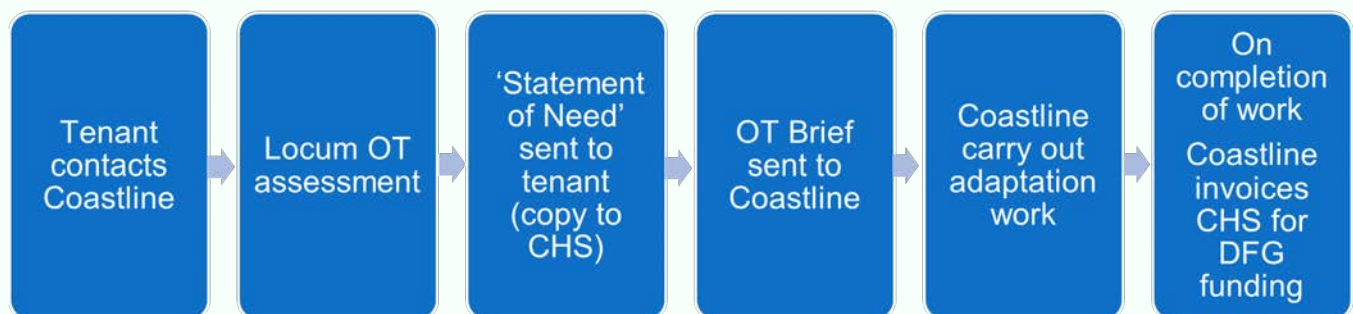
Benefits

- Coastline tenants will receive an assessment without delay
- Tenants do not make a DFG application as cases will be dealt with as a programme of works
- Reduction in administrative work for Cornwall Home Solutions
- Provides an opportunity to reduce waiting times for all DFG applicants

- Enables OT virtual assessments to be trialled and evaluated
- Coastline Housing & Cornwall Council will be able to evaluate the benefits for their tenants
- Cornwall Home Solution's role becomes that of funder, with Coastline managing and organising the work on their own stock.

Once evaluated the project aims to build on the learning and develop stronger partnerships between social landlords such as Coastline, Adult Social Care and Cornwall Home Solutions to reduce the need for unnecessary handoff's across the teams and ensure tenants can engage positively with their social landlords at an early stage to receive adaptations that promote independence without delay.

Planned new process



There is clearly a lot of variation in partnership arrangements. They are much easier to sustain where authorities work with a few local housing providers. It is much more difficult to maintain arrangements with associations that operate in many local authority areas. National and regional associations may try to rationalise their own approach without understanding local situations or why services are provided differently in each area.

Changes in contributions

Since the rise in central government funding for the DFG more authorities are beginning to feel that DFG resources are sufficient to support all valid grant applications without housing association contributions.

However, 40% of authorities responding to the online survey said that that housing association contributions were still very important for the effective running of their service.

40% of authorities said association contributions were still very important.

“Very important, their contribution stretched our budget by at least 20% per annum (and probably far more, because of the adaptations that they complete without recourse to DFG)”

Local authority respondent to online survey

“As the demand for DFG rises it is becoming more important to obtain an HA contribution - one HA accounts for approx 40% of the work.”

Local authority respondent to online survey

Even where they were getting contributions a few authorities indicated that they were finding it more difficult to get payments.

“It is getting less and less every year; a lot are starting to plead poverty and say they can't afford it. For example, we had one that used to pay 50%, now they will only contribute 20%.”

Local authority respondent to online survey

“Some provided part funding on an ad hoc basis, subject to budget, but such cases are becoming fewer.”

Local authority respondent to online survey

Should housing associations contribute to DFG funding?

Most authorities responding to the online survey thought housing associations should contribute to the DFG but there should be more national consistency in the level of that contribution.

Several respondents found it hard to see why a housing association should get free

improvements to their properties using a full agency service, with one saying that even if they contributed 20% it would be value for money.

Other respondents said that, although contributions were not always essential to fund the service, they raised the profile of home adaptations and brought the needs of disabled tenants to the attention of housing association staff.

“ It helps to raise our profile with Senior Managers to justify the service, also it makes the Housing Associations acknowledge their disabled tenants’ needs.”

Local authority respondent to online survey

From the housing association perspective what adaptation staff wanted most of all was consistency. It is very difficult for them to understand the current confusing pattern of funding. They want to reduce the administrative headache associated with different amounts being required in each area with different payment methods.

Some associations want to take charge of adaptations themselves as it gives them control over contractor quality, makes sure there is compliance with health and safety criteria and ensures their asset management database is kept up to date. It also allows them to control what is fitted in their homes to make them easier to maintain. Some associations

are already paying the difference between the basic DFG specification and their own specification. The next chapter considers the options to rationalise funding arrangements.

“ We need something at national level – we need consistency”.

Interview respondent from national association.

The next chapter considers the options to rationalise funding arrangements.

SUMMARY: DISABLED FACILITIES GRANT (DFG)

- **DFG funding allocation has plateaued at £570 million per year** until 2024/25 (England)
- **DFG distribution is uneven** with some authorities receiving less than might be expected according to indicators of need.
- **Inconsistent DFG services** - some authorities have sufficient resources and fast services, while others have waiting lists. It makes it hard for associations to provide a fair and equitable service for tenants.
- **High use of DFG by housing associations** - they own an average of 11% of the private sector housing stock in England but on average 36% of DFGs went to their tenants 2019/20.
- **Uneven use of the DFG by associations** - the percentage of grants going to association tenants does not relate to the level of housing association stock in each area. In 21% of areas it was a close match, but in most authorities it was more than expected and in 12% of authorities it was very much higher than expected. High levels of DFG use mainly reflect LSVTs set up with no budget at the time of transfer.
- **Impact on other tenures** - unless housing associations contribute to DFG funding, in areas with high use of the DFG relative to stock levels there is a potentially negative impact on low income home owners and private rented tenants who also need to use the DFG.
- **Uneven levels of contribution** - levels of contribution to the DFG vary considerably from 10%-60% of the costs, with most local authorities getting no contribution.
- **40% of authorities said association contributions were very important** and allowed the effective running of their adaptation service. Some had strong partnership arrangements that they did not want to lose.
- **Contributions needed** - most authorities responding to the online survey thought housing associations should contribute to the DFG as it raised the profile of home adaptations and brought the needs of disabled tenants to the attention of housing association staff.
- **Complexity and confusion** - most associations and local authorities keep complex spreadsheets to understand the DFG arrangements in each area and who to contact if there are problems
- **The same contribution to be made in all areas** - both housing associations and local authorities want more national consistency in the level of contributions housing associations are expected to pay.

6. FUNDING OPTIONS

6. Funding Options

The previous chapter demonstrated how inconsistent the funding situation is for both housing associations and local authorities. How better uniformity might be achieved is more difficult to pin down. The aim must be to end the confusion, simplify the process, and reduce delays.

Dealing with funding issues

Options for altering the way DFG funding is allocated to housing associations were suggested in surveys and interviews with housing association and local authority personnel which include:

- The same set percentage housing association contribution to be paid in all areas.
- Top-slice DFG budgets, or pay associations on completion of work, so associations do more adaptation work themselves.
- Direct payments to housing associations as still happens in Wales (see box).

Wales – direct funding for housing associations, Physical Adaptations Grant (PAG)

The Welsh Government retained direct funding for housing associations alongside DFG funding.

Physical Adaptations Grant (PAG) for housing associations

- Minor adaptations up to £1,000 - associations do themselves using their own funding.
- If a case requires more work or is more complex - an independent OT does a needs-based assessment. PAG includes 15% for on-costs which covers employing an OT.
- Work costing less than £8,000 or aggregated works up to £15,000 – associations direct the contractor and on completion of work invoice the Welsh Government to get the costs reimbursed. This covers most cases such as stairlifts and showers. Work can normally be done within six weeks.

- If work is estimated to cost over £15,000 - the PAG team in the Welsh Government have to provide prior approval, but there are seldom delays. Costs are reimbursed in the same way as for less expensive cases.

Associations get three quotes for work, but the use of framework contracts is permitted. A sampling exercise is done periodically to check costs.

PAG provides a straightforward system for tenants who are passported through with no means test or bureaucracy to cause delays and tends to be much quicker than the DFG. PAG funding is provided by the Welsh Government from housing capital funding.

“ PAG is infinitely better for housing associations in my experience”.
Manager of one of the larger associations in Wales

The variety of authorities and associations

From the local authority perspective, those that have substantial contributions from housing associations will need compensating for lost funding if the system were to change.

On the housing association side, the problem is that the housing association sector is so varied. What might work for larger and well-resourced organisations may not work for smaller and

more specialist associations, or an LSVT set up with no budget for adaptations at time of transfer.

Resolving the confusion

Making sense of all these conflicting needs is not easy. Funding and responsibility were discussed at a Round Table event with people representing housing associations and local authorities, plus national organisations involved in housing and disability issues. It was agreed that under current social care and housing legislation the responsibility for disabled people and the DFG rests with the local authority.

However, this does not solve the current confusion over funding, the complex customer pathways and the lack of accountability of housing associations for the outcomes of adaptations.

Updating the DFG allocation formula

One way of solving the problem would be to ensure a fairer allocation of DFG funding. This would allow the need for contributions to either be removed entirely or set at a standard level. The 2018 DFG Review recommended that the funding formula was updated and suggested a new basis for measurement using a number of variables that provide a proxy for the level of need in each area. The Review acknowledged that it is not easy to develop a fair and transparent system as the calculations are complex:

- There is potentially unmet demand in all

areas as the number of people receiving a DFG in each local authority is still relatively small.

- Levels of local need are hard to calculate due to a lack of good, granular data about age, disability, poor health and income at local authority level.
- Means testing adds another layer of complexity.
- The efficiency and effectiveness of delivery varies between areas.

The Review did not make a firm recommendation about how housing association use of the DFG should be accounted for in the funding allocation. This current research has shown that there is very uneven use of the DFG by associations. Areas with high housing association use of the DFG struggle to meet demand, particularly if

associations do not contribute.

Use of the DFG by housing associations must be included in any new funding formula but it is clearly not an easy calculation due to the uneven use of the DFG relative to stock levels.

Use of the DFG by housing associations must be included in any new DFG funding formula.

DFG Funding options

Several options are listed in Table x. Some would require a change in the DFG legislation, others could be implemented through guidance, and some require a change in the funding allocation.

Table 6.1 Options for changing the way housing association adaptations are funded

Options	Details	Advantages	Disadvantages / Implications
1.	Do nothing – let each HA and LA decide on its own arrangements for DFG contributions as happens now.	<ul style="list-style-type: none"> • Authorities which have strong partnership arrangements would prefer the system to stay the same. 	<ul style="list-style-type: none"> • Does not solve the current confusion for both HAs and LAs and inequalities for all DFG applicants.

Options	Details	Advantages	Disadvantages / Implications
Major Change			
2.	<p>Housing associations fund all adaptations themselves</p>	<ul style="list-style-type: none"> • The outcome hoped for when direct funding ended in 2008. • HAs fully responsible for the needs of tenants. • Customer journey clearer and faster - no handovers or means testing. • Brings HAs into line with council stock/ALMOs. 	<ul style="list-style-type: none"> • Would be difficult to justify. • HAs legally allowed to use the DFG so would need a change in legislation. • Would still need subsidy. • Smaller HAs and those with scattered stock rely on access to LA agency services/HIAs • LAs often advocate on behalf of tenants – if not involved this assistance would not be available.
3.	<p>Direct payment for work completed as happens with PAG in Wales.</p> <p>Each HA to claim costs of work plus 15% on-costs from central government.</p>	<ul style="list-style-type: none"> • Works well in Wales. • Customer journey clearer and faster – no handovers or means testing. • HAs fully responsible for needs of tenants. • Allows separate reporting on spending to make HAs more accountable. 	<ul style="list-style-type: none"> • Only a small number of HAs/LAs in Wales - harder to administer in England • Who would administer it– DLUHC/DHSC, Better Care Fund, Homes England? • Smaller HAs and those with scattered stock need access to agency services. • LAs often advocate on behalf of tenants – if not involved this assistance would not be available. • Still need local housing/ health/care partnerships.

Options	Details	Advantages	Disadvantages / Implications
Medium Change			
4.	<p>No HA pays a contribution to the DFG – requires changing the DFG allocation formula/ increase in DFG funding.</p>	<ul style="list-style-type: none"> • Ends confusion for HAs with stock in multiple LAs, and for LAs dealing with numerous HAs all with different contribution amounts. 	<ul style="list-style-type: none"> • Need a new funding formula as some authorities would lose considerable HA contributions. • Ideally needs an overall increase in DFG funding. • If there was no contribution to the DFG adaptations might lose any importance for some HAs.
5.	<p>Each association to make the same contribution – requires changing the DFG allocation formula/ increase in DFG funding.</p>	<ul style="list-style-type: none"> • Clearer and fairer than current system as all contributions the same. • HAs should contribute something to the work done to their properties. • Keeps adaptations on HA agendas. • Brings associations more into line with council stock and later LSVTs. 	<ul style="list-style-type: none"> • If HAs pay a contribution, what percentage is fair? • Need a new funding formula as some authorities would lose considerable HA contributions. • Ideally needs an overall increase in DFG funding. • Some very small or specialist HAs might need to be excluded from making contributions.

Options	Details	Advantages	Disadvantages / Implications
Change that could be implemented now - alter the delivery methods			
6.	<p>Each authority to top-slice DFG funding to give HAs their own allocation.</p>	<ul style="list-style-type: none"> • Many HAs want to manage work themselves. • This is already being done in some areas. • Would push adaptations up HA operational agendas. • HAs could top-up to improve design. • Could be part of a broader partnership agreement. 	<ul style="list-style-type: none"> • May not work for smaller HAs and those with scattered stock. • Need to make sure that the tenant is at the heart of decision-making and there is an effective advocacy and complaints process. • Needs effective reporting on outputs and outcomes as a condition of funding to ensure that the LA can meet their statutory responsibilities and can complete the annual DELTA return to DLUHC.
7.	<p>Use landlord not tenant applications. More details in Chapter 6.</p>	<ul style="list-style-type: none"> • Would work for all HAs/LAs. • Would provide a named contact person in the HA. • Reduces the time taken to get landlords' consent. • Removes the means test. • Gives HAs more control over the work. • LA retains control over funding to fulfil their statutory responsibilities. 	<ul style="list-style-type: none"> • Need to make sure that the tenant is at the heart of decision-making and there is an effective advocacy and complaints process. • Needs standard paperwork to make this work effectively across England (example in Appendix A).

Weighing up the options

- **Option 1 to carry on as things are now** - is not working. It only works in areas where there is a big DFG allocation or where strong local authority leadership has allowed the negotiation of large contributions. However, it is not working for a) associations that operate over numerous local authority boundaries all with different arrangements, b) for authorities with a high proportion of their budgets going to associations but where allocations are not sufficient, or c) authorities with a confusing patchwork of contributions.

It leads to considerable inequalities. Housing association tenants from different associations may get very variable services, while tenants of the same association get a different service depending on where they live. It also impacts disabled people from other tenures. Owners and private rented sector tenants are unlikely to hear about the grant if pressures on funding mean it is never advertised, while others may face long delays in getting help.

- **Options 2 and 3 major change** – making associations fund their own adaptations in the same way as the council stock is not feasible without a change in the legislation and would be difficult to justify. Returning to direct payments to housing associations is possible, but it is not clear who would administer it if it was taken away from local authorities. This

would also go against plans to more closely integrate housing, health and social care at local level.⁸³

- **Options 4 and 5 medium change** – either removing housing association contributions entirely or making it a standard percentage contribution would require a change to the allocation formula to compensate those associations dependent on contributions. Local authorities feel that Option 5 (having a standard contribution) would be preferable as it puts home adaptations more clearly on the operational agenda of housing associations. Some smaller and more specialist associations may not be able to afford to contribute and may need to be excluded.

- **Options 6 and 7 alter the delivery methods** - could be introduced more easily. Top slicing is already being used in some areas. Landlord applications could have a lot of advantages which are discussed in more detail in the next chapter. A change in the allocation formula is still needed to get a fairer spread of resources. Where associations take over the work, effective reporting on outputs and outcomes is needed to ensure that authorities can meet their statutory responsibilities and can complete the annual DELTA return to DLUHC.

We need to remember that while the confusion about funding continues it can lead to long delays and has an adverse effect on many

83 Department of Health and Social Care (2022) Joining up care for people, places and populations: The government's proposals for health and care integration, CP 573.

disabled and older people's lives. It is also very frustrating for frontline staff in all organisations. There is an urgent need to sort out the muddle and come to an agreement.

There also needs to equity with the council stock and LSVTs with their own budgets:

- The self-financing agreement for the council stock in 2012 included £116 million of extra funding each year for adaptations, but many councils are now struggling to meet the current cost of adaptations.⁸⁴
- LSVTs with designated budgets for adaptations have some of the best adaptations policy and practice, but they are not being treated the same as other housing associations in terms of central government funding.

Consultation about further changes to the DFG

Consultation about changes to the allocation formula, the upper limit of the DFG, and the means test was announced at the end of 2021. There are also plans to introduce Section 36 of the Equality Act to allow more adaptation of the common parts of dwellings. The following sections look at each of these in turn.

Although not part of the consultation exercise it is also important to think about home technology and how this is funded, as this is becoming a more central part of the adaptation process.

Any changes made should attempt if possibly to simplify the current funding and delivery arrangements.

What is needed is consistency and transparency so that disabled people from all tenures get a similar adaptation service no matter where they live.

Allocation of DFG resources to local authorities

It is very important that changes to the way DFG funds are allocated to local authorities take into account:

- Uneven housing association use of the DFG – it does not equate to the national average or to level of association stock in each area; in some areas it is much higher. These are often authorities with considerable pressure on budgets.
- How much housing associations should contribute to DFG funding to make it consistent across England.
- The impact of any increase in the upper limit of the grant on local authority budgets.
- The impact of any change in the means test on local authority budgets.
- The impact of introducing Section 36 of the Equality Act relating to common parts on local authority budgets.

A change in the DFG funding formula would mean some authorities would get more funding

⁸⁴ Wilson, W. (2021) Disabled facilities grants (DFGs) for home adaptations, House of Commons Library, No. 03111.

while others would get less. Ideally a change in allocations should be accompanied by an increase in DFG resources. This would prevent any authority having to cope with their allocation being reduced as there are high levels of need for adaptations everywhere. However, DFG funding appears to be staying static at £570 million until 2024/25. If there is no increase in the overall allocation amount, new arrangements for funding would need phasing in to allow local authorities to adjust.

Funding over the upper limit

The majority of adaptations cost less than £15,000 but a small minority cost considerably more. Although national allocation levels have gone up since 2015, at the time of writing there has been no change in the upper threshold of the grant which has been fixed at £30,000 since 2008. This is not enough to cover the costs of more complex work, such as extensions or major reorganisation of the living space.

The upper limit may be raised as part of a government consultation announced at the end of 2021. As part of their Housing Assistance or RRO policies some authorities have already increased the limit to £40,000 or £45,000, but they still need contributions for work over this amount. Some extensions can cost £70,000 or more.

Housing associations are usually expected to contribute to the costs, particularly where it creates a bigger or more valuable home. However, there is usually no provision in housing association adaptation budgets which only cover minor works and average DFG contributions. It is a major problem if there are a cluster of these more expensive cases in a single year.

If there are protracted discussions about who pays it can lead to considerable delays and suffering for the families involved. When additional funding for extensions is not found, it may result in adaptation designs being restricted to fit the current upper limit which may not fully meet the needs of disabled person and their family.

For example, instead of building a ground floor extension, reception rooms are often repurposed. However, this removes rooms used for family activities and sometimes the accessible spaces created are cramped and difficult to use. The DFG Review also showed that there was a poor standard of work if funding was not found to properly supervise these projects.⁸⁵

The right staff in housing associations need to be fully involved in these cases. Moving home often provides a better solution, with fewer adaptations needed to the new property. Occasionally a brand new accessible home can be customised at the planning stage or

85 Mackintosh, S., Smith, P., Garrett, H., Davidson, D., Morgan, G. and Russell, R. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England.

before completion. If extensive adaptations are required there is often a need for temporary accommodation which the parent association would be best placed to provide. These cases need a more integrated approach.

There are several potential solutions to the funding of expensive adaptations, some of

which were recommended in the 2018 DFG Review (Table 6.2). The most important for housing associations is to use capital works budgets rather than relying on meagre adaptation budgets to pay for these cases, and for the business case to show the full costs and benefits of the work.

Table 6.2 Options for changing the way adaptations over the upper DFG limit are funded

Options	Advantages
<p>1. Increase the upper limit in line with inflation, regional building costs, and the cost of project management - as recommended in the 2018 DFG Review.</p>	<ul style="list-style-type: none"> • Gives a clear rationale for the upper limit in each area and deals with regional variations in costs. • Would cover fees for professional design and project management to deliver complex cases more successfully. • Would speed up the service for tenants by avoiding arguments about who pays. • Some authorities have already used their discretion to raise the upper limit in local Housing Assistance Policies, but this needs to be applied consistently and transparently in all areas.
<p>2. A business case to provide a clear basis for any additional funding over the upper limit - as recommended in the DFG Review.</p>	<ul style="list-style-type: none"> • Would show the increase in value of making a home more fully accessible and adding to the stock of accessible homes. • Would show the benefits and cost savings of creating a long-lasting tenancy. • Would demonstrate the savings in health and care costs of keeping people living as independently as possible in the community.
<p>3. Use housing association capital works budgets for extensions and complex cases above the upper limit of the DFG.</p>	<ul style="list-style-type: none"> • More appropriate source of funding and would minimise the impact on limited housing association adaptation budgets. It would also engage a housing association team used to dealing with major building projects.
<p>4. Use modern methods of construction (MMC) for extensions.</p>	<ul style="list-style-type: none"> • Prefabricated panels or modular units minimise disruption, reduce labour costs and provide extensions faster.

Funding adaptations to common parts of dwellings

Most work to the common parts of dwellings (such as entranceways, hallways, stairs, emergency exits, passageways and paths) is currently done by associations themselves.

“Most authorities won’t carry out DFG works to common parts so we try to carry these out where we can e.g. during planned work. Sometimes we can have grey areas when it is a bathroom adaptation in a house that is shared by multiple residents.”

Housing association survey participant.

Section 36 of the Equality Act 2010 covers adaptations to common parts, but there was a delay in enacting this part of the legislation in England and Wales. The aim of Section 36 is to make it easier for disabled people to enter and leave their homes. There are several issues that still need to be resolved.

- It is not clear what counts as common parts under The Equality Act and if it is the same as the definition in the HGCRA 1996 Act that covers the DFG.
- A landlord has a duty to make ‘reasonable adjustments’ if a tenant asks for adaptations to common parts of the property. However, the landlord or managing agent must consult all other tenants and people with an interest. There is no definition of what would count as a legitimate objection in either the DFG or equalities legislation.
- The Equality Act allows landlords to ask

tenants to pay for the work, but tenants on low incomes or with disabled children can apply for a DFG. However, a tenant application may not be permissible for work the tenant does not have the power or duty to do themselves. If it allowed as a tenant application, is it fair for it to be means tested?

- This report recommends landlord applications for the DFG. It seems even more appropriate that common parts applications are made the landlord. At present the landlord only has a duty to give permission, not to make an application.
- If the landlord applied and was required to pay a contribution if the rent increased, it might prevent work going ahead.
- In cases where there are multiple landlords or leaseholders an owner’s certificate would be needed from them all for work to proceed.
- In all cases the work would also have to be deemed necessary, appropriate, reasonable, and practical to qualify for a DFG.
- The DFG does not normally cover on-going maintenance or the removal of adaptations after a disabled tenant moves out. Maintenance may have to be paid by the disabled tenant or added to the service charge for all residents (it should be covered by Universal Credit). However, tenants have no control over communal spaces and if a stairlift or other adaptation is damaged or vandalised is it fair that they are responsible for the costs of repair or replacement?

The 2018 DFG Review tried to put a figure

on the costs of introduction, but the lack of detailed property data for most areas made this very difficult.⁸⁶ If enacted, it could result in significant pressure on DFG funds.

Outstanding issues about common parts needing to be resolved

- A clear definition of common parts.
- Who applies for a DFG – tenant or landlord?
- What happens if there are multiple landlords, especially in leasehold blocks?
- Does the DFG means test apply?
- How should costs be apportioned if there are multiple disabled tenants?
- Should landlords contribute towards costs?
- A clear definition of what would count as a legitimate objection.
- How should maintenance, repair, replacement and removal be organised and paid for?

Changing the means test

In relation to social housing, the way the means test currently operates varies. Some authorities do not means test any social housing tenants at all; others means test housing association tenants but not council tenants. A few housing associations top up if a tenant must pay a contribution, but others do not. The way the means test currently works is very inconsistent and unfair.

There also needs to be agreement about how means testing would operate in relation to

adaptations in the common parts of dwellings once Section 36 is introduced.

If landlord applications are used for the DFG and common parts adaptations this should remove the need for housing association tenants to be means tested, but local authorities need to be able to afford to cover any increase in costs. It also raises issues of equity for private sector tenants.

Aligning the DFG means test with that for social care could resolve some of these problems and make the system more equitable.

Funding home technology

Home technology is becoming an increasingly important aspect of home adaptations and something that housing associations are keen to adopt to keep tenants independent.

Some disabled people are already using smart plugs, video doorbells, remote heating and lighting controls and other devices to control aspects of their homes via interactive speakers or from their phones, tablets and laptops. They are also using technology to keep in touch with family, friends and carers. Some associations rely on technology to keep in contact with tenants.

One positive aspect of Covid-19 is that it hastened the uptake of technology among a wide range of consumers and upended myths about older people not being able to use IT. The main problem is the range of products

86 Mackintosh, S., Smith, P., Garrett, H., Davidson, D., Morgan, G. and Russell, R. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England.

emerging and the lack of easy to use apps and interfaces that connect all the different aspects of the ‘internet of things’. Many people also fear relying on technology when they do not know how to fix things when they go wrong or if there is a power cut.

However, for people on very low incomes the problems go much deeper. It is not just affording these devices, but lack of digital skills, unequal access to broadband and WiFi, and inability to pay for on-going subscription costs. Covid-19 has exposed the digital divide in the UK, particularly for people with disabilities and long term health conditions.

“**Of the eight million in the UK who don’t use the internet, 90% suffer from other kinds of economic or social disadvantages. They are also more likely to be in the lowest income bracket and/ or be disabled with long-standing health conditions.**”⁸⁷

Some local authorities are using joint health and social care Community Equipment funding to provide devices on loan to help with care, alongside providing personal alarms and care lines. Some authorities are also using the DFG allocation to provide discretionary funding to pay for some home technology items for specific needs, such as dementia, or providing home technology as part of a bigger DFG package.

Housing associations are at forefront in using new technology, particularly in new-build retirement housing and some major refurbishment projects. They are also funding pilot projects to demonstrate the health and care benefits of home technology.⁸⁸

Community equipment provision and the DFG will not reach most disabled and older tenants. Housing associations will need to provide their own support to tenants. This might include supplying broadband and low cost equipment. They could also offer advice services to help people make good decisions about what to buy themselves, how to keep their data secure, how to ensure no loss of service in power cuts, and training for those without IT skills.

87 https://www.cam.ac.uk/stories/BeyondThePandemic_digitaldivide.

88 Technology for our Ageing Population: Panel for Innovation (TAPPI) <https://www.housinglin.org.uk/Topics/browse/Design-building/tappi/>.

SUMMARY: FUNDING OPTIONS

There are several options to change the way home adaptations are funded for housing associations:

- **Carrying on with the current DFG funding system** does not work in most areas. People delivering services do not understand the reasons behind the inconsistencies, it is confusing, and it leads to considerable inequalities for customers from all tenures.
- **Making associations fund their own adaptations** in the same way as the council stock is not feasible without a change in the legislation and would be difficult to justify.
- **Returning to direct payments** is possible, but it is not clear who would administer it if it was taken away from local authorities, and it would also go against plans to more closely integrate housing, health and social care at local level.
- **Removing housing associations contributions to the DFG** would require an overall increase in resources and a change to the allocation formula to compensate authorities dependent on those contributions. It also takes responsibility for major adaptations away from housing associations.
- **Standard percentage contribution** - local authorities and associations would prefer having a standard contribution but a change in the allocation formula is needed to get a fairer spread of resources to compensate authorities that would lose contributions. Some smaller and more specialist associations may not be able to afford to contribute and may need to be excluded.
- **Top slicing the DFG** is already being used in some areas and has advantages as many associations want to manage work themselves. However, it would only work for certain associations. If used, it might be best as part of a broader partnership agreement. The local authority would need to receive output data to show it is meeting its statutory duty and to make the annual DELTA return to DLUHC.
- **Landlord applications** have a lot of advantages for housing associations and local authorities in terms of earlier intervention, speeding up the process, and providing a named contact to remove communication problems. This could be introduced right away but it needs a nationally agreed form so it is consistent across all parts of England - see Appendix A.
- **The self-financing agreement for the council stock** also needs looking at, as many councils are struggling to meet the cost of adaptations in their own stock.

Consultation on further changes to the DFG needs to include the issues about housing associations identified in this report:

- **Allocation formula** – needs to take account of the high but uneven use of the DFG by housing associations. Forthcoming changes to the DFG (to the upper limit, means test and Section 36 common parts) will also have an impact on the level of resources needed.
- **Upper limit of the DFG** – HAs and LAs need a business case for expensive cases, use capital works budgets rather than adaptation budgets for these cases, and where possible they should use modern methods of construction for extensions.
- **Section 36, common parts** – there are a lot of unresolved issues that government needs to address before this is introduced to make clear the respective responsibilities of landlords, local authorities and tenants.
- **Means test** - the way the means test currently works is inconsistent and unfair. Some authorities have removed it, but others have not. Where means testing is used, housing association tenants are often means tested but council tenants often not. Landlord applications for the DFG could remove means testing for housing association tenants. Aligning the DFG means test with that for social care could make the system more equitable.
- **Home technology** – is an increasingly important part of the housing solutions for disabled and older people. Some is funded from health and social care community equipment budgets and some from the DFG, but this will not reach most disabled and older tenants. Housing associations will need to provide their own support to tenants.

RECOMMENDATIONS - DFG FUNDING

HOUSING ASSOCIATIONS

- Landlord (not tenant) applications to be used for DFG cases.
- Use capital works budgets (not limited adaptation budgets) to contribute to expensive cases above the upper threshold for DFG funding.

LOCAL AUTHORITIES

- Landlord (not tenant) applications to be used for all housing association DFG cases using standard paperwork (see Appendix A).
- Top-slice DFG funding for specific associations to allow them to manage work themselves.

CENTRAL GOVERNMENT

- Update the DFG allocation formula to take account of housing association use of the DFG.
- Issue guidance to make the level of contribution to the DFG consistent for all housing associations across England.
- Resolve issues about the funding of common parts before Section 36 of the Equality Act is enacted and provide guidance to local authorities and landlords.

7. IMPROVING THE DELIVERY PROCESS

7. Improving the Delivery process

Adapting homes was not originally designed as a distinct service, but has evolved over time with responsibilities split between different local authority departments and social care landlords. The result is an overly complex customer pathway with many handovers (Figure 7.1).

Although there are often formal and informal agreements between housing associations and local authorities about funding contributions, it is less common to have service level agreements to make the delivery process work more effectively.

Putting the tenant at the centre

The tenant, their family and carers need to be at the heart of decisions about changes to their home, but this is difficult when so many organisations are involved. In some cases, particularly if a tenant is referred for adaptations by health or social care, the

landlord may not know the tenant needs help with their home until they are a long way through the process of getting an assessment and applying for a DFG.

There are several changes that could be made to put tenants at the centre, give them a single point of contact, give landlords more control over the process, and make the customer pathway quicker and more efficient.

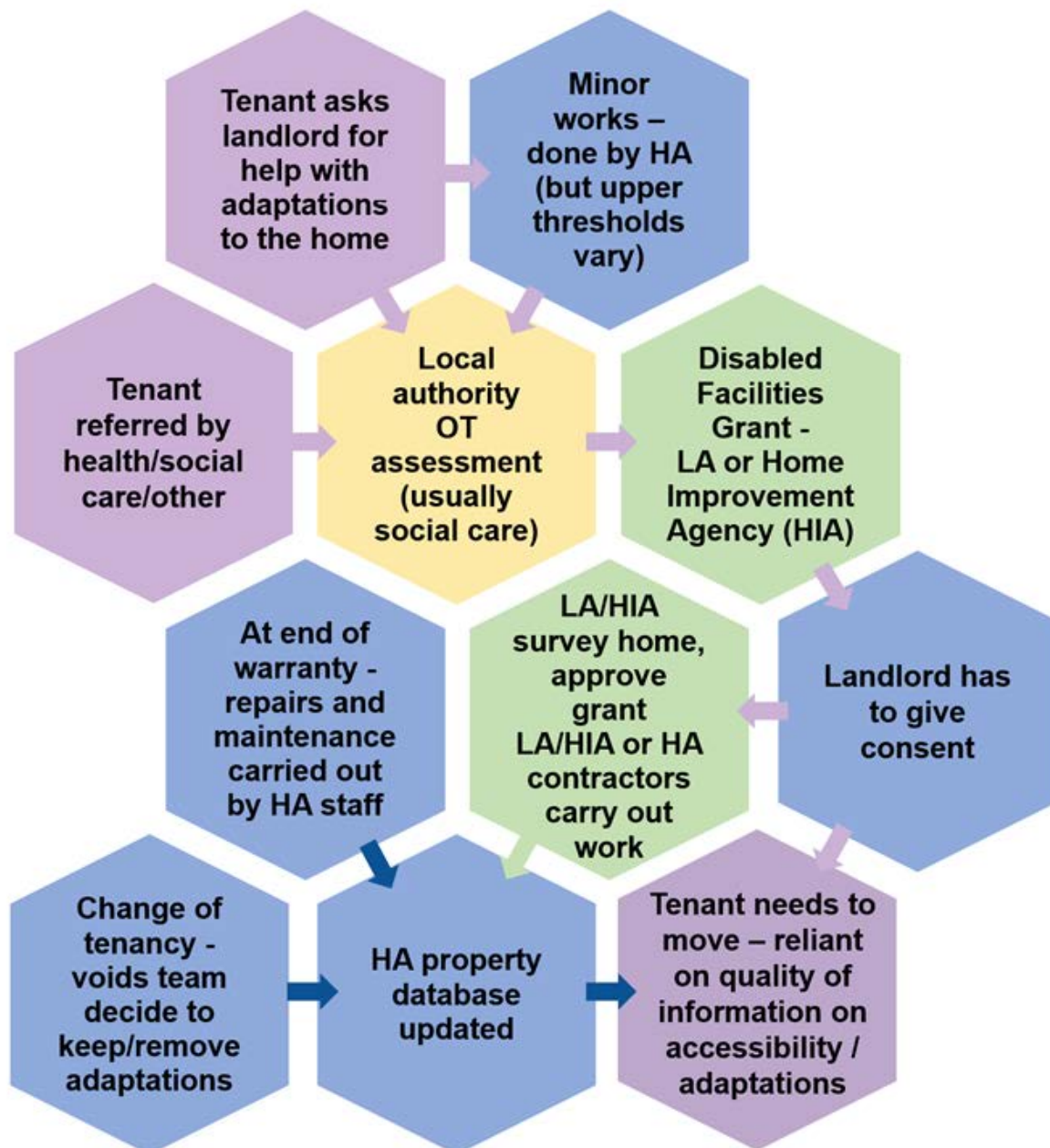
Website Information

For a tenant, the start of the customer pathway is to find out about any help. Some find out about adaptations because of the intervention of a health or care professional. However, most people do not know what adaptations are available, and do not know what to search for, so information needs to be easy to find.

A brief review of a sample of 20 websites of housing associations (all ones which responded to the online survey) showed that:

- Some make it very easy to find information

Figure 7.1 The complex pathway to obtain home adaptations or a move to a more suitable home



on adaptations with it clearly signposted from the home page. The best websites were welcoming and friendly with clear information about what would be provided, how long it might take, and a link to the full policy.

- For others information was hidden deep within the website, many clicks from the front page.
- A few websites had nothing on home adaptations listed at all.

If they need help, most tenants are likely to ring the customer service line. Previous mystery shopping done as part of scrutiny work for adaptations agreements in the South West of England showed that this is a weak link in the process. There is often a high turnover of frontline staff and not always a consistent approach. Customer service staff sometimes direct people to the local authority when work could have been carried out more rapidly by the landlord.

Given the high proportion of disabled tenants it is important that appropriate routing is embedded in automated systems and is included as part of training in all associations.

Adaptation staff in housing associations

Aids and adaptations teams within housing associations are limited in size, often a single person. In smaller associations it may just be a part of someone's role in the asset management team. In the online survey conducted for this project 20% of associations had no lead officer for home adaptations and 13% no adaptations policy, so it is often a very hidden part of operational activity.

The people interviewed in depth as part of this study were all in dedicated roles with most covering between 5,000-10,000 homes.⁸⁹ Almost a third were running services for regional or national associations with over 10,000 properties. Regardless of size of organisation, nearly all adaptations staff were working on their own, or with only part time help, although some big national organisations had regional staff who were able to support each other. Many staff are based in offices a long way from the tenants needing support.

“**I'm the adaptations lady.**”

Interview respondent from a big regional association.

Most felt that local authorities did not realise

⁸⁹ Note: perhaps inevitably the online survey and follow-up interviews were not fully representative as responses were from dedicated staff, not organisations where no-one is in a specific home adaptations role.

the limited staff resources in big housing associations. One respondent from a very large national association said she had to keep pointing out, “**there is only me you know**”.

Adaptations officers come from different backgrounds, mostly from customer services, administrative positions, or previous work with older people, although a few had been in asset management. The majority were now based in asset management teams, with most of the rest in retirement living services.

All shared a real passion for their role and clearly went out of their way to help their residents, despite high workloads and sometimes inflexible funding and delivery arrangements. However, they pointed out that services can be fragile (see box).

Dependency on a single individual makes services fragile

- New staff need to pick up complex cases very quickly.
- They deal with a confusing picture of local authority services using detailed spreadsheets.
- Holidays or sickness means a backlog of cases as there is seldom anyone to provide cover.
- It affects communication with residents.
- It limits post-inspection calls/visits to uncover any issues and problems
- There are no resources to measure outcomes that could feedback into improving services.

Occupational therapists (OTs) in housing associations

Only 10% of associations in the survey employed an OT, mainly LSVTs with their own substantial budgets and locally concentrated stock. The organisation that supports OTs working in the housing association sector (HAFFOT)⁹⁰ said that the numbers of OTs employed directly has declined over the past decade. However, 25% of organisations responding to the survey had someone trained as a Trusted Assessor able to do basic assessments for minor adaptations.

Most associations rely on the local authority to provide assessments for major adaptations, and a few even do this for minor works. Some have built good relationships, but several mentioned the long wait for assessments and that staff changes in the local authority can disrupt continuity of care for tenants.

“ Good working links established between the HA and LA. Joint visits carried out where appropriate and both services will refer to the other when necessary.”

Survey respondent.

“ We generally have a good relationship with LA OT services and in the past have had a dedicated OT which was very helpful. Most frustrating for our tenants is the length of time before assessment

[and] frequent staff changes.”

Survey respondent.

Housing association adaptations staff do not want to use OT resources unnecessarily but without bigger budgets and their own specialist staff large numbers of cases get referred.

Local authority staffing levels

The doubling of DFG capital funding after 2015 happened at a time when there had been considerable reductions in local authority personnel as part of austerity measures. As the DFG is capital not revenue funding it was difficult to use the money to employ more staff. Authorities can charge a fee to cover staff costs, but only for work that results in the acquisition, construction, addition, or enhancement of an asset. As a result, many authorities struggled to deal with the increased throughput of cases.

The DFG is often delivered by more than one department within local authorities. OTs are usually based in social care (often at county level) while the DFG team of caseworkers and technical officers is in housing departments at district level or in a separate home improvement agency.

The 2018 DFG Review recommended that services be integrated to remove handovers and multiple waiting lists and allow better collaboration between caseworkers, OTs and

90 Housing Association Forum for Occupational Therapists (HAFFOT) <http://www.haffot.org.uk>

technical staff.⁹¹ More OTs are now employed within DFG teams which helps reduce backlogs.⁹² In a few cases DFG teams have been amalgamated across several districts or whole counties which reduces overheads and provides more support for staff. Adaptations in the council housing stock is integrated with the DFG service in some areas to create a complete cross-tenure service, but this does not happen in all areas with retained council stock.

Using local authority OTs for the right cases

If a person needs a local authority OT assessment, the first point of contact is usually social care. From there people are referred to a social care OT or to the integrated adaptations service.

OTs were asked if the right type of cases were coming through to them. Over a third of those responding to the online survey said 'yes', but almost two thirds said that that some were inappropriate, with half being cases they thought associations should do themselves.

The reasons included::

- Using the OT as a gatekeeper to ration budgets.
- Referral of minor adaptations to social care when budgets run out.

- Wanting an OT referral for any adaption, even very small changes to the home.
- Wanting an OT assessment before people could be put on a waiting list for a more suitable home.

A practical guide specifically for housing associations was published in 2006 by the Housing Corporation and the Royal College of Occupational Therapists to show what adaptations could be carried out without an OT assessment.⁹³ This has since been updated as a report called Adaptations Without Delay (see box). Most minor work and some straightforward major work does not need an OT assessment.

If these guidelines were followed it would speed up the process for many tenants and take the pressure off local authority OTs so that they can concentrate on more complex cases where their skills are really needed. However, it requires housing associations to have adequate adaptation budgets and for more staff to be trained as trusted assessors. Trusted assessor training is available from Disabled Living.

91 Mackintosh, S., Smith, P., Garrett, H., Davidson, D., Morgan, G. and Russell, R. (2018) Disabled Facilities Grant (DFG) and Other Adaptations: External Review, Bristol: University of the West of England.

92 Smith, P and Williams, J. (2019) Disabled Facilities Grants: structures and staffing, Glossop: Foundations.

93 Royal College of Occupational Therapists (2019) Adaptations without delay: A guide to planning and delivering home adaptations differently. London: RCOT.

Non-complex work without OT assessments

The Royal College of Occupational Therapists guide 'Adaptations Without Delay' makes it clear that straightforward work for clients with non-complex conditions can be done without an occupational therapy assessment. Associations have no need to refer everyone to the local authority. This includes most minor adaptations and some straightforward major adaptations.

The 2018 DFG Review provided the following table to help understand what might be considered straightforward and what work needs a higher level occupational therapy or technical input.

The nature of the case	How the case can be managed
The person's situation is non-complex and the adaptation is non-complex	With appropriate advice and support (e.g. from a handyperson or trusted assessor) the case could be managed by the person, carer or family member.
The person's situation is non-complex but due to the structural nature of the property it is complex to adapt.	Housing professional leads the case but consults with an occupational therapist if needs arise or change.
The person's situation is complex but the home is not complex to adapt	Occupational therapy team leads the case but consults with housing team if advice is required on the design of the adaptation.
The person's situation is complex and the structural changes required to provide a solution are also complex.	Joint housing professional and OT management of the case.

Where local authority OT involvement is needed waiting times vary. Covid-19 led to backlogs, but it also allowed the introduction of telephone and video assessments which have proved very successful and have allowed a greater throughput of cases. More complex cases and people without access to technology still need home visits, and there are long waiting times in some authorities.

Housing associations sometimes commission their own assessments from external OTs, especially if there is a long wait for a local authority OT. However, some authorities will not accept external assessments, insisting on them being done again by their staff, leading to further delays. Agreement is needed with authorities to avoid duplication of effort and delays to applications.⁹⁴

94 Mackintosh, S. (2019) Ending local authority waiting lists, The OT Practice.

Landlord versus tenant applications

Nearly all local authorities receive DFG applications from tenants rather than from landlords. Landlord applications could potentially resolve some major issues:

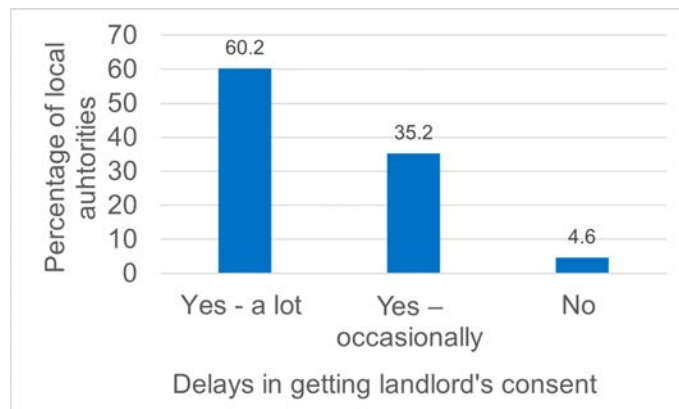
- For local authorities – to reduce delays in getting the landlord’s consent for work.
- For housing associations – to get a more consistent approach to delivery and more control over the process.

Delays in getting consent

The biggest delay for OTs and DFG teams is getting landlord’s written consent to allow work to go ahead, and to obtain any relevant paperwork. Almost two thirds (60%) of staff responding to the local authority online surveys said that delays happened ‘a lot’ and a further third (35%) said it happened ‘occasionally’. Only 5% of authorities said these delays never happened (Figure 7.2). Where delays occur, they are compounded by communication problems if there is no named person to approach for consent.

A few authorities have service level agreements with their housing association partners which include agreement in principle for certain types of work so that permission does not have to be sought for each application. However, these are not used by many authorities, do not cover all types of work, and do not always cover all the associations operating within a single area.

Figure 7.2 Delays in getting consent/ paperwork from housing associations



Source: online survey of OTs and DFG teams

Communication problems

There are often good relationships with associations that have a lot of stock in a local authority area but poorer communications with others. In the online surveys, OTs and DFG team members said it is often very difficult to find the right person to talk to and that staff change frequently due to mergers and restructuring. As we have seen there is often only one member of staff responsible for adaptations in each association and some have no-one in a dedicated role.

Constant chasing was clearly a time-consuming problem for local authority staff already juggling heavy workloads. The following comments were typical:

“Those we work with regularly/have good working relationships tend to be quick. Those who we work with less frequently/don’t know who to contact can

take longer.”

“ Great with the larger HAs, the smaller ones it is much more difficult as they don’t tend to have an ‘aids and adapts’ co-ordinator so requests will go round in circles (sometimes for months) until they are dealt with.”

“ All different & take very different approaches in meeting the needs; all have time delays unless a simple adaptation i.e. grab rails, but more complex work can take months to resolve i.e. permission to explore, final decision requested etc.”

“ Apart from the local large social housing landlord there is no SLA (or similar) with the smaller ones. Allocations for adaptations differ from one smaller housing landlord to another, most often there is no funding, and finding a point of contact can be an issue. All very decentralised, lacking integration.”

“ It varies, some working relationships are very good some are difficult to communicate with. For some HA’s the address you send adaptations requests to tends to vary, it’s difficult to keep on top of the latest address. Some of them struggle to open secure emails.”

“ Poor relationship, constantly chasing the housing associations to respond, not able to progress work effectively which impacts on the client.”

“ Most HA’s seem to thrive on anonymity, it is sometimes impossible to get a name, never mind a contact number/email.”

Respondents to the OT and DFG team online surveys

Local authority staff have developed their own solutions to communication problems through getting mobile numbers, joint visits, using caseworkers to chase requests, and sheer persistence. Most try to have regular meetings and monthly reporting with the associations that are the biggest users of the DFG, but these are sometimes hard to sustain. Landlord applications (discussed further below) might remove some of these considerable communication problems.

The previous chapter discussed the views of housing association staff who also felt there were good relationships with some authorities, but who were equally frustrated with the difficulties of communication and the high turnover of OT staff in some places.

Lack of consistent paperwork

From the housing association perspective, the main complaint is that there is no nationally accepted set of DFG paperwork; each authority has its own way of doing things. Some authorities send all the paperwork in one go with any accompanying documents (e.g. asbestos survey) while others send paperwork in stages leading to delays and items getting lost.

“ If all authorities did everything the same way, it would make life easier for people like me who have to deal with all of them. They don’t even have the same paperwork.”

Interview respondent from a national association.

An increased focus on health and safety issues means that housing associations often add their own paperwork to cover Construction (Design & Management) Regulation (CDM) compliance. This paperwork needs to be completed for all jobs, even those which are relatively small or where the local authority is running the project with no housing association contribution to funding. Each association has its own set of forms which adds to the delays in getting paperwork completed.

Inconsistent project management

The housing association online survey and interviews revealed that the current arrangements for project management are very confusing for associations that work in multiple authorities:

- A full home improvement agency service is provided by some authorities, but a more limited service in others.
- Some authorities control the whole process, some allow a housing association to schedule and carry out the work, others do the schedule allowing housing association contractors to do

the work.

- Some authorities ask for 2-3 quotes even when associations have an in-house contractor.
- Authorities often specify different materials to those used by associations making maintenance and repair more difficult.
- There are sometimes different processes for different cost thresholds. For example, in one authority an association was allowed to get their own quotes up to £5,000 but there was a different process over £5,000.
- Some always propose a level floor shower, others a low profile tray, while others provide a shower with the capacity to replace it with a bath on the same footprint.

Achieving consistency over more than 300 local authorities is difficult.

“ From a landlord’s perspective it is so confusing. I get so confused about who is doing what. You have to know so much about so many different places. I wish they would all operate the same way.”

Interview respondent in a regional association.

Advantages of landlord applications

The 1996 DFG legislation and guidance allows an application to come from the landlord. We suggest that local authorities and associations use landlord applications for the following reasons:

Advantages for the tenant:

- The tenant has one point of contact – their landlord.
- The landlord is made aware earlier that a tenant needs help with their home.
- It will initiate better discussions about housing options.
- It will reduce delays in getting consent and speed up the process.
- Removing the means test reduces paperwork.
- No means test will help more households go ahead with work - 23% currently drop out because they have to pay a contribution.
- It treats housing association tenants the same way as other social housing tenants who are less likely to be means-tested and gets rid of the post-code lottery due to some authorities removing the means test in their local Housing Assistance policy while others still apply it.

Advantages for the landlord:

- Some will welcome the opportunity to take more control over the process.
- The 'contract' for completion of works is with the landlord and contractor (rather than tenant) so that they can control who completes works in their properties. It makes it easier if things go wrong either during or after works have been completed.
- Landlords will find it easier to top up the grant to get better designs.
- Landlords can do their own CRM compliance.

Advantages for the local authority:

- It makes it easier to resolve problems with the application process as there would be a named housing association contact on every form.
- It speeds up the process of dealing with paperwork and reduces delays.
- Authorities can reclaim specialised equipment when no longer needed, such as stairlifts.
- Local authorities can retain nomination rights for a period of five years to make sure DFG investment is protected and adapted properties are relet to other disabled people.
- Agreement about future maintenance could become part of the contract.
- If more associations took over project management, it would reduce the workload allowing authorities to focus on owner occupiers and private tenants who otherwise have little support
- Local authorities retain control of the funding to meet their statutory duties.

A single, national DFG landlord application form is needed across England to give consistency for housing associations working across local authority boundaries. An example is in Appendix A.

Disadvantages of landlord applications

Disadvantages for tenants:

• Tenants have less support if an application was refused by the landlord, or they did not agree with the adaptation work proposed - see section on refusal of consent below.

Disadvantages for the landlord:

• Although many associations will welcome the chance to have more control by managing adaptation work themselves it will require more staff resources and the right contractors –many will still prefer the local authority to manage the work.

Disadvantages for the local authority:

- There would be an impact on DFG spending in some areas if the means test was removed. As contributions are often quite small, in most areas removing the means test might not add much to overall costs.
- There would be a loss of local authority agency fee if associations take over project management.
- If housing associations take over more of the process, they will need to provide output and outcome data for DFG cases so authorities can show they are meeting their statutory duty and can make the annual DELTA return to DLUHC.

To overcome any disadvantages as a result of using landlord applications there needs to be:

Tenants - an easy to find advocacy and complaints service so they know where to go if they disagree with decisions or if there are

problems with the process.⁹⁵

Local authorities/housing associations – good communication about the change in the application process.

Government - a new allocation formula

based on local need and housing association use of the DFG to redistribute funding to authorities with higher need and more limited resources.

The Regulator - more oversight of home adaptation services to ensure that tenants' rights are upheld.

Top-slicing the DFG budget

As was discussed in the last chapter, local authorities could decide to apportion a certain amount of the DFG budget to a housing association if they thought this would provide a quicker and more effective service to tenants. Cornwall is an example of this happening in practice (Chapter 6).

There are considerable advantages for tenants if their landlord can get on with adaptations without handovers and lots of paperwork. For the landlord it puts adaptations on the operational agenda, means they can control the contractors and what goes into their properties, and ensure that asset management databases are kept up to date. They can more easily add resources to improve adaptation design.

95 As part of the Social Housing Charter a Social Housing Complaints 'Make Things Right' web portal has been established: <https://socialhousingcomplaints.campaign.gov.uk>.

Top-slicing arrangements would have to be monitored and outcomes measured for the local authority to be able to maintain their statutory responsibilities. They will also need output data to make sure that they can complete the annual DELTA data return to DLUHC.

Whatever system is used for funding, if landlords have control of adaptations delivery they need effective and adequately resourced services. Tenants also need easy to find advocacy and complaints services to ensure their rights are protected if the process goes wrong.

Refusal of consent by the landlord

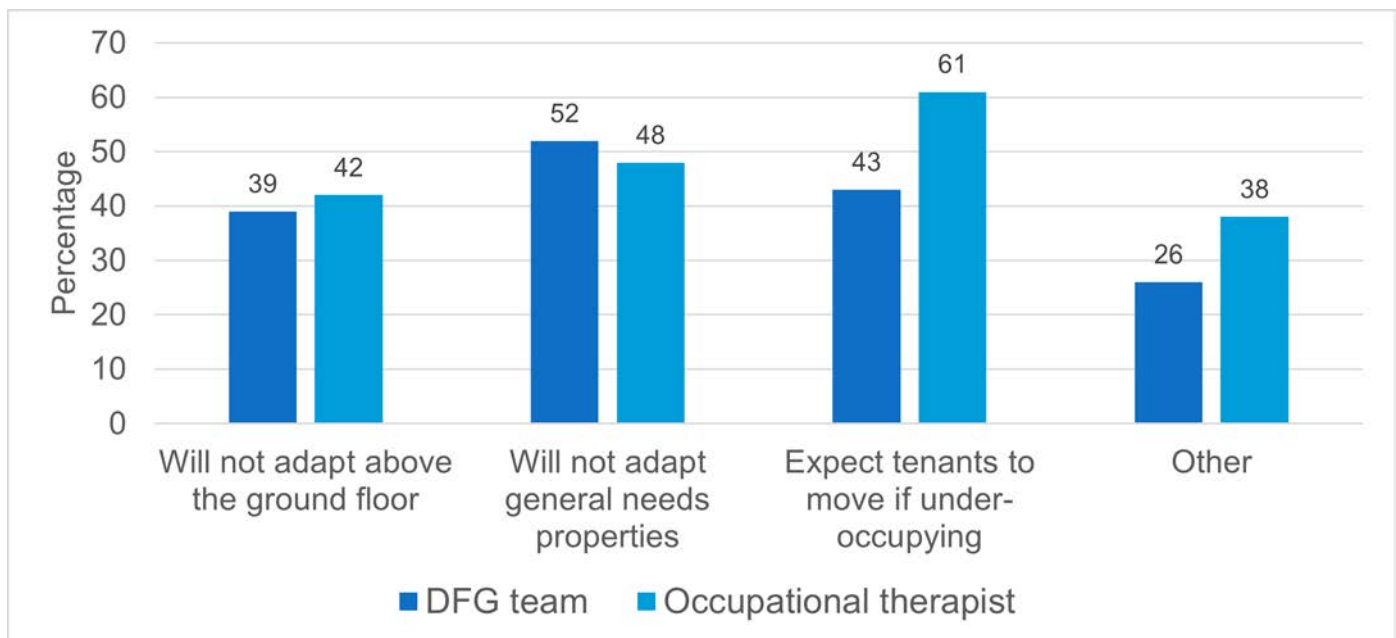
Most DFGs are approved but it was clear from the various surveys and interviews that associations sometimes refuse permission for adaptations. More than 80% of OTs and DFG

teams said it happened occasionally (87% of OTs and 83% of DFG teams). In addition, a quarter of OTs said that they sometimes did not pass cases on to their DFG team because they already knew the housing association would not approve it.

The main reasons are shown in Figure 7.3 and discussed further below:

Refusal to adapt general needs properties
A few associations appear to have a blanket ban on adapting general needs homes which goes against the Equality Act 2010 and the need to make 'reasonable adjustments'. Some of these homes may be difficult to adapt, but it is of great concern that ramps, stairlifts, showers and other adaptations are not being allowed. It is not a policy designed to promote wellbeing and independence.

Figure 7.3 DFG teams and OT views of the main reasons housing associations refuse adaptations



Source: online survey of OTs and DFG teams. Note: more than one option allowed.

Refusal to adapt general needs or above ground floor - problems with water leakage

There are baths installed in most social housing properties to minimise the chance of leaks. The most common adaptation carried out using the DFG is the replacement of baths with showers. The main reason why adaptations are not allowed above the ground floor or in general needs properties may be because of potential water leakage.

Water damage is the biggest single concern for building insurers and premiums have increased considerably in recent years.⁹⁶ This also drives decisions to remove showers at change of tenancy and replace them with baths.

However, the most common adaptation carried out using the DFG is the replacement of baths with showers. These are the adaptations most likely to be refused. Even if a shower is installed for an older tenant, it may be removed at change of tenancy because of concern that it may fail with the heavier use of a family.

Solutions are required if the general stock is to become accessible to more people and can flex to meet changing needs through the life course. Those solutions might include:

- More robust shower designs to minimise water leakage.
- Better management and supervision of contractors to ensure fewer installation faults.
- Putting a shower tray under the bath so that

a bath can be installed for a family but easily removed to create a shower cubicle when needs change.

- Use of reusable, sealed shower pods which are quick to install and remove.
- More aspirational designs as medical-looking showers make properties hard to relet.

Encouraging tenants to move

The other main reason for refusing an adaptation is because of pressures on the limited housing stock. Single people, couples and small families in larger homes are often expected to move because it will free a family home for someone on the waiting list. This may provide a much better solution, particularly where associations have a lot of well-adapted, accessible and specialised homes in the right locations. However, in some areas there are no suitable options and many tenants do not want to move. In addition, some tenants get little help to find alternative accommodation.

As waiting list pressures have increased this reason for refusing adaptations appears to have become more common, although it is hard to pin down exact figures. OTs seemed to be more aware that people are being asked to move than DFG teams as the problems appear at the assessment stage (Figure 2.7). These cases may not get referred on for a DFG.

The figures obtained for this report only show cases where a tenant has had contact with an OT or applied for a DFG. We have no idea

96 <https://www.pbctoday.co.uk/news/building-control-news/escape-of-water-claims/81378/>

how many tenants never get in touch with the local authority because a landlord has already told them they will have to move.

There are some concerns about these ‘best use of stock’ policies in relation to disabled and older tenants. Under the Equality Act 2010 landlords must make ‘reasonable adjustments’, and the ‘Islington judgement’ clarified that under the DFG legislation tenants must not be treated differently from owners in relation to decisions about adapting the home or moving. The following chapter looks in more detail at the difficulties facing disabled people in trying to find a suitable alternative home.

Use of contractors for home adaptations

A further issue affecting the delivery of home adaptations is the lack of reliable contractors. This was a key problem identified by the Equality and Human Rights Commission in their interviews with local authorities about home adaptations.⁹⁷

The construction industry workforce is ageing rapidly and there is national shortage of skilled contractors and tradespeople, made even more acute with the loss of migrant workers since the UK’s exit from the European Union.⁹⁸

Interviews with housing association staff revealed several problems in getting adaptation

97 Adams, L. et al. (2018) Housing and disabled people: the role of local authorities, London: Equality and Human Rights Commission.

98 The Chartered Institute of Building (2015) The impact of the ageing population on the construction industry, London: CIOB.

work completed:

- In-house contractors are often at capacity and unable to do adaptation work.
- It is hard to manage contractors and get a consistent standard of work especially when stock is scattered over a wide area.
- Finding contractors with the right skills is often difficult - many use sub-contractors for adaptation work which present challenges in terms of quality control, customer communication, and confusion over who is responsible for the work.

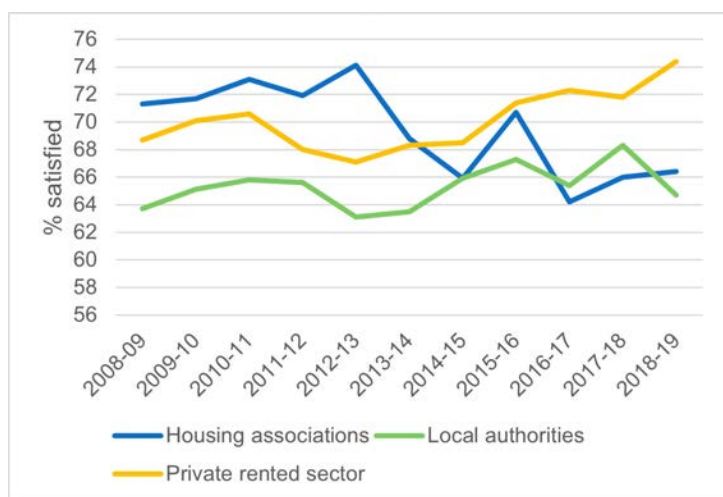
The English Housing survey shows a fall in residents’ satisfaction with repairs over the last decade in the housing association sector (Figure 7.4). Similar problems may be affecting home adaptation work.

Mergers can sometimes make the management of home adaptations even more difficult as the adaptation service gets forgotten. One housing association officer interviewed for this project said that following the merger of two associations, the contract for the repair and maintenance service was changed. It did not include anything about who would carry out home adaptations. It took six months to make sure that adaptations were included in the contract, a delay that led to a backlog of cases.

If housing associations are to take over more of the management of home adaptations,

there needs to be a real focus on ensuring the right contractors are appointed, that they have the training to carry out specialised work, the process is managed effectively, and the outcomes monitored.

Figure 7.4 Satisfaction with repairs



Source: English Housing Survey 2019-20.

Working together to improve the construction industry

There are several ways in which local authorities and housing associations could work in partnership to make improvements in the use of contractors:

- Framework agreements set up by local authorities and housing associations often make it hard for smaller contractors to join, yet local contractors and tradespeople are especially suited to small scale retrofitting work. Dynamic purchasing systems open to new entrants over the lifetime of an agreement might provide a route into frameworks for

smaller firms.⁹⁹

- Value for money should not drive a ‘race to the bottom’ in terms of costs. It is important to ensure the on-going viability of good construction firms by paying realistic prices, especially when firms are struggling with supply chain issues and rising prices.
- Local authorities and housing associations could work with local schools and training colleges to encourage young people into the sector and provide apprenticeships.
- Trusted assessor training for contractors would help them have greater understanding of the needs of disabled and older clients and lead to better work.
- Manufacturers of accessible housing products could play a bigger role in providing training in installation techniques.
- Trustmark (the only government approved quality scheme) could be used more actively to endorse good construction firms.

On-going maintenance, servicing and repair

Specialist equipment such as stairlifts, through-floor-lifts, automated wash/dry toilets and hoists are routinely installed through Disabled Facilities Grants. All these items require regular servicing and maintenance to remain working effectively and safely, and to ensure that people can continue with activities of daily living and retain their dignity and independence.

Some local authorities include an extended warranty period in the cost of purchase and

99 Foundations (2020) Round Table 1: Procuring adaptations.

installation and capitalise this, whilst others only provide the ‘standard’ 12–24-month manufacturer’s warranty. Some have a contract with specific supplier to provide on-going maintenance. In other cases the equipment is on loan rather than being purchased as part of the grant. This causes confusion for associations dealing with different service provision in multiple local authority areas.

Housing Associations take very different approaches to warranties with some including them within their provision as a landlord free of charge, others take on responsibility but place an additional service charge, while others transfer liability wholly to the tenant. Tenants do not always know what has been agreed.

Once any DFG funded warranty expires, responsibility for upkeep and maintenance needs to be made clear. Passing on costs to the tenant should be avoided if possible as Section 20 of the guidance for Universal Credit specifically excludes warranties on the *“installation, maintenance or repair of any special equipment or adaptations to the tenant’s accommodation, in respect of disability or infirmity of tenants”*.

There needs to be more consistency in the approach by both housing associations and local authorities. Ideally extended warranties should be capitalised and included in the DFG. More partnership agreements are needed about maintenance and repair. If costs

are passed on to tenants, landlords need to ensure that tenants know exactly what they are expected to pay for.

Delegating maintenance to third parties does not remove the landlord’s responsibility to make sure equipment such as lifts and hoists installed in the home are safe.¹⁰⁰ The Health and Safety Executive advises that lifts should be inspected every six months.

Flagship Group – providing an effective maintenance service

Flagship handles the organisation and payment of the servicing and maintenance of adaptations once local authority warranties and service plans end, with no additional cost to tenants. This is managed by a member of staff in the asset management team.

There is also a small budget to cover the costs of replacement if equipment breaks down. This ensures that tenants never get left without a stairlift or other piece of equipment essential for their safety, mobility and wellbeing. There is no need for the tenant to apply and wait for another DFG.

The need for more recycling

Just over half of local authorities responding to the online survey said they have recycling schemes for stairlifts, ramps or other

100 <https://www.hsmsearch.com/Double-prosecution-following-death-of-child>.

equipment. A few associations have developed their own recycling systems for stairlifts, either individually or in partnership with a local authority.

Where recycling occurs, it enables straight stairlifts to be installed very quickly, often for less than £1,000 (the common upper limit for minor works). Modular ramps can also be removed and recycled when no longer needed. There will also be an increasing need to store and recycle baths as more landlords are installing shower trays underneath baths to allow bathrooms to be adapted quickly. Modular units such as shower pods may also need recycling.

Housing associations often have difficulties in storing and refurbishing equipment. This is where better procurement and more partnership working with local authorities would help. Landlord applications could include arrangements for returning equipment when no longer needed.

Recycling is becoming ever more important as we try to move toward a greener and more circular economy. Every local authority or housing partnership needs an effective recycling and refurbishment centre for equipment.

The impact of void policies

There is evidence from the surveys and in-depth interviews conducted for this project that

housing association void teams sometimes remove adaptations to make properties easier to let. Void performance is subject to strict targets to maximise return from rents and meet the high demand for homes, with turnaround times in the sector averaging 15 days.¹⁰¹

It is reasonable to remove an adaptation when a tenancy changes if it is outdated, unsafe, highly customised (making it unsuitable for another tenant), or subject to constant call-out for repair. If a home just has a few ugly, low-cost grab rails these can also be removed.

However, local authorities are aware of some associations having a standard practice of removing through floor lifts, stairlifts and hoists funded through DFG because it takes too long to find someone who might need the adaptations. Level access showers may be replaced with baths on upper floors to minimise risk of water damage. These practices not only have significant financial implications they also have environmental consequences, and they reduce the overall accessibility of the housing association stock.

Standard void times for adapted properties

In the online survey of housing associations most said adapted homes were treated as standard voids (Table 7.1). Only a fifth said they would leave the property vacant for longer to match it to a person that needed it. Others would only do so if the property was fully

101 Regulator of Social Housing (Oct 2019) Private registered provider social housing stock in England – sector characteristics and stock movement 2018-2019. London: National Statistics Office.

wheelchair accessible or highly adapted.

Table 7.1 What is your standard practice when an adapted property becomes vacant?

	%
Leave vacant for longer and try to match property to person who needs it	21
Only try to match if property fully wheelchair accessible or highly adapted	11
Property is dealt with as a standard void, but adaptations listed on the details	42
Other/don't know	26
Total	100

Source: Housing association online survey

The preoccupation with void targets and the removal of adaptations reduces the supply of adapted homes and makes it harder to match disabled people to appropriate properties. It is a substantial loss of DFG investment. It can also result in perverse decisions that have serious financial consequences and a detrimental effect on tenants (see box).

The impact of the focus on void times

In one association adaptations were taken out to relet a property quickly that was two doors away from someone who needed those adaptations. It meant that an already adapted home became a general needs home let to a non-disabled person, while the

older neighbour had to wait for adaptations and then undergo the upheaval of building work.

It illustrates the difficulties caused by different services operating in unconnected silos and the waste of resources when the focus is solely on rents and assets. It has a major impact on tenants and greatly increases the costs for other organisations. In this case void costs could have been kept to a minimum if there was a good matching service and some support to move.

Cost implications

Investment lost by removal of shower in first home	£5,000 - 6,000 (DFG)
Reinstatement of the bathroom in the first home	£1,500 - £1,800 (HA)
Installation of bathroom in neighbouring home	£5,000 - £6,000 (DFG)
Respite care needed during the work	£600 - £800 per week (Social Care)

In contrast, a survey respondent from a major national association was working with her management team to actively try to prevent voids teams removing lifts and hoists. Adapted properties are to be more clearly identified on the property database and used to move people who are currently in unsuitable homes.

Some associations use the opportunity provided by vacant possession to refurbish and upgrade properties that are suitable for older and disabled tenants by getting rid of raised thresholds or putting in showers and making them more accessible. It should become more common practice rather than the DFG being used to provide ad hoc adaptations.

Loss of investment

Although the number of DFG adaptations in the housing association sector have increased steadily over the past decade, the tendency to remove adaptations may be why the English Housing Survey reports that housing association homes with adaptations have declined from 21% to 18% in the period from 2009-2018.¹⁰²

There has been a corresponding increase in council homes with adaptations over the same period. Council landlords may be less likely to remove adaptations, perhaps because these are funded directly from their own housing revenue accounts. Adaptations installed using a DFG have not cost most associations anything so there is no financial penalty in removing them.

This indicates that associations should play a more active role in funding adaptations so that there is a more strategic approach. Rather than removing adaptations they should allow time to match people to properties. Where local authorities are aware that adaptations are

¹⁰² <https://www.gov.uk/government/statistics/english-housing-survey-2018-accessibility-of-english-homes-fact-sheet>.

frequently being removed, they could make use of the nomination rights that come with landlord applications to protect DFG investment and make sure that the property is relet to another disabled person.

More attractive and inclusive home adaptation design could also significantly reduce the removal of adaptations and make properties much easier to relet. Attractive adaptations can be provided at similar costs to those are medical looking. This is covered in the online Design Guide <https://www-foundations.uk.com/design/>.

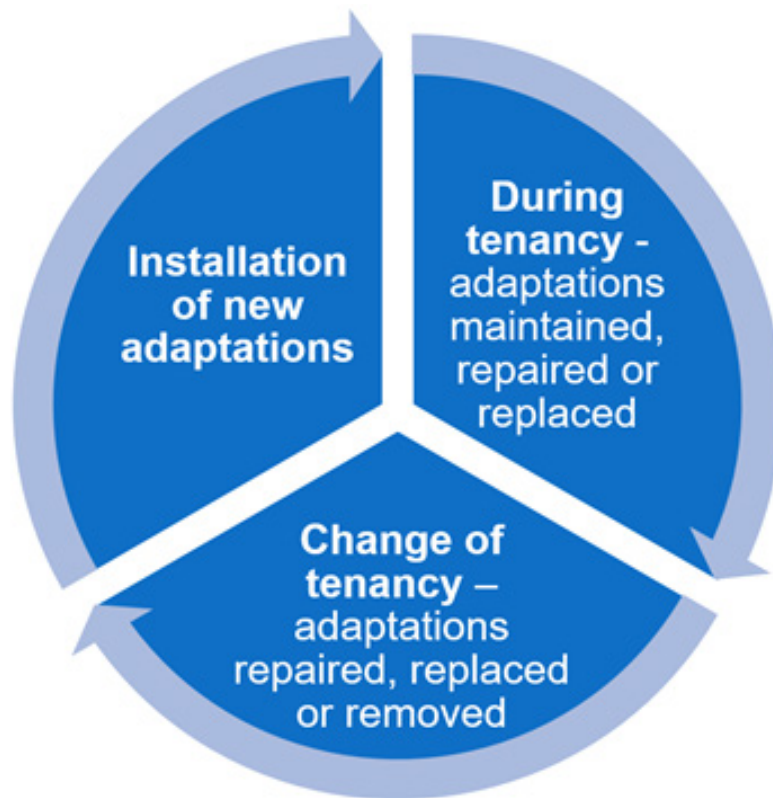
Recording property information

It was clear from the survey and in-depth interviews that asset management databases were not always kept up to date. There are three key points to record information: when adaptations are first completed; when they are repaired; or if they are removed or replaced (Figure 7.5).

Accurate information is vital:

- To make sure warranties are up to date and servicing and maintenance takes place.
- To ensure that equipment that is still needed is replaced at the end of its lifespan.
- To ensure that the right information is put on home choice systems.
- To feed into strategies about best use of stock and investment in new accessible homes

Figure 7.5 Recording changes to adaptations on property registers



Most local authorities responding to our survey said that they simply let the housing associations know that work had been completed and it was up to the association to put the information on their database.

Housing association survey respondents were asked if adapted properties are clearly identified within the asset management database and if this is linked to the property allocation system. Over half (58%) said 'yes' they were clearly identified, but 26% said 'no' and 16% were 'not sure'.

Some clearly had a good database. The manager of an independent living team in a small LSVT said that,

“ Having adapted a number of our properties to suit the needs of specific

customers, we need to make best use of these when they become available for re-letting. We have captured information on adapted stock as part of our Asset Register which can be used to help match properties with customers in need of an accessible home.”

Interview respondent

Others were dealing with incomplete records. This is likely to be common as most associations have merged with others, not all of which will have had good records.

“ One of the biggest challenges is old cases, lots of HIA and LA's don't let us know when works are complete. Customers ring us to fix their stairlift and we didn't know it existed (done years before).”

Survey respondent.

Some associations were trying to remedy the problems; an approach that could be used by others:

“The previous people in the A&A post did not keep good records about what homes have been adapted. When the housing team does home visits they now look for adaptations – particularly equipment such as SLs [stairlifts], hoists etc. This is important to make sure warranties are up to date – they can’t do annual inspections if they don’t know where everything is.”

Survey respondent from a regional association.

Incomplete information on adapted and accessible properties is a major hinderance to the allocation of housing for older and disabled people which was picked up in the research and consultation for the Social Housing White Paper.¹⁰³ There needs to be a systematic way of bringing databases up to date and providing the right information to potential housing applicants.

A more effective home adaptation process

This chapter started by showing a diagram of the often complicated process to get home adaptations completed for housing association tenants. There are unnecessary handovers,

inconsistencies in approach, frequent delays and lack of recording of asset management information. It is hoped that this chapter will have raised a lot of questions for housing associations and local authorities about how they run services. Although local partnerships can overcome some of the problems, the many associations that work across boundaries need a new approach.

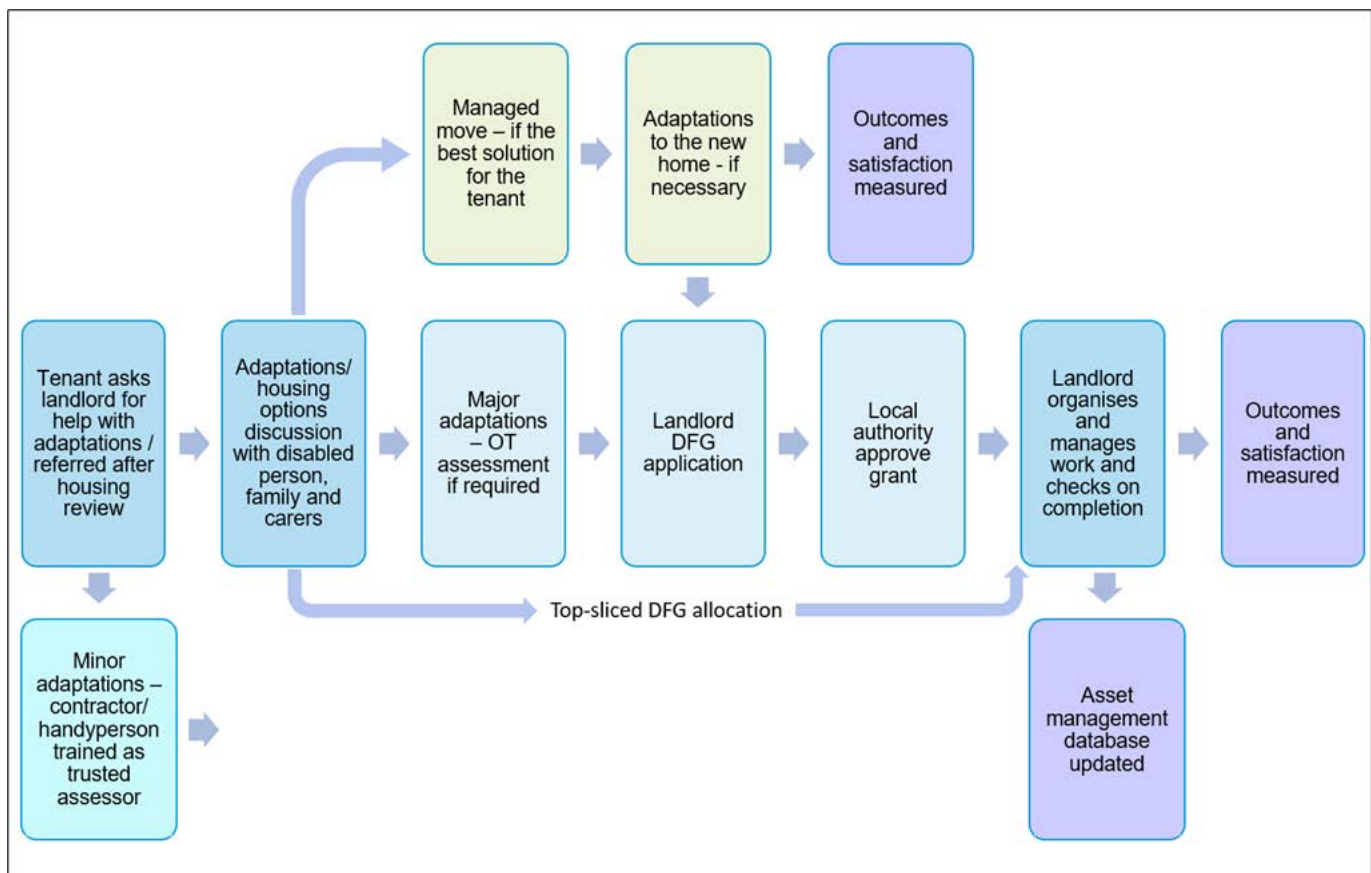
Landlord applications would result in a simpler customer pathway as the tenant would turn to their landlord for help not the local authority. Top slicing the grant allocation would make the process even more straightforward for both housing associations and tenants. However, to take more control and responsibility will require each association to have a well-resourced, properly trained and effective home adaptations service.

Figure 7.6 shows a leaner and simpler home adaptations pathway, with a single point of contact for tenants, better measurement of outcomes, and greater certainty that changes to the home are recorded on asset management databases.

Two examples of housing associations with effective adaptation services are included at the end of this chapter, one is an LSVT still largely confined to its original location, the other is a regional association. The next chapter looks at the moving process, and how that could work better using improved housing reviews and the idea of ‘Managed Moves’.

¹⁰³ Ministry of Housing Communities and Local Government (2020) The Charter for Social Housing Residents: Social Housing White Paper, Section 135.

Figure 7.6 A more effective, tenant-centred home adaptation process



Making home adaptations delivery work effectively - examples

WDH in Wakefield shows how effectively adaptations can be delivered with sufficient resources and a committed management team. Home adaptations are fully integrated to ensure people receive the right mix of services, including being helped to move if this is better solution. They also measure outcomes to determine the impact on people's health and wellbeing.

An integrated home adaptation programme - Wakefield

WDH is a stock transfer association that owns and manages 32,000 properties. They invest heavily in adaptations and wellbeing with

approximately 48% of residents having health related vulnerabilities.

Adaptations agreement - in place since stock transferred in 2005.

Dedicated annual budget of £1m.

Adaptations team: three administrative assistants, one technical officer, one trusted assessor and five OTs seconded from the NHS.

Adaptations up to £1,000 - customers can self-assess and order minor works items and equipment like handrails, grabrails and bath boards over the telephone. Tradesperson trained as a Trusted Assessor to assess and fit minor adaptations in one go - really appreciated by customers. 2019/20 1586 cases (93% of all cases)

Major adaptations - WDH do all work up to

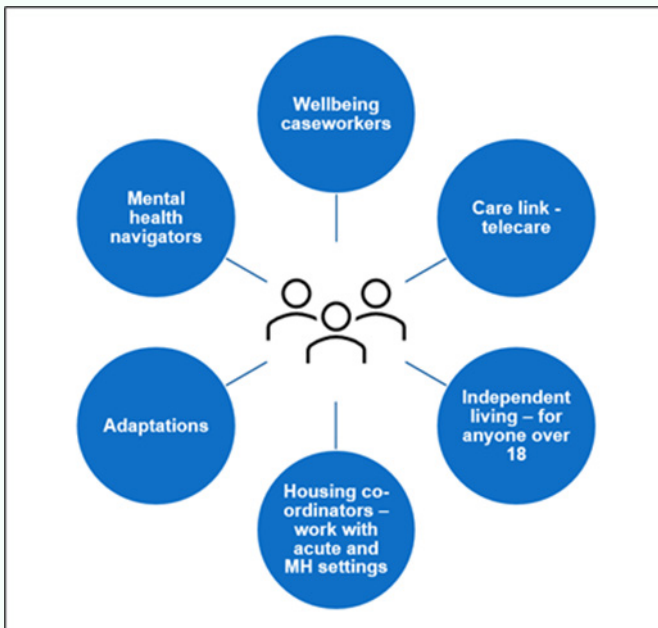
£25,000 which is carried out by the in-house Technical Services team. 2019/20 111 cases (7% of all cases)

Timescales 2019/20 (prior to Covid-19):

- OT assessments - 16 days on average (KPI 28 days)
- Health and Medical Rehousing Assessments – 16 days on average (KPI 26 days)
- Tradesperson/TA - 18 days on average (KPI 21 days).

Moving v adapting - if adaptations are not possible, or someone is not in a suitable property, the OTs at WDH will look for alternative housing and do accompanied viewings.

Home adaptations are part of an integrated service for residents:



Outcomes 2019/20: The team at WDH use the Therapy Outcome Measure (TOM) to gauge customer satisfaction and personal progress. Outcomes realised:

- 4% improvement in level of impairment.
- 30% increase in personal activity levels.

- 18% increase in participation in services (because they can get in and out of property).
- 30% increase in customer wellbeing.
- 99% level of satisfaction with the service
- Social return on investment – **for every £1 spent they get £5.26 back** in benefits.

Plans for the future:

- Mobile working platform for the OTs.
- Rationalisation of health, social care and housing OTs to prevent duplication so that customers have single OT to take care of everything.
- Better new-build standards from developers to reduce the need for adaptations.
- As they expand to LAs beyond the Wakefield boundary WDH give a commitment that they will deliver the same consistent service / approach to financing adaptations and doing the installations. The only difference is that the LA OTs do the assessments.

Reasons for success: Senior management fully engaged in developing integrated services, and a committed Adaptations and Wellbeing Manager.

The Longhurst Group works in partnership with a number of local authorities to provide a more proactive and preventative approach to home adaptations. A programme of home safety checks, a significant increase in the minor works budget, and more staff trained as trusted assessors has resulted in a reduction the number of cases being referred to the DFG and a much quicker response time for tenants.

Longhurst Group – partnership working for fast delivery of adaptations

Longhurst Group is a charitable housing association which owns and manages over 23,500 homes in 50 local authority areas across the Midlands and the East of England.

Home safety check service

In 2017 they began a home safety check pilot for Rutland County Council that has now become an established service operating across all tenures. They complete home visits and person-centred assessments which includes providing advice and information, identifying the need for equipment and adaptations, and signposting to other statutory or voluntary services to support individuals to live safe and well at home. The initial contract was for 200 referrals per year, but they consistently complete more than 300.

Rutland County Council allows access to the Integrated Community Equipment Service and has developed a non-means tested Health and Prevention Grant (HaP). This is a discretionary grant to support Health, Wellbeing and Prevention priorities.

The aim of the grant is to say 'yes' and provide necessary and appropriate adaptations efficiently to reduce identified risks. This grant is not financially assessed but is based on a Therapy or Trusted Assessor assessment and recommendation.

The aim is to promote independence, facilitate discharge from hospital, reduce expensive packages for care or make a carer's role more sustainable. All works must be considered reasonable and practicable. The grant can be used to undertake work and/or purchase equipment.

For work significantly exceeding £5,000, staff are able to complete a preliminary means test to determine eligibility for a Disabled Facilities Grant before passing cases to the Occupational Therapists in the local authority. Longhurst Group also delivers a tenure neutral assistive technology service in Rutland on behalf of Rutland County Council.

Improving Lives Strategy

Longhurst Group has now integrated this approach into their newly formed Independent Living Service offering assistance to all customers to support independence and wellbeing within the home as part of its 'Improving Lives Strategy'. Since April 2021 the service has:

- An increased minor works budget with a threshold of £2,500 per adaptation.
- A team of Independent Living Assessors (ILA) all trained as trusted assessors (levels 3-4) to do home visits across all regions. There is currently a manager and three ILAs, with a further ILA to be appointed to complete the team.
- An Aids and Adaptations Project Manager in the Asset Management Team provides technical support and oversees the contractors.

Initial results:

Referrals come predominantly from their own housing teams and adult social care:

- 77% are people aged 55 and over, 11% are families with children
- There is much better communication with customers
- There is a quick response time – they aim to do a home visit within 10 days of referral and manage this in 87% of cases currently.
- Fewer cases referred for a DFG – initial results in their southern region show that 21% of cases used to need a DFG which is now down to 13-14%.

Lessons for places developing similar services

- Transparency about aims, budgets and outcomes.
- Piloting new services is essential
- Need to develop a rapport with social service teams and gain acceptance for trusted assessors to do the less complex assessment work.

SUMMARY: IMPROVING THE DELIVERY PROCESS

- **The disabled person, their family and carers need to be at the heart of decisions** but complex customer pathways with numerous handovers make this difficult.
- **Around 20% of associations have no lead officer for adaptations** - and 13% no policy.
- **Websites** - information about home adaptations not always easy to find.
- **Customer service staff** – it is important that the right routing for home adaptation cases is embedded in automated systems and included as part of training.
- **Aids and adaptations teams are very small** - often a single person.
- **Services are often fragile** - because of dependency on a single individual.
- **Few specialised staff** - only 10% employ an OT and only 25% have trusted assessors.
- **Local authority DFG services** – some teams are integrated but many still have OTs and DFG staff based in different departments and some services have long waiting times.
- **Inappropriate cases are being sent to local authority OTs** - causing delays for tenants and adding to waiting times for applicants from other tenures.
- **An OT assessment is not needed for minor adaptations**, or some major work – whether to use an OT should be based on the complexity of the case (see Adaptations Without Delay).
- **In-house trusted assessors** - can manage less complex cases.
- **Delays in getting landlords' consent for work** – reported by 60% of local authorities.
- **Communication needs to be improved** - some housing associations are hard to reach.
- **Landlord (rather than tenant) DFG applications** – would speed the approval process and improve communication as there would be a named officer on the paperwork.
- **Local authorities could top-slice the DFG budget** to specific housing associations to give them more control over the process.
- **Properly resourced adaptation services required** - if landlords are to take more control.
- **Advocacy and complaints services** - to ensure tenants' rights are protected. 'Make Things Right' web service has been established <https://socialhousingcomplaints.campaign.gov.uk>.
- **Adaptations are sometimes refused** – mostly due to unwillingness to adapt general needs homes, reluctance to put adaptations into upper floors, or because a tenant needs to move.
- **Replacement of baths with showers** - most common adaptation using the DFG.
- **Water damage** - biggest single concern for building insurers and premiums have increased.
- **To prevent leaks** - requires more robust shower designs, more oversight of construction

process, or easy to convert bathrooms with shower trays in the bath footprint.

- **Shortage of good, reliable contractors** – requires local authorities and housing associations to work together to improve procurement, avoid a ‘race to the bottom’ over prices, and provide better training.
- **Maintenance, servicing, and repair is delivered in an inconsistent way** – local authorities could capitalise more extended warranties under the DFG. Passing on costs to tenants should be avoided if possible as it is not covered by universal credit. If tenants must take on on-going maintenance this needs to be made very clear.
- **Void times for adapted homes need to be extended** - at change of tenancy most adapted homes are treated as standard voids meaning many adaptations are removed (a substantial loss of DFG investment). It reduces the supply of adapted homes and makes it much harder to match disabled people to appropriate properties.
- **Incomplete record of adaptations on asset management databases** – handovers between organisations make it hard to keep records up to date. This needs to improve to provide better information on home choice systems and help disabled people find homes.
- **Recycling** – only about half of local authorities have recycling schemes for equipment and adaptations. Recycling stairlifts and other equipment reduces costs and cuts installation times. More recycling services are also needed as we move towards a greener economy.
- **A simpler home adaptations pathway is needed** - with better measurement of outcomes.
-

RECOMMENDATIONS – HOME ADAPTATIONS DELIVERY

HOUSING ASSOCIATIONS

- Ensure home adaptations staffing levels are sufficient to meet need and always have a named officer to lead on adaptation cases.
- Improve home adaptation information on asset management databases.

8. MOVING RATHER THAN ADAPTING

8. Moving rather adapting

There are times when a move is the only solution if the home will not meet needs, or the adaptation work is not reasonable or practicable due to the nature or condition of the property.

Limited choice of alternative housing

Most housing association tenants are in general needs properties. In some areas people will have options to move, but in others choice may be more limited. For younger disabled people the choice is often very restricted.

New accessible homes are not being built in anything like the right numbers because the accessible, adaptable design standard (set out in Building Regulations M4 Category 2 and 3) are optional rather than being a mandatory

baseline for new homes. Outside London only 1.5% of all homes planned over the next decade will be wheelchair accessible.¹⁰⁴ As we saw in Chapter 3 housing associations have more accessible homes than other tenures, but only 20% of the stock has all four of the main accessibility features (flush threshold, level access to main entrance, WC at entrance level, and wider doorways/ circulation space).

For older people one option is to move into specialised housing. However, this only makes up 15% of the sector's stock, and is either held by small providers with less than 1,000 units (43% of supported housing) or by a small number of large providers.¹⁰⁵ Many associations have little specialist housing or have older sheltered units with awkward layouts that are difficult to upgrade or adapt.

New supported units built per year are significantly lower than the peak achieved

104 Habinteg (2021) Forecast for Accessible Homes 2020.

105 Park, J. and Porteus, J. (2018) Age-friendly housing, London: RIBA.

in the 1970 and 1980s, and completions fell by 4% over the decade 2009-2018.¹⁰⁶ A government inquiry into housing for older people in 2018 concluded that “*options for older social tenants who wish to move are limited*”.¹⁰⁷ In any case, not everyone wants to move to a retirement community preferring to stay in the neighbourhood they know, surrounded by people of all ages.

The 2021 Social Care White Paper announced additional funding for more supported housing but at the time of writing there were few further details.

Unwillingness to move

Many disabled and older would welcome the chance to get a more suitable home that is easier to manage but the lack of choice of the right type of homes in the right areas makes people much more reluctant to move. Homes are not just bricks and mortar, but places infused with personality and memories, where grown-up children return, a neighbourhood people know well, and where they have a network of friends, support, and services.¹⁰⁸

The English Housing Survey 2019-20 showed that only 13% of housing association tenants requiring adaptations said they wanted to move; more than owners (6%), but less than those in the private rented sector (20%).

Younger people aged under 55 are more willing to move to more suitable accommodation than those who are older, with those over 75 the least willing to move (Table 8.1). However, for all ages the desire to move is higher for those who are in unsuitable accommodation that lacks adaptations. A third (33%) of those households wanted to move compared to only 3% of those who had adaptations and were in suitable accommodation.

Table 8.1 Requiring adaptations and wanting to move (all tenures) 2019-20

	Want to move
Housing situation	
Lack adaptations	13%
Require adaptations and in unsuitable housing	33%
Age	
Under 55	17%
55 to 64	12%
65 to 74	7%
75 or over	4%

Source: English Housing Survey: Home adaptations report 2019-20

Pressures on landlords

The huge pressures on landlords due to the length of waiting lists for homes means that they sometimes refuse adaptations in preference to people moving, as has been shown in the previous chapter. This is most

106 Park, J. and Porteus, J. (2018) Age-friendly housing, London: RIBA.

107 Ministry of Housing, Communities and Local Government (2016a) English housing survey 2014-2015: Adaptations and accessibility of homes report.

108 Cooper Marcus, C. (1997) House as a mirror of self: exploring the deeper meaning of home, Berkeley: Conari Press.

likely to occur:

- Where there is a single person or couple occupying a family home.
- Where there is a policy to only adapt homes designed for older and disabled people.
- Where adaptations are required above the ground floor.
- Where work is required to a communal area.
- Where the work is complex or will cost more than the upper limit of the DFG.

Many operate formal or informal ‘best use of stock’ policies to try to free up homes for people on the waiting list. It can become very difficult for adaptations staff to make decisions when there is so much pressure on the limited stock of homes. As one housing association adaptations officer said, *“I have a landlord head and a disabled adaptations head”*.

However, the Equality Act 2010 states that a landlord is obliged to make ‘reasonable adjustments’ and, as was explained in Chapter 2, the Equality and Human Rights Commission points out that people cannot be refused adaptations without good reason. Social housing landlords also need to be mindful of the 2020 High Court Ruling ‘McKeown vs Islington’ that it is not lawful to refuse a DFG on the grounds that the person must move but that a DFG application must be treated on the same basis as an application by an owner occupier.¹⁰⁹

109 McKeown, R (On the Application Of) v London Borough of Islington [2020] EWHC 779. <https://www.bailii.org/ew/cases/EWHC/Admin/2020/779.html>.

110 Bianco et al. (2020) I think I could have designed it better, but I didn’t think it was my place: a critical review of home modification practices from the perspectives of health and design, Disability and Rehabilitation: Assistive Technology, DOI: 10.1080/17483107.2020.1749896.

111 Morgan, D., Boniface, G. and Reagon, C. (2016) The effects of adapting their home on the meaning of home for families with a disabled child, Disability & Society, 31:4, 481-496, DOI: 10.1080/09687599.2016.1183475.

Pressures on tenants

Disabled and older tenants are not always aware of their rights and tend to defer to professionals, even when what is proposed is not what they want.¹¹⁰ Those who are vulnerable, have communication problems, are less articulate, in poor health, have mental health issues or depression may find it very difficult to argue against a decision made by their landlord.

A study of families with disabled children shows that people can feel pressurised into moving even if there is a long wait for a new home.

“The lack of choice and control was particularly evident in the narratives of families who required an adaptation on a rental property. Families in this position reported being offered alternative accommodation rather than the opportunity to adapt their current home. However, the lack of suitably adapted properties meant that families were being left in unadapted homes due to the lack of viable alternatives.”¹¹¹

A major concern is that fear of being asked to move may prevent some people coming forward to get help with adaptations. All too often the need for changes to the home only

becomes known when someone has had a fall or a stay in hospital. At this point moving home would be particularly disruptive and difficult to cope with. It is particularly hard for people to move if they have conditions like sight loss or dementia where their independence is based on their memory of a familiar environment.

Making decisions earlier

To ensure people remain active and independent for longer housing associations could do much more to identify people's needs earlier before they get to a crisis point. Having discussions as part of housing reviews at an earlier stage in their tenancy means that they can weigh up the options and are more able to cope with the upheaval of either adaptations or moving (see box). Many of those who move often wished they had done so sooner.

Using routine housing reviews to discuss options for adaptations or moving home

A Centre for Ageing Better study interviewed social housing tenants in Leeds who suggested that planning for housing needs could be done as part of routine housing reviews.¹¹²

- It would improve people's knowledge regarding the choices available and allow

them and their families to plan ahead.

- It would also provide important insights for housing associations to use at a strategic level to understand the needs of their tenants and local communities.

Home MOTs would also identify households who might be struggling with their homes and would prefer to move (for an example see the Longhurst Group case study at the end of Chapter 7).

Factors that make moving difficult

In 2019–20 there were 117,800 households on housing waiting lists needing to move on medical, disability or welfare grounds which is 24% of those in a preference category.¹¹³

The average length of time that applicants for accessible homes spend on housing registers appears to about 25 months, but whether they find suitable housing or simply leave the register is unclear.¹¹⁴

Information on accessible housing is poor

Two-thirds (65%) of local authorities are unable to estimate the proportion of social and/or affordable housing that is accessible. Only 19% of authorities in England have an adapted housing register.¹¹⁵

112 Centre for Ageing Better (2019) Home truths, Housing options and advice for people in later life: Learning from communities in Leeds, London: Centre for Ageing Better.

113 Local Authority Housing Statistics dataset, England 2019-20: Section C – Allocations.

114 Adams, L. et al. (2018) Housing and disabled people: the role of local authorities, London: Equality and Human Rights Commission.

115 Adams, L. et al. (2018) Housing and disabled people: the role of local authorities, London: Equality and Human Rights Commission.

The 2020 Social Housing White Paper raised concerns about how vulnerable households navigate allocation systems and how this might be improved. This research has uncovered underlying factors that make this process even more difficult for disabled people:

- The number of adapted homes appears to be decreasing as adaptations are removed at transfer of tenancy.
- Information on adaptations is sometimes missing as not all asset management databases are up to date.
- Most adapted properties have the same void targets as other properties giving little time to match to suitable applicants.

Housing association adaptation teams are so small that they are unable to do much to help with rehousing, although several people interviewed expressed a desire to do more. Most tenants are simply provided with information about the choice based letting system or referred to support from housing management colleagues.

“ I have few dealings with the lettings team, this is something that I would like to change and have raised with my manager.”

Adaptations manager – online survey

Several of the staff responding to the survey said that they often try to find a mutual exchange or transfer rather than people getting stuck on home choice waiting lists. Many disabled tenants prefer this as it gives them

more control of the process and they can get better information about the features of the new home and neighbourhood from the existing tenant than from a home choice system.

Using home choice or other homefinder systems is not easy for many disabled and older people and the information provided online on accessibility and adaptations is often limited. As we have already seen many do not have access to IT.

Just because a home was built as an accessible property or has been adapted does not make it accessible to everyone. Each property will be different, and each person's needs vary. Ideally people need to visit potential properties, but many find this difficult if they do not have a car. Alternatively, disabled people need good information online, including photos of all areas of the home, a floorplan with dimensions, and if possible, a virtual video tour.

The Accessible Now Channel is an extension of the HomeFinder service being developed with disabled residents and OTs. It includes a comprehensive range of information to make easier for people to make decisions.¹¹⁶ However, it will require landlords to make sure the right information is available about each property.

The benefits of help with home moves

A longitudinal study in Scotland followed a

116 <https://homefinderuk.org/accessible-now-channel>.

group of disabled people through the process of finding a new home. It showed that the lettings procedure was complex and often difficult to understand. Each person's needs were different, but most required support with the application, viewing and moving-in processes.¹¹⁷

Although people will usually be given a priority banding in bidding for homes, specialist support with assessment is more limited. Research by the Equality and Human Rights Commission showed that local authorities with larger populations (more than 100,000) were more likely to have specialist assessors (78%) than those with fewer than 100,000 people (22%). London authorities had much better services than other areas with 92% having specialist assessors in 2018.¹¹⁸

Many OTs and DFG teams try to provide help, and some authorities use their Housing Assistance or RRO policy to provide discretionary funding from their DFG allocation to pay for removal fees. There may also be discretionary funding for new carpets, white goods and decoration, but this is not available in all areas.

Managed rehousing

The best relocation schemes are where there is a specialised rehousing team. It is about

'managed rehousing' where people are matched to properties rather than the current system of leaving people to deal with the CBL system on their own. Under the current system people do not always end up in the right homes and there is wastage of the adapted and accessible stock. A managed system would make this work more effectively.

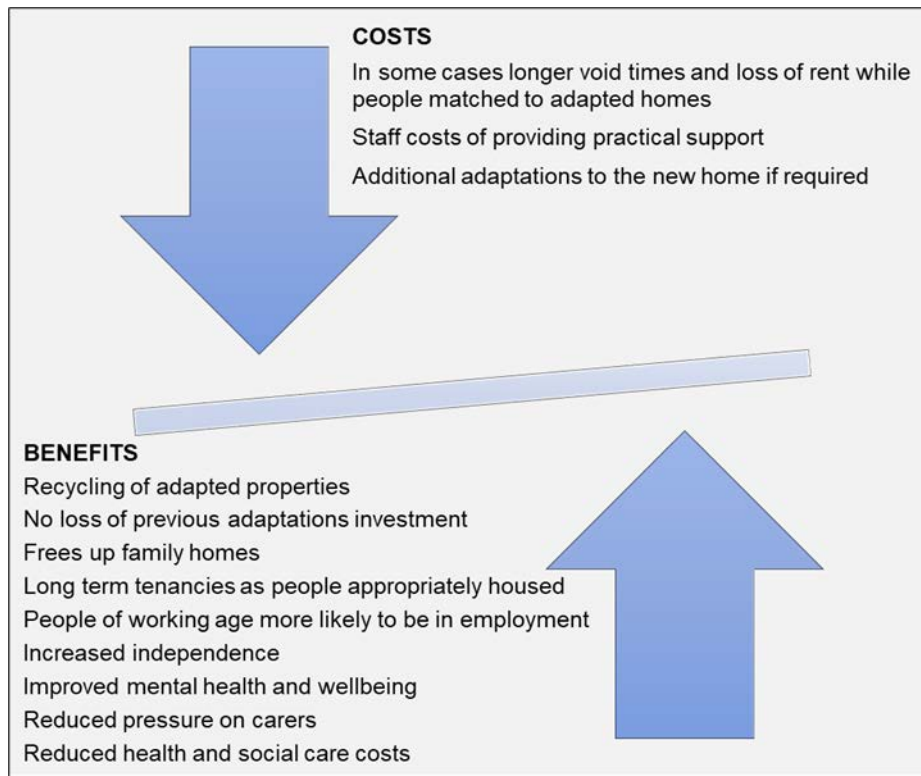
Ideally an OT should be involved to assess who is waiting and their property requirements. They can see if any properties are available and suitable or whether any can be adapted. Taking people to look at homes is still the best option, but the pandemic has shown the advantages of 'virtual viewings' where the dedicated officer videos the property and talks it through with the disabled person.

There are some very effective services run by housing associations, often in conjunction with home improvement agencies (see box). However, some are restricted to older people when disabled people of all ages require help. The savings can far outweigh the costs (Figure 8.1).

117 Anderson, I., Theakstone, D. and Lawrence, J. (2020) Inclusive Social Lettings Practice: Opportunities to Enhance Independent Living for Disabled People, Vol 8, No 3 Home, Housing and Communities: Foundations for Inclusive Society, DOI: <http://dx.doi.org/10.17645/si.v8i3.2957>.

118 Adams, L. et al. (2018) Housing and disabled people: the role of local authorities, London: Equality and Human Rights Commission.

Figure 8.1. The costs and benefits of a managed housing service



Bolton at Home - - Housing Options for Older People Service (HOOP)

Bolton at Home is the LSVT for Bolton and is commissioned to manage the Bolton Care and Repair service, Bolton Council’s Home Improvement Agency (HIA). They also operate two additional services as part of the Bolton Care and Repair service:

1. **Housing Options for Older People service (HOOP)** is fully funded by Bolton Council and set up in 2018 for people over 60 to help them make informed choices about their housing:

- Staying in their current home with adaptations, home improvements, or additional support.
- Moving to a new home.

2. **Delayed Transfer of Care (DTC)**

service is funded through a combination of health, social care and housing funding and was also set up in 2018. The service provides housing interventions so people can come home from hospital quickly. It also prevents readmission.

The services work across tenures. Each service has its own Housing Options Advisor with the HOOP Officer based in the Bolton Care and Repair service and the DTC in the hospital with the discharge team. Both services were evaluated in the first two years of operation 2018-2020.

First year of operation: 484 referrals - 213 for HOOP and 271 for DTC:

- Over 40% of those accessing HOOP and

DTOC were social housing tenants, mostly those in general needs properties, but also a number in sheltered or specialist housing.

- The majority who moved went into sheltered housing provide by social landlords.
- A third of those who went into social housing had previously been in private accommodation.
- Others were helped to stay put in their existing homes through provision of home adaptations delivered by Bolton Care and Repair.

The benefits of the HOOP and DTOC services for landlords are:

- Helps people move to more manageable homes from larger general needs properties to free them up for families.
- Properties that are already adapted are matched to people who need them.
- People are supported with bidding so that they do not drop out of the process.
- Reduces the time properties are left vacant.
- Sustains tenancies through financial help and referrals for support from other services.
- Provides a single point of contact to help people through what would otherwise be a complicated web of service provision.

Social return on investment in first year:

- **£95k** investment resulted in estimated savings of **£1.38m** in reduced use of residential care, lower costs from falls, fewer delays in hospital discharge, less on-going social or health worker involvement, and improved wellbeing of individuals.

- **For every £1 invested a minimum of £14.50 was saved.**

A social worker described these services as the missing links in service provision.

Adapting a home after moving

To prevent people accepting inappropriate properties many associations will not allow adaptations within the first six months to a year. First time tenants are often required to complete a probationary period before adaptations will be approved. There are also difficulties in approving a DFG for adaptations prior to someone taking up a tenancy which can delay getting necessary work completed. Given the lack of accessible homes and the pressure on people to accept properties quickly these policies do little to keep people active and independent.

Others can find a home that will work but still fail to get the right adaptations. An occupational therapist provided an example of a family with a disabled child who had done a house swap. The housing association refused to allow a level access shower because the property was classed as a 'family home' and they would not remove the bath. The OT suggested the family take the issue further, but they did not wish to pursue it. These cases may therefore not come to the attention of the Ombudsman service.

Once in a home that is not right it is very hard to move again. The 2018 report on the Hidden

Housing Crisis by the Equalities and Human Rights Commission included interviews with disabled people. Multiple participants had felt forced to accept inappropriate housing but then became 'stuck' as they were no longer considered to be in priority need.¹¹⁹

External environment

Another issue that concerns people when they move is the external environment. Independence within in the home is not enough, people need to be able to connect easily with the outside world. Information on the external environment needs to be included on home choice systems, such as:

- Access to garden
- Availability and location of designated parking
- Access to public transport
- Access to local shops
- Lighting of outdoor spaces and pathways.
- Width of paths and pavements.
- If there are dropped kerbs.
- If paths often blocked with wheelie bins and other obstacles.
- Steepness of hills.
- Access to green space nearby.

Disabled people in high rise buildings

Further issues have arisen following the Grenfell Fire. In total 52 of the 120 flats had disabled occupants and 15 of the 37 residents

classified as vulnerable were among the 72 killed.

Sir Martin Moore-Bick, chair of the Grenfell Inquiry, recommended that *"the owner and manager of every residential high-rise be legally required to prepare personal emergency evacuation plans for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition)"*.¹²⁰ Up-to-date information should be kept in the premises information box.

Fire chiefs and landlords have said that personal evacuation plans are unworkable. However, if there is no action to protect disabled people it raises serious issues about the future allocation of upper floor flats to residents unable to self-evacuate in case of emergency. Many disabled people are unwilling to take these properties, but often have very little choice. Whether it would be appropriate to approve DFG adaptations in these properties is questionable without considering ability to exit the building in case of fire.

Some landlords have begun to improve fire prevention and evacuation procedures but how much this is focussed on the needs of disabled people is unclear. Paradoxically, the installation of fire doors to make buildings safer can make it harder for disabled people to enter and leave their homes because the doors are

119 Satsangi, M. et al. (2018) The housing experiences of disabled people in Britain, London: Equality and Human Rights Commission.

120 Grenfell Tower Inquiry: Phase 1 Report Overview. <https://assets.grenfelltowerinquiry.org.uk/GTI%20-%20Phase%201%20report%20Executive%20Summary.pdf>

often too heavy or difficult to open. The 2021 National Disability Strategy has committed to ensuring the safety of disabled people in buildings when there are emergencies, and at the time of writing DLUHC was undertaking research to review the evidence around means of escape for disabled people.

Avoiding harassment and hate crime

If housed in the wrong area disabled people can feel very vulnerable, and there are many instances of people being attacked because of their difference. Disability hate crimes rose by 14% 2017/18 to 2018/19.¹²¹ Almost half of disabled people (45%) say they feel unsafe in their neighbourhood.¹²²

Housing organisations have a responsibility, not just to help when someone is targeted, but to ensure that disabled people are not placed in a home where they are likely to feel afraid or be exposed to abuse.

As was mentioned at the end of Chapter 4, it is also extremely important to improve the design of adaptations used outside of properties, such as ramps and rails, so that these do not make it obvious that a home is occupied by someone who might be older or disabled who might be targeted by criminals.

The Social Housing White Paper aims to drive

121 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839172/hate-crime-1819-hosb2419.pdf.

122 Department for Work and Pensions (2021) National Disability Strategy. Part 1: practical steps now to improve disabled people's everyday lives. <https://www.gov.uk/government/publications/national-disability-strategy/part-1-practical-steps-now-to-improve-disabled-peoples-everyday-lives>.

better performance in the reporting and tackling of anti-social behaviour. It is hoped that this includes issues specifically relating to disability.

Joining up rehousing services for disabled people

A well-resourced and integrated team providing both home adaptations and managed rehousing would reduce the problems of people accepting unsuitable homes, being placed in high rise dwellings with no means of escape, or moving to areas where they would be unsafe. It would also mean that people could get the right adaptations after moving as many homes will need some modification to make them safe and fully accessible.

The following chapter looks more closely at how housing association services could be better integrated to meet the needs of disabled people.

SUMMARY: MOVING RATHER THAN ADAPTING

- **Lack of social housing relative to demand puts huge pressure on landlords** who have to deal with long waiting lists and have to balance the needs of disabled people alongside those on the waiting list.
- **People should not be refused a DFG and made to move** - under the Equality Act 2010 and the 2020 High Court Ruling 'McKeown vs Islington'.
- **In many areas options to move are limited for people of all ages** – we are not building enough accessible housing and only 20% of association homes have four accessibility features.
- **Specialised housing is unevenly distributed** - some landlords have very little specialist stock or have older sheltered units with awkward layouts that are difficult to upgrade or adapt.
- **It is difficult for disabled people to find accessible homes** – two-thirds of local authorities are unable to estimate the proportion of social and/or affordable housing that is accessible and only 19% of local authorities have an accessible housing register.
- **Void targets reduce the time available to match people to suitable properties** – more adapted properties need to be matched to those who need them.
- **Handovers are common** - adaptations teams are small and often unable to help with moving so tenants get passed to another team rather than having one point of contact.
- **Housing reviews and home MOTs** - need to be used to identify people's needs earlier.
- **Accessible Now Channel (part of HomeFinder)** - includes information to make easier for people to make decisions about properties. Housing associations need to make sure they can provide this information.
- **Many disabled and older people need support** - with the application, viewing and moving-in processes.
- **More 'manged rehousing' is needed using a specialised rehousing team, ideally with a housing OT** - people matched to properties and helped with viewing. Services should be available to disabled people of all ages, not just older people.
- **Monitoring shows the benefits of practical support with rehousing** – it provides a single point of contact, prevents people dropping out of the process, matches people to properties, frees up larger homes, reduces the time properties are left vacant, sustains long-term tenancies, and provides substantial savings to health and social care.
- **Flexible policies are needed to help people adapt their homes after a move** – not allowing adaptations in the first year after moving does little to keep people independent.
- **Joined-up adaptation and managed rehousing services for disabled people** - would

reduce the numbers accepting unsuitable homes, avoid placement in high rise dwellings with no means of escape, or in areas where they would be unsafe.

RECOMMENDATIONS - HELPING PEOPLE TO MOVE

HOUSING ASSOCIATIONS

- Routine housing reviews to include future housing needs (adaptations/moving).
- A 'Managed Rehousing' service to match people to properties and provide practical support for disabled and older people needing to move.

9. AN INCLUSIVE HOUSING POLICY

9. An inclusive housing policy

Almost 30 years ago, not long after the DFG was first introduced, Frances Heywood wrote a report called 'Adaptations: finding ways to say yes'.¹²³ Although there have been many changes and improvements in the intervening years, many of the same problems she described persist. The adaptations process is still too complex, tenants still have too many barriers to overcome, and we need to find new ways to say 'yes'.

The DFG legislation is over 30 years old. Many people want to keep it as it is because it is the only mandatory grant and a vital safety net for those who cannot afford to improve their own homes. Most changes can be achieved through guidance and encouragement of good practice.

It is as much about changing culture as

about legislation and guidance. As the judge summing up in the 2020 High Court Ruling 'McKeown vs Islington', pointed out, it is very rare to have a mandatory grant; we need to stop imposing obstacles and start removing barriers.

“ The existence of mandatory grants is extremely rare and that rarity illustrates that the mindset of the decision-making authority must not be to search for grounds to refuse the grant.”¹²⁴

To start saying 'yes' requires a different mindset as outlined in Figure 9.1.

123 Heywood, F. (1994) Adaptations: Finding ways to say yes, Bristol: School for Policy Studies.

124 McKeown, R (On the Application Of) v London Borough of Islington [2020] EWHC 779.

Figure 9.1 A shift in focus to find ways to say 'yes'

• From assets	➡ to people
• From new build	➡ to the existing stock
• From 'our property'	➡ to 'your home'
• From tenants and applicants	➡ to customers
• From value for money and welfare	➡ to investment for the longer term
• From silos/protecting budgets	➡ to an overall inclusive policy
• From reacting at crisis point	➡ to prevention
• From finding ways to say 'no'	➡ to developing ways to say 'yes'

There are a number of changes that could be made across the housing association sector which would improve the way services for disabled people are delivered. These include:

- More disabled staff and disabled staff in leadership positions.
- Better data on disabled residents and more involvement of residents in planning services.
- New customer service improvement teams to bring services together for disabled tenants.
- An inclusive housing strategy.
- Inclusive housing as part of major new housing initiatives.
- A focus on prevention.
- Linking housing and health.
- A clearer focus on outcomes and accountability.
- A better process for complaints.

This final discussion presents practical suggestions for housing associations about how these changes might come about including changes at national level to improve oversight, monitoring and the measurement of results.

Disabled staff and those in leadership positions

Over half of housing association residents (54%) have a long term illness or a disability and almost a fifth (18%) of new tenants have specific disability needs. They are a key part of the social housing population and need greater prominence in policies, planning and service delivery.

Homes England produced its first Equality, Diversity and Inclusion report in 2020.¹²⁵ This showed that only 5.2% employees declared a disability. They have set up a Disability and Carers Network and Neurodiversity Network to educate and raise awareness about diversity issues. Homes England also has an objective to 'deliver homes for the communities we serve'.

The 2021 National Housing Federation (NHF) report on Diversity and Inclusion acknowledged that disabled people are not visible as leaders in the sector and that only 4.8% of association

125 Homes England (2020) Annual Equality, Diversity and Inclusion Report 2020/21

board members identified as disabled.¹²⁶

The NHF acknowledge that the sector has been talking about diversity for a long time, but that this has not resulted in significant change. They mention how easy it is to appoint staff members who are the same as the those you already have so they will ‘fit in’, and that it takes courage to appoint somebody who is different. To deliver the recommendations in the Social Housing White Paper the NHF has been working with residents to establish a four-point plan for change:

- 1) A new requirement in the National Housing Federation Code of Governance for boards to be accountable to their residents.
- 2) A new ‘Together with Tenants Charter’ to set out what residents can expect from their housing association landlord.
- 3) Resident oversight and reporting of progress against the charter.
- 4) Giving residents a stronger collective voice with the regulator.

However, the NHF acknowledges the difficulties of representing all tenants.

“ A common point of discussion.... was the challenge of representative resident participation – including diversity of residents on boards or committees, as well as ensuring diverse voices are sought out, and listened to, in decision-

making.”¹²⁷

To see how workforces compare to the characteristics of residents the NHF launched a new Equality, Diversity and Inclusion tool in April 2021 and conducted a survey of their members. The regional results mirror those reported nationally, with significant under-representation of disabled people as staff or leaders in the sector. Although the NHF asked associations for data about residents there were too many gaps to allow comparison of staff with population characteristics.¹²⁸

There is potentially a huge pool of talent hidden within the housing association sector given the number of disabled people it houses and the high proportion who are unemployed. Disabled residents understand the issues from their own lived experience and could help bring about real change if given the chance to train and progress within associations. Housing associations have an opportunity to do so much to close the disability employment gap.

Ending the invisibility of disabled residents

The Covid-19 pandemic has led many associations to engage with their tenants in new ways, learn more about their needs and offer new services. How much of that work will continue longer term, and whether the

126 National Housing Federation (2021) Equality, diversity and inclusion: An insight review of housing association staff in England.

127 National Housing Federation (2020) Together with Tenants – lessons from the early adopter programme.

128 <https://www.housing.org.uk/our-work/diversity-and-equality/>

information collected can be used to help identify people with adaptation or rehousing needs is more difficult to determine.

The Equality and Human Rights Commission in the 'Hidden Housing Crisis' showed that people living with different disabilities or combinations of disabilities can have very different housing requirements. They point out that *"making generalisations from data on prevalence of disabilities has been proven in the past to result in poor housing planning."*¹²⁹

More detailed, granular data on disabled residents is often lacking. Data could be improved if there was a real commitment to diversity and inclusion. There are several issues to overcome.

The way data is collected and stored:

- GDPR data protection regulations introduced in 2018 have made organisations reluctant to collect and store information on health and disability.
- Information is incomplete or inconsistent due to mergers into bigger groups.

Difficulties of identifying residents:

- Disabled people spend more time at home, are more isolated and therefore more invisible.
- Many impairments are not obvious.
- Older people do not think of themselves as disabled and may not come forward for help.

- Some people are reluctant to discuss their difficulties, even if they are struggling or in pain.
- For some people there is still stigma attached to talking about impairments, health conditions and cognitive issues.
- A third of disabled people feel there is prejudice against them which makes them wary of discussing their impairments.¹³⁰

The Equality Act 2010 requires all information and materials to be available in accessible form. It is also important that, in dealing with their landlord, disabled and older tenants feel comfortable, able to express themselves, and are treated with respect, including people who struggle with social interaction or who use non-typical communication methods.¹³¹

A survey and focus group with older and disabled tenants of a small housing association (conducted by one of this report's authors in 2018) explored what they felt about services, and what they would like their landlord to know and record on their file.

The association was formed from the merger of two smaller organisations. There was a reasonable amount of information about age and disability for one association, but virtually nothing for the other; a situation that is probably common as so many associations have merged to become part of bigger groups. Disabled, older and vulnerable tenants are

129 Adams, L. et al. (2018) Housing and disabled people: the role of local authorities, London: Equality and Human Rights Commission.

130 Dixon, S., Smith, C. and Touchet, A. (2018) The disability perception gap, London: Scope Policy report. <https://www.scope.org.uk/campaigns/disability-perception-gap/>.

131 Hemingway, L. (2011) Disabled People and Housing, Bristol: The Policy Press.

sometimes labelled 'difficult to reach' but in many cases it is the reverse – it is the association that is difficult to reach. Many associations have reduced their neighbourhood services and replaced them with a central call line. The 2018 research showed that many disabled people find these call centres dispiriting to use as the people answering the phone do not know them and often try to hurry them. Worst of all, it means they need to explain details about their impairment every time they call.

The people taking part in the 2018 research also did not appreciate some of the progressive methods for engaging with residents, such as neighbourhood campaigns where staff knock on doors to introduce themselves. Some disabled people struggle to get to the door, others worry about the state of their homes, and those with mental health issues and anxiety do not want to let anyone in. They said they would much prefer a proper appointment system to see staff.

In the 2018 survey residents said they wanted:

- **Not to have to retell their story** each time they speak to staff.
- **A neighbourhood officer** they can get to know and who knows them.
- **Landlords to record the impact of impairments and the type of help required** (rather than medical conditions) as this is positive and non-stigmatising. For example, if someone has arthritis, record that they have mobility and dexterity problems, or if they

have had a stroke, that they use a walking aid and need more time to make themselves understood.

- **Staff to have access to information**, so that they know the best way to communicate and can give people more time if required.
- **A supportive environment** to be able to talk about any problems with their homes.

A clearer focus on prevention means every opportunity needs to be taken to find people who may need help:

- **Routine housing reviews** – these need to include discussion of problems people are experiencing with their homes and options for adaptations or moving home.
- **Home MOTs** – to look at house condition, repair and maintenance issues, and adaptation and rehousing needs.
- **Making every contact count (MECC)** - to find people who need help.
- **Single point of contact for referrals.**

Co-production with disabled residents

is essential so that people can have input into what is recorded and how they want services to work. Although it is often easier for this to happen in smaller and resident-led associations, all landlords need to find ways to engage better with their disabled and older residents. Co-production is all about listening; finding out what the issues are from the tenant's perspective, and the solutions disabled people want and need.

Eastlight Community Homes – resident involvement

As a Community Gateway organisation, residents have a strong voice and can become shareholders. They can scrutinise performance and vote on strategic decisions. A new Customer Influence Committee, made up of residents, works directly with the Board and there is an appeals panel for aids and adaptations. Residents are involved in shaping policy, strategy and procurement panels.

There was resident input into the adaptations specification which helped develop designs that look less medical, with better quality rails, more hidden adaptations and attractive non-slip flooring. Residents are keen on having drop-down baskets in kitchen cupboards, and would like to include assistive technology, such as using a phone to control the lights.

New customer service improvement teams

The new Social Housing Charter requires a shift in focus from asset management to people. As a result, landlords are starting to develop new Customer Service Improvement teams. There is potential for these teams to deliver much more joined-up services for disabled and older people which could include:

- Home adaptations – minor, major, complex and common parts.

- Advice and support for tenants carrying out their own adaptations and improvements.
- Housing options advice.
- Managed rehousing.
- Home technology.
- Inclusive environments outside of the home.
- Fire evacuation planning.
- Harassment and hate crime.

This team could also be responsible for making sure that databases about disabled tenants are compiled and updated and that effective methods of communication and engagement are developed.

Developing an inclusive housing policy

The Scottish Federation of Housing Associations (SFHA) in conjunction with Stirling University has developed a very useful suite of materials designed to help social housing providers take a more holistic approach to accessibility and inclusive living.

The **Inclusive Living Toolkit** allows staff from different areas in one association, or within a group, to develop an inclusive living strategy that will work across strategic areas.¹³² The toolkit brings staff and residents together using consultation and co-production techniques to look at a range of issues around:

- Physical space and design.
- Connections and relationships.
- Social inclusion and equality.

132 Scottish Federation of Housing Associations (2020) Inclusive Living Toolkit: checklist tool. <https://www.sfha.co.uk/mediaLibrary/other/english/67155.pdf>.

Support can be provided for any organisation that wants to use the toolkit. Although it has been developed in Scotland the materials are universal and the resources and methods would be very helpful for any housing association wanting to develop inclusive living for residents of all ages.

Every housing association needs an **Inclusive Housing Lead** (ideally part of the team to improve the customer experience) to develop the strategy.

Better design must underpin the Inclusive Housing Strategy. The accompanying design guide (<https://www-foundations.uk.com/design/>) shows that it is possible to provide designs that look great, avoid adaptations being removed, would future-proof the stock and cut down on the need for further adaptations.

Given the high proportion of disabled and older people there is a need for a far more flexible housing stock that can adapt to people's changing needs over the life course. It is not just about new homes, but about how we can make the whole housing stock work for everyone.

Inclusive housing as part of overall strategies

Inclusive design needs to be woven into all forms of investment in homes. Key strategies over the next few years will be:

- Cyclical maintenance, repair and improvement.

- Major improvement work in response to a refreshed Decent Homes Standard.
- Cladding replacement and fire prevention measures.
- Decarbonising homes to reduce greenhouse gas emissions.

Adapting homes is a tiny amount of investment compared to these policies. Unfortunately, that means it can easily get forgotten. For example, when the previous decent homes standard was drawn up it failed to include any mention of disabled people or adaptations which meant that an opportunity to radically change levels of accessibility in the social housing stock was missed.

When the previous decent homes standard was drawn up it failed to include any mention of disabled people and home adaptations which meant that an opportunity to radically change levels of accessibility in the social housing stock was missed.

It is very important that the housing needs of older and disabled people do not get forgotten in the development of the next round of major housing policies. These major investment programmes are an ideal opportunity to ensure that homes and communities work better for everyone.

Many of the people running these major new initiatives will not be aware of the proportions of older and disabled people in the social housing stock and the need to include issues about

inclusive living. It is why every association needs an inclusive housing lead and an integrated customer services improvement team. Changes that will benefit disabled and older people will require strong and co-ordinated leadership.

New homes need to be adaptable

A coalition of organisations called Housing Made for Everyone (HoME) has called for urgent action to ensure new housing is suitable for the needs of disabled and older people.¹³³ The government consulted on raising the standard in the autumn of 2020 but at the time of writing this had not resulted in changes to the regulations. It is important that building control ensures that the M4(2) standard is properly applied where intended and associations need their access champion to pick up any issues before occupation.

OTs and adaptations staff in housing associations and local authorities would welcome the chance to work more closely with development teams, contractors and firms developing new homes to make sure they avoid common problems and learn what makes a home not just accessible but also easy to adapt.

New construction methods are making the fitting of adaptations more time-consuming and expensive. Engineered wooden beams may reduce build costs but make it very hard to fit hoists to ceilings or drop shower trays into

bathroom floors. Even the fitting of grabrails and handrails, which should be quick and easy, can become much more complicated and costly if there are non-structural walls in key places such as bathrooms and staircases.

In interviews for this study, none of the housing association adaptation staff had been involved in the planning of new homes. Even within local authorities there is still limited cross-fertilisation between development departments, planning teams and adaptation services, even when they are in the same directorate.

Linking development teams with OTs and adaptations staff more effectively would also help to overcome a common complaint, that it is hard to find disabled tenants to take new accessible homes. This should never happen as there is always a pool of disabled people who need to be better housed. If it does happen, it indicates incomplete data about residents, a lack of involvement of the right people at the planning stage, and poor strategic decision-making about what and where to build.

Preventative services

For most people adapting their home is usually a one-off event. Unless they have friends or relatives who have already had their home adapted, they do not have a clear picture of how the process works or what their choices are. People often delay acting which means they often end up going through the adaptation

133 <https://www.habinteg.org.uk/homecoalition>.

process at a low point in their lives, when they've come out of hospital, had a fall, their condition is getting worse, or they and their carers can no longer cope.

Prevention requires people to have access to advice and information so that they can start making decisions earlier, not at the time they are in crisis. This is needed for people from all tenures.

Re-imagining the home improvement agency
New services could be provided by re-imagining and expanding the network of independent home improvement agencies (HIAs). Many were initially set up with housing association assistance from organisations such as Anchor, Hanover, and Orbit. Others, such as Peabody continue to play an important role. Despite housing association funding and support, in the past HIA services were often not available to housing association tenants, but only to owners and private tenants.

There is still a Care & Repair service in almost all authorities in Wales, but in England many independent services have disappeared. Most are now run in-house by local authorities, particularly since local government expenditure shrank after the 2008 financial crisis. Many in-house HIAs tend to have a more limited range of services and focus on statutory duties, such as the DFG, although there are some that have used additional DFG funding to provide

much broader services. Most services are not widely advertised and there are very few drop-in centres.

In 2018 the Communities and Local Government Committee took evidence about the housing needs of older people and recommended a return to having an HIA in every local authority area.¹³⁴

More recently the Good Home Inquiry has had extensive dialogue with people of all ages and backgrounds, with a focus on people aged 50 plus.¹³⁵ The Inquiry identified that people experience a sense of inertia when it comes to making improvements and they need support to both recognise the issues and see that it is possible to resolve them. Support is particularly important for disabled people, those with health problems and those who have lost someone who used to take on responsibility for the upkeep of the home.

The Inquiry found strong backing for **Good Home Hubs** where people from all tenures can access impartial information and get proactive advice. Housing associations could play a major role in developing these hubs.

Linking health and housing

A National Memorandum of Understanding (MOU) to improve health and care through the home was originally drawn up in 2014 and

134 Communities and Local Government Committee (2018) Housing for Older People.

135 The Good Home Inquiry (2021) The Good Home Dialogue, London: Centre for Ageing Better.

updated in 2018.¹³⁶ It brings together a range of organisations across the housing, health and social care sectors. The aim is to work together to deliver better health and wellbeing outcomes and reduce health inequalities with the focus on the home as the cornerstone of our lives.

There is already a Health and Wellbeing Board in each area and often a separate board for the Better Care Fund (the DFG is part of this fund). The Social Care White Paper 2021 and the 2022 White Paper 'Joining up care for people, places and populations' recommend better place-based planning for health, social care and housing.^{137 138}

Housing associations need to be part of that place-based approach. This is harder for regional and national associations that cover many areas, but where they have substantial stock, they should be involved in place-based planning. There is a real need for home adaptations and the DFG to be part of that place-based approach as adaptations play such an important role in keeping people independent at home.

Home adaptations and inclusive housing cannot be seen in isolation. Each area needs a suite of services to improve wellbeing and

independence. Home adaptations are only ever one part of the solution to keep people independent and living full lives.

Measuring outcomes

Management guru Peter Drucker once said, "what gets measured gets managed". Conversely, what does not get measured can fail to get on strategic or operational agendas, even when it affects a high proportion of tenants.¹³⁹

DLUHC collects data annually on the DFG, but this relates to outputs not outcomes. The Better Care Fund that administers the DFG has no specific housing metric; their outcome measures only include health and social care criteria. The 2018 DFG Review recommended that each Better Care Fund should report separately on DFG funding and on a new metric 'the number of people helped to remain independent at home'.

It is difficult for housing associations to collect data on home adaptations if they do not control the whole end to end process. Most record outputs in terms of numbers of minor and major adaptations completed against budget spend, but few look at outcomes and impact. WDH in Wakefield is an exception (see case study in

136 Improving Health and Care through the home: A National Memorandum of Understanding (2018)

137 Department of Health and Social Care (2021) People at the Heart of Care: Adult social care reform white paper.

138 Department of Health and Social Care (2022) Joining up care for people, places and populations: The government's proposals for health and care integration, CP573.

139 Mackintosh, S. and Heywood, F. (2015) The Structural Neglect of Disabled Housing Association Tenants in England: Politics, Economics and Discourse, *Housing Studies*, 30:5, 770-791. <https://doi.org/10.1080/02673037.2015.1044947>.

Chapter 7). This LSVT follows up customers to monitor the impact and outcomes of changes to their homes.

If housing associations take over more control of the adaptation process and bring together services for disabled people in a more coherent way, it would allow better measurement of outcomes and feedback into continued service improvement.

Improving accountability

More than a decade ago the Audit Commission, a public spending watchdog, used to inspect housing associations' home adaptations activity and this had a significant impact on adaptations spending and delivery.

Inspection was introduced in The Local Government Act 2003, but in 2008 a regime of 'short notice inspections' (SNIs) was developed. SNIs were focussed on three themes 'access and customer care', 'diversity', and 'value for money' using Key Lines of Enquiry (KLOE). Each association also had to demonstrate that they were consulting specific groups of residents including older people, people with caring responsibilities and those with disabilities.¹⁴⁰ Inspections targeted on aids and adaptations in effect acted as a litmus test for how well policies for vulnerable groups were working.

Targeted inspections had a considerable impact because the results were published nationally and made available to tenants. Examples of good practice were also published.¹⁴¹ As a consequence, budgets for adaptations began to increase, sometimes quite significantly, leading to better approaches to delivering adaptations.

Unfortunately, the Audit Commission was discontinued due to austerity measures introduced in the Spending Review of 2010 and inspections ended.

One of the most significant changes promised by the Social Care White Paper is a shift back to regulation of consumer standards with inspections of landlords with more than 1,000 homes every four years. At the time of writing the Housing Regulator's Corporate Plan includes nothing on disability. It can only be hoped that the new inspections will be similar to the earlier Audit Commission inspection regime.

A better complaints process

A survey carried out by the Ministry of Housing, Communities and Local Government and referenced in the Social Housing White Paper found that 59% of issues raised by social housing residents do not go on to become official complaints, and many take too long to be resolved. It also showed that a third

¹⁴⁰ Audit Commission (2008) Short Notice Inspection of Housing Associations: Statement of Methodology, London: Audit Commission p.13.

¹⁴¹ Audit Commission (2010) Short Notice Inspection - Resident Involvement and Aids and Adaptations: Knightstone Housing Association, London: Audit Commission.

of tenants were concerned about retaliation by their landlord. A new 'Make Things Right' web portal for social housing complaints has been established to try to overcome these shortcomings.¹⁴²

at helping vulnerable social housing residents access the complaints system. It is hoped that they can address some of the issues and concerns raised in this report.

Complaints that escalate are dealt with by the Ombudsman and, under the Charter for Social Housing, are to be dealt with more quickly using mediation where possible.¹⁴³ However, because home adaptations cross the boundaries between housing associations, social care OT services, and local authority housing departments, there is no single route for complaints. Depending on their nature they may be directed to the Housing Ombudsman or the Local Government and Social Care Ombudsman. The different services are now beginning to work more closely together which may enable complaints to do with home adaptations to be dealt with more systematically.

The Housing Ombudsman has been given the power to explore the wider and deeper issues underlying complaints to see if there is any systemic service failure.¹⁴⁴ This might enable the Ombudsman to look more closely at issues affecting disabled and older people.

The Housing Ombudsman has set up a resident panel of 600 members which will advise the complaints arbitration service on how it works. There will also be a new "expert" group aimed

142 <https://socialhousingcomplaints.campaign.gov.uk/>.

143 Ministry of Housing Communities and Local Government (2020) The Charter for Social Housing Residents: Social Housing White Paper.

144 Housing Ombudsman Service (2021) Systemic Framework.

SUMMARY: INCLUSIVE HOUSING POLICIES

- **It is very rare to have a mandatory grant like the DFG** - we need to stop imposing obstacles, remove the barriers and start saying 'yes' to adaptations.
- **We need more disabled staff and people in leadership positions** - in housing associations, in Homes England and the Housing Regulator.
- **Associations need to reach out and find their disabled tenants** – they are not 'hard to reach', it is often associations that are hard to reach.
- **Information on disabled tenants needs to be added to databases** – but deciding on methods to obtain data and what gets recorded needs to be done in co-production with disabled people.
- **Disabled people of all ages are a key part of the social housing population** and need to play a more prominent role in the co-production of planning, policies, and service delivery.
- **Disabled tenants should not have to keep re-telling their story** – replacing neighbourhood offices with call centres has taken away the personal approach.
- **Customer service improvement teams** – provide an opportunity to join up services for disabled tenants to make sure adaptations, home moves, and other aspects of service delivery are properly integrated.
- **An Inclusive Housing Lead** – would help co-ordinate services for disabled people and make sure they do not get left out of policy decisions.
- **The Inclusive Living Toolkit** – will help association staff and tenants work together to develop an effective inclusive housing strategy.
- **Major investment programmes need to address disabled people's needs** (cyclical improvement, major refurbishment, decent homes, fire prevention, energy efficiency) – and include home adaptations.
- **Modern construction methods are making homes harder to adapt** – OTs and adaptation teams need to be involved in the planning process for new homes.
- **New home improvement agencies/good home hubs** – housing associations could play a major role in funding and developing any new hubs which could help people from all tenures plan ahead more successfully.
- **Place-based planning for integration** (health, housing social care) – housing associations need to be involved and strategies for home adaptations need to be part of the planning of integrated services.
- **Measurement of outcomes of home adaptations and home moves** – needs to feedback into continued service improvement.

- **Ombudsman services need to work together** to see if there are systemic issues around home adaptations.
- **New inspection regime** – it is hoped that the Housing Regulator will look specifically at services for disabled and older people (including home adaptations and home moves), perhaps in a similar way to the Audit Commission short notice inspections.

RECOMMENDATIONS - INCLUSIVE HOUSING POLICIES

HOUSING ASSOCIATIONS

- Base the service in an integrated 'inclusive housing' or 'customer service improvement' team.
- Appoint an Inclusive Housing Lead to ensure that disabled people do not get left out of major strategic and policy decisions and that services are joined up more effectively.
- Appoint more disabled people to leadership positions and increase the number of disabled people employed in all departments.
- Use co-production with disabled and older tenants to drive service improvement

HOMES ENGLAND AND THE HOUSING REGULATOR

- Inspection regime to include home adaptation and home move services for disabled people of all ages.

10. CONCLUSIONS

10. Conclusions

This is a long report about what some may regard as a niche topic. However, disabled people and those with a long term illness are not a minority; they are a key customer group making up more than half of all existing tenants and almost a fifth of all new lettings. The average age of tenants is 52 and demand for adaptations is likely to grow as the population ages. There are also high numbers of disabled tenants of working age and families with disabled children who are often poorly housed. More than half of those who need adaptations do not have them.

It is no use relying on new housing to solve the problems. New accessible homes are very important, but as many people have pointed out, most homes we will be living in in 50 years' time are already built. The majority of tenants will never live in a brand new property. We need to address the shortcomings of the existing stock and make it work for all those people who struggle with their home

environments.

Some housing associations have excellent home adaptations services and we've given some examples. We know there are many more examples that we have not highlighted. However, we have also demonstrated that many services are under-resourced, or not working effectively to get help to the people who need it in a fast and efficient way.

All too often barriers are placed in the way, there are delays in the application process, people are not allowed adaptations or asked to move instead. Worst still, despite increasing level of investment, the number of adapted homes is shrinking not growing as poor quality adaptations are removed at change of tenancy.

The underlying problem is that the funding and delivery of home adaptations was never properly designed as a service, instead it has evolved from different strands of social care, housing and equality legislation for adults and children. This has left the adaptation of

homes effectively orphaned; marooned in a gap between different departments, policy areas and government oversight, with responsibilities unclear and split between numerous organisations.

Within housing associations, it has become an invisible operational issue which is not effectively integrated with overlapping services such as cyclical improvement, decent homes, management of voids, home moves and the development of new accessible homes.

There is a lot that housing associations, could do to make home adaptations and the inclusivity of the general housing more a more central issue. It begins by understanding more about the needs of disabled tenants, taking more responsibility for the whole adaptations process, and integrating it better with other policies and services. Local authorities, Homes England, the Housing Regulator and central government all have a part to play to remove the confusion about who is responsible for the funding and delivery of home adaptations and give landlords a clearer role.

Housing associations need:

- To employ more disabled people and get more of them into leadership positions.
- To seek out disabled tenants and bring them into the decision-making process.
- Better data - on disabled tenants and the adapted and accessible housing stock, and more measurement of outcomes to feed back into service improvement.

- Properly staffed and resourced home adaptation and move on services - the right skills and training, adequate minor works budgets, and much better partnerships with local authorities to ensure that the DFG funding can be used more effectively and consistently.
- To integrate home adaptations with related services, particularly home moves – possibly as part of Customer Service Improvement.
- More emphasis on prevention - tenants need help to look ahead so that adaptations or home moves are not done at crisis point. This could be through re-designed routine housing reviews, home MOTs, or advice and support provided by jointly funded HIAs or Good Home Hubs.
- An overall policy for inclusive housing (focussed on the existing stock not just new developments) - with someone appointed as the Inclusive Housing Lead to drive this forward and make sure that major investment decisions do not exclude the needs of disabled tenants.
- To be innovative – associations can play a big role in improving the design of home adaptations to make them more up to date, inclusive and acceptable to all tenants.

Local authorities need to:

- Use landlord rather than tenant DFG applications to make sure that delays in housing association cases are kept to a minimum.
- Give more responsibility for adaptations to housing associations (where appropriate)

by top-slicing DFG budgets to allow associations to manage the adaptation process themselves. This would free up local authority staff to focus on owners and private tenants who need more support.

- Develop better partnerships to improve adaptation design and the quality of the local construction industry. Home adaptations and home moves for disabled people need to be part of integrated, place-based local health and care planning.

Central government needs to:

- Ensure that DFG resources are allocated transparently and fairly to meet needs – taking account of demand from housing associations.
- End confusion by ensuring that all housing associations make the same level of contribution to the DFG.
- Make sure that the impact of other changes affecting the DFG (the upper limit, means test, Section 36 common parts) are properly taken account of in the national allocation of DFG resources.
- Resolve issues about Section 36 common parts – there needs to be clarity about the responsibilities of landlords, local authorities and tenants.
- The self-financing settlement for the council stock also needs looking at to make sure it is properly resourced.

Homes England and the Housing Regulator need to think about:

- How the new inspection regime could incorporate issues that affect disabled and older people - perhaps by replicating the Audit Commission short notice inspections from over a decade ago.

Ombudsman services need to:

- Work together to look at systemic issues around home adaptations. Disabled people are a very broad group all dealing with their own individual issues. Many problems may not reach the Ombudsman. It is hard to query your landlord's decision or make a complaint if you are ill, in pain, depressed, lack confidence, find it hard to communicate, or at a crisis point with your condition.

This research had limitations. It is based on surveys, interviews and discussions with people working mainly in the home adaptations field. It did not involve other staff such as those in void teams or responsible for home moves. The biggest gap is that it did not include any consultation with tenants themselves, although it does refer to previous work with consumers.

The aim has been to paint a picture of the complex web of legislation and funding, and the different pathways that disabled people must negotiate to get home adaptations. What should be a simple, fast process has become unnecessarily complicated.

It shows how funding arrangements might be improved and the delivery process made quicker and more effective. The overall aim should be to develop an inclusive and flexible housing stock able to meet the needs of the considerable and growing numbers of tenants of all ages who are disabled or have long term health conditions.

Hopefully it provides the background to allow associations to sit down with their disabled tenants and start planning ways to make services work better.

The full list of recommendations can be found at the beginning of this report.

Report Images

With special thanks to the **Centre for Ageing Better** for their image bank showing positive and realistic images of older people in a bid to challenge negative and stereotypical views of later life.

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ABOUT THE AUTHORS

Sheila Mackintosh has been a housing consultant for the last ten years. Prior to this she was an academic at the University of Bristol. Alongside her consultancy she was a Research Fellow in the Centre for Public Health and Wellbeing at the University of the West of England and is now a Visiting Research Fellow. She was the co-author of the previous guide to housing associations and home adaptations and was a member of the team that carried out the DFG Review in 2018. She has worked directly with local authorities and housing associations to set up adaptation agreements and improve DFG services. She has published numerous reports and articles on the DFG, adaptation agreements, home improvement agencies, house conditions and how to integrate housing with health and social care.

Rachel Frondigoun has worked within the 'DFG world' for over 25 years. She has worked in both 'in-house' and external Home Improvement Agencies and within Local Authority Housing Strategy departments as the DFG budget holder working with an external HIA provider. Rachel moved into the private sector in 2014 and since then has been interim Team Leader for different DFG services and developed the business case for the establishment of an Integrated Discharge Team in a Greater Manchester Hospital, as well as provided Consultancy services into the sector from both a policy and practical Best Practice perspective. Rachel has also worked within Bid Development and understand the commercial element of DFG delivery for providers. She went self-employed in 2018 and is since then has worked with over a dozen local authorities and HIA providers both independently and in partnership with Foundations to support Best Practice and has delivered multiple training courses to HIA and OT services around good adaptations design and DFG delivery.

APPENDIX A



LANDLORD APPLICATION FOR DISABLED FACILITIES GRANT

In these instructions and the accompanying form and notes, “the Act” means the Housing Grants, Construction and Regeneration Act 1996. The Act has been substantially amended by Schedule 3 to the Regulatory Reform (Housing Assistance) England and Wales) Order 2002 (S.I. 2002/1860). Unless otherwise stated, all references are to sections of the Act.

The Council is under a duty to protect the public funds it administers and to this end may use information you have provided on this form within the authority for the prevention and detection of fraud.

This is the form to use if you are making an application under Part 1 of the Act for grant towards the cost of works required for the provision of facilities for disabled persons in a house, a flat, a qualifying houseboat or a caravan, or in the common parts of a building containing one or more flats. (Notes 6, 6A and 68 give further information) about the meaning of flat, qualifying houseboat and caravan).

This form is for Landlords applying for this grant.

Please tick boxes where appropriate and when you have completed this form please send it to:

INSERT CONTACT DETAILS & ADDRESS OF AUTHORITY

N.B. DO NOT START WORK ON THE PROPERTY UNTIL YOU HAVE RECEIVED APPROVAL, OTHERWISE FUNDING WILL BE REFUSED.

Part 1 – Preliminary and General Information

Please answer each question unless directed elsewhere.

If a question does not provide enough space for your answer, please continue your answer on a separate sheet of paper and mark the sheet with your name (or, in the case of a joint application, with all the applicants' names) and the question number.

Please make sure you enclose all additional sheets with your application.

1.0	Work Required	
1.1	Details of Housing Association or Limited Company	
	Full name of organisation	
	Business Address	
	Contact Name	
	Telephone Number	
	Email Address	
1.2	Details of disabled person	
	Title	
	If other, please specify	
	Full Name	
	Date of Birth	
	Disability	
	Ethnic origin	
	Contact phone number	
1.3	Property details where works are to be carried out	
	Full Address	
	Post Code	
	Tenancy start date	
	Property Type	
	If other, please specify	
1.4	Are the works to a communal area?	
1.5	Do you own the freehold or leasehold of the property?	

Part 2 – Additional Information

Please submit the signed Owners Certificate with your application.

Checklist:

Before you return this form please ensure you have:

1. Answered all the questions that apply
2. Signed the form (please read the declaration carefully)
3. Enclosed all the required documentation with your application

Declaration for an application made by a Housing Association or Limited Company

- I declare that the information I have given is correct and complete, to the best of my knowledge.
- I agree to the Council making enquiries to check the information I have given. This may mean contacting other Government agencies.
- I understand that if I give false information I may be prosecuted.

Please print name	
Position held in company	
For (Company Name)	
Registered Address	
Post Code	
Signature	
Date	

Part 3 – Owners Certificate

To [insert council name]:

In connection with the application dated [insert date]:

For a disabled facilities in respect of [insert property address]:

1. I Hereby Certify that I [have acquired] / propose to acquire] a qualifying owner's interest in the dwelling.
2. I intend that the disabled occupant will live in the dwelling or flat as their only or main residence throughout the grant condition period or for such shorter period as their health or other relevant circumstances permit. Should the disabled occupant cease to occupy the dwelling or flat, I will endeavour to ensure that future tenants are allocated the property based on their need for such an adapted property, wherever possible.
3. I intend that in future as far as is practical the property will remain occupied by persons requiring the same level of adaptations.

Signature:

Date:

Please Print Name:

Address:

Postcode:

APPENDIX B: USEFUL RESOURCES

Tenants

- **Equality and Human Rights Commission (2018) Housing and disabled people: your rights.** <https://www.equalityhumanrights.com/en/publication-download/your-rights-accessible-and-adaptable-housing-england>.
- **Equality and Human Rights Commission (2018) Making changes to your home because of your disability.** <https://www.equalityhumanrights.com/en/publication-download/making-changes-your-home-because-your-disability>.
- **Make Things Right - for Social Housing Complaints.** <https://socialhousingcomplaints.campaign.gov.uk/>.

Housing associations and local authorities

- **Equality and Human Rights Commission and Habinteg (2018) Housing and disabled people: toolkit for local authorities in England – allocations.** This toolkit allows organisations to review the information and support offered to disabled housing applicants. It is aimed at leaders and practitioners in housing, social care, housing strategy, access officers and tenant engagement teams. <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-allocations.pdf>.
- **Equality and Human Rights Commission and Habinteg (2018) Housing and disabled people: toolkit for local authorities in England: planning for accessible homes.** This provides an overview of and assistance in the planning of accessible homes for leaders and practitioners in planning and housing strategy. <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-local-authorities-toolkit-england-planning-accessible-homes.pdf>.
- **Scottish Federation of Housing Associations (2020) Inclusive Living Toolkit.** <https://www.sfha.co.uk/mediaLibrary/other/english/67155.pdf>.



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