



**Comisiynydd  
Pobl Hŷn  
Cymru**  
**Older People's  
Commissioner  
for Wales**

# **Time to Adapt:**

**Examining waiting times for  
Disabled Facilities Grants  
in Wales**

**An independent voice and champion  
for older people**

# The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people throughout Wales.

**The Commissioner wants Wales to lead the way in empowering older people, tackling inequality and enabling everyone to live and age well.**

## How to contact the Commissioner:

The Older People's Commissioner for Wales  
Cambrian Buildings  
Mount Stuart Square  
Cardiff  
CF10 5FL

Phone: 03442 640 670

Email: [ask@olderpeople.wales](mailto:ask@olderpeople.wales)

Twitter: [@talkolderpeople](https://twitter.com/talkolderpeople)

Website: [www.olderpeople.wales](http://www.olderpeople.wales)

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# Introduction

Our homes play an important role in our lives, influencing everything from our health and wellbeing to our independence, to our feelings of safety and security. But more than that, our homes also connect us to our loved ones, to our communities and are fundamental in enabling us to live and age well.

As we get older, we may find that our homes no longer fully meet our needs or may even present potential risks to our safety, an issue highlighted in recent polling undertaken by the Commissioner which found that nearly 1 in 5 people aged 60+ have difficulties getting around their homes, such as with stairs or bathroom facilities.

Home adaptations are often crucial to ensure that older people can remain living at home (if they wish to) or can return home following a stay in hospital or a care home.

Adaptations are also crucial to prevent accidents such as falls, which can cause serious injuries, and to ensure that home environments meet people's needs in terms of accessibility, mobility and care delivery.

Where adaptations are determined to be minor, these are often funded locally and completed by community-based organisations such as Care & Repair Cymru. If larger works are required, they may be funded by Disabled Facilities Grants (DFGs).

This process typically involves an assessment by an occupational therapist (often referred to as an 'OT') to confirm that the proposed adaptations are necessary and appropriate, followed by a means test (for adults), submission of a formal application with plans and cost estimates, and approval by the local authority before works can begin.

Given the importance of home adaptations to support older people's safety, independence and quality of life, it is essential that any required works are identified and completed as quickly as possible and that older people are supported throughout this process.

However, many older people across Wales have shared their concerns and frustrations with the Commissioner about the amount of time it can take for home adaptations to be made, particularly when involved in the DFGs process, and the impact of this on their lives.

Older people have shared examples of being unable to undertake basic tasks such as washing themselves or being unable to move around their homes safely while waiting for adaptations, forcing them to rely on others for support and reducing their independence. In some cases, prolonged waits have led to older people experiencing falls or suffering injuries, which not only bring significant personal costs to individuals, but also create the need for costly health and social care interventions that could have otherwise been avoided.

Alongside this, many older people have told the Commissioner that the process itself is complex and confusing, leaving people feeling stressed and overwhelmed at a time when they are already dealing with declining health or managing caring responsibilities.

These issues have also been highlighted by a organisations, services and community groups working with and supporting older people that the Commissioner has engaged with across Wales.

She was therefore keen to examine these issues in more detail, with a particular focus on understanding the extent of the timescales older people in Wales may be facing for home adaptations through the DFGs process and potential reasons for delays, to help identify where improvements are needed and the action needed to deliver them.

To enable this, the Commissioner wrote to local authority chief executives across Wales in July 2025 to request information on the following:

- **End to end waiting times from a customer perspective**
- **Demographic data on DFG recipients (age, gender and ethnicity)**
- **Views on barriers and challenges relating to the DFG system**
- **Views on how the DFG process could be made more efficient or effective, particularly in reducing waiting times and improving the overall customer experience**
- **Examples of local good practice**

The information provided by local authorities forms the basis of Part 2 of this report and has been used to shape the recommendations for action to address key issues and improve older people's experiences, which are included within the final section.

**The Commissioner would also like to thank Care & Repair Cymru for their support in enabling the publication of this report.**

# **DFG delivery in Wales:**

## **Legislation, policy and performance**

# Disabled Facilities Grants (DFGs)

DFGs are mandatory grants<sup>1</sup> available to help people to remain living safely and independently in their own homes. Local authorities have a duty to provide DFGs, which are available to people living in all housing tenures, including owners, council tenants and housing association tenants.

DFGs are means tested, with the current maximum grant available in Wales currently £36,000 (less any means tested contribution). Applicants at or below the threshold for means tested benefits do not have to contribute, while those on low incomes contribute small amounts. Individuals on higher incomes must often meet most or all the cost of works.

There is a two-stage approach to determining eligible adaptation works within the DFG / adaptations system:

- Determining what works are **‘necessary and appropriate’** to meet an individual’s needs – assessed by local authority social care (via social services occupational therapy teams)
- Determining what works are **‘reasonable and practicable’**, which results in a schedule of works being sent to the applicant that forms the basis of grant aided work.

Local authorities do not receive ringfenced funding for DFGs. Instead, they make their own local decisions about how much funding they put into DFGs from their general budget.

DFGs are subject to statutory timescales, which set deadlines for local authorities to determine applications once they are formally submitted. Specifically, authorities must decide applications within six months, and approved works should normally be completed within 12 months of approval.

These legal timescales, however, apply only from the point at which an application is formally submitted and do not reflect the full end-to-end waiting times often experienced by applicants.

In practice, the overall process – including initial enquiries, occupational therapy assessments, means testing, and procurement – can take significantly longer than these statutory periods alone.

Additional legislation provides local authorities with greater flexibility and wide-ranging powers to supplement mandatory DFGs at their discretion. This could include topping up grants over the maximum limit, introducing a local means test for particular groups, or providing minor cost adaptations outside of the DFGs system.

Local authorities in Wales determine their own priorities for using these powers, and the amount of finance they allocate to support this. This means that in practice, different types of assistance, with different emphases, have evolved in different local authorities, as evidenced by the responses to the Commissioner’s request for information in July 2025 and explored more below.

Alongside DFGs, which only account for 55% of the overall adaptations budget in Wales,<sup>2</sup> there are a number of other funding streams that support the delivery of home adaptations (often small or medium works), such as ENABLE, the Rapid Response Adaptations Programme (RRAP) and the Physical Adaptations Grant (PAG).

The level of service expected from all providers involved in delivering housing adaptations is set out in the Welsh Government's Standards of Service for Housing Adaptations, published in 2019.<sup>3</sup>

The Standards include information on how providers should communicate with service users, the expected quality of services and equipment, and what eligibility checks are usually required, as well as expected timeframes for the delivery of small, medium and large adaptations.

Further information about home adaptations funding streams and Service Standards in Wales is available in Appendix 1.

## Snapshot of DFGs and home adaptations spend and performance data in Wales

While a range of performance measures and indicators have been introduced (and withdrawn) over the years as systems have developed and evolved, data relating to DFGs and home adaptations remains relatively limited, both in terms of what is recorded and how frequently data is published.

However, the Welsh Government does capture certain data relating to DFGs via annual returns from local authorities (focused on the number of completed applications and costs), the most recent of which is from 2023/24.<sup>4</sup>

Some additional data on housing adaptations more generally is also captured from local authorities, housing associations and Care & Repair agencies via survey returns as a result of standardised reporting regulations.<sup>5</sup> The Welsh Government last published this data in 2020/21 in the form of a high-level analysis.<sup>6</sup>

The main findings from the data are summarised below:

### 2023/24 Data:

- 4,595 mandatory DFGs were completed in Wales during 2023/24.
- £44.3m was spent on mandatory DFGs across Wales, an increase of 25% compared with the previous year.
- DFG expenditure in Wales during 2023/24 was the highest reported in the past 10 years, exceeding pre-pandemic levels.
- The average spending per mandatory DFG was £9,600, an increase of £700 compared with 2022/23.
- Average expenditure varied from £7,200 (Caerphilly) to £13,300 (Monmouthshire).
- £3.4 million was spent on non-mandatory DFGs (grants that are not legally required that are offered at the discretion of local authorities to help fund adaptations beyond the mandatory scheme), a 62% increase compared with 2022/23.

## 2020/21 Data:

- A total of 31,263 home adaptations were completed during 2020/21.
- Predicted outcomes for adaptations included preventing falls (42%), increased independence in daily living (34%) and facilitating hospital discharges (11%).
- 98% of those who provided feedback were satisfied with the adaptations to their homes.
- Care & Repair agencies delivered 67% of adaptations, while local authorities accounted for 26%.
- Average delivery times for small, medium and large adaptations were 7 days, 159 days and 391 days respectively.
- Total spending on adaptations across Wales during 2021/22 was estimated to be approximately £60 million.
- Median costs for small, medium and large adaptations were £117, £3,840 and £16,237 respectively.
- 80% of adaptations were funded by sources other than Disabled Facilities Grants (e.g. Rapid Response Adaptations Programme).
- Only 2.5% of homes adapted were in the private rented sector, despite this representing 13% of Welsh housing stock; 80% were delivered in owner-occupied homes.

While the data highlighted above provides some helpful insights, several reviews have highlighted significant gaps in the information that is collected and published, and the ways this restricts opportunities for scrutiny and to learn from people's experiences. These issues were highlighted strongly in a report by the Auditor General for Wales:<sup>7</sup>

**“Accountability and transparency in delivery of adaptations have long been poor... The Welsh Government collates some performance data from housing associations and Care & Repair agencies but does not make this information available to the public.**

**“Weaknesses in current oversight arrangements mean that effective scrutiny to understand the efficiency and impact of the ‘whole’ adaptation system is not possible. This makes it difficult to judge how well organisations are performing and the positive impact of adaptations on disabled and older people’s lives.**

**“Monitoring continues to focus too much on the mechanics of delivering adaptations and not enough on impact, wellbeing and the wider benefits of each public body’s investment...”**

Key issues relating to performance data, as well as other important aspects of DFG and home adaptations delivery, that have been identified through reviews and research are explored in the section below.

# Reviewing DFG delivery in Wales

As highlighted above, DFGs play an important role in supporting people's quality of life, a conclusion included in the Welsh Government's ENABLE review of the home adaptations system in Wales,<sup>8</sup> which also noted:

**“[Adaptations] help to reduce avoidable demands on the NHS and social care services. Simple adaptations such as a stair rail or grab rail, which cost relatively little, can prevent falls and serious injuries and significant cost e.g. the £28,000 or so it costs to treat a hip fracture. Such injuries are also a significant factor in someone having to move into residential care.**

**“Adaptations to homes not only prevent emergency or unplanned admissions to hospital but can also facilitate earlier discharge from hospital... to enable them to live safely and as independently as possible.”**

While the importance and benefits of DFGs seem to be well understood across public services, as highlighted by the Auditor General for Wales,<sup>9</sup> a range of research has identified a number of common issues and themes that impact upon the performance of the DFGs system (Appendix 2 provides details of the research reviewed for this section, as well as a summary of key findings from each publication).

## Limited awareness amongst public and professionals

Reports have highlighted ongoing issues in terms of finding clear, consistent and accessible information about the DFGs process, which often means people are unsure what steps they may need to take.

Alongside this, people seem to have been discouraged from seeking support as a result of reports about pressures on public services and perceptions that ‘there is no money’,<sup>10</sup> something that also seems to have made some professionals more reluctant to promote services due to concerns about capacity.

There is also some evidence of limited awareness amongst health professionals about home adaptations and the support available to enable these, leading to potential missed opportunities in terms of signposting and supporting individuals.<sup>11</sup>

## Complexity is a key barrier

Older people and representative groups have reported finding the DFGs system complex and confusing, particularly in terms of different funding streams and how local authorities approach means-testing, which varies significantly across Wales.

Furthermore, liaising across different teams and departments during the DFG process can add complexity and impact upon people's experiences, something that research suggests could be mitigated through a ‘single point of entry’.<sup>12</sup> While this approach has been adopted in some areas, it still has not been adopted consistently across Wales.

## Inconsistent practices lead to different outcomes

Limited guidance for local authorities when DFGs were introduced has resulted in significant variations in systems, policies and approaches to delivering adaptations across different areas, something which has the potential to create unequal services.<sup>13</sup>

There is also evidence that people's access to adaptations is affected by their tenancy status, with private owners often finding it more difficult to find information about adaptations, and facing different costs compared to tenants in social housing.<sup>14</sup>

## Opportunities to reduce waiting times

Waiting times for DFGs and subsequent works have been a key focus of much of the research undertaken to date, with times for assessments from occupational therapists a particular and ongoing issue. Alongside this, there seems to be little consistency in triaging or defining adaptations that are high priority, both of which could help to speed up the process.

Evidence also shows that the use of Trusted Assessors – professionals trained and authorised to assess for small and medium adaptations without requiring an occupational therapist – is still somewhat limited, despite their potential to deliver tangible reductions in assessment waiting times.<sup>15</sup>

Similarly, research suggests that further action to remove small and some medium adaptations from the DFG process entirely, using different funding streams such as the Rapid Response Adaptations Programme (RRAP) could help to reduce waiting times.<sup>16</sup>

## The role of means testing

There is agreement across the research reviewed that the means test relating to DFGs is not an effective way to assess an individual's needs and does not account for the additional costs someone may face when living with a disability or long-term illness.<sup>17</sup>

In addition, wider research also shows that means testing may discourage people from applying with practitioners estimating that up to 30% of potential applicants withdraw as a result of means testing.<sup>18</sup>

It has also been suggested that means testing may also act as a form of 'gatekeeper' that deters enquiries, something that seems to be supported by the view shared by some stakeholders that removing the means test would result in a 'flood' of applications, creating additional pressures on funding and resources.<sup>19</sup>

This view is not universally shared, however, with others arguing that removing the means test would free up resources by reducing red tape and administrative costs.<sup>20</sup>

## Challenges of meeting rising costs and demand

Evidence shows that the budget made available to local authorities to provide DFGs consistently fails to meet both inflationary costs and rising demand, leaving many local authorities struggling to meet people's needs.

In addition to real terms spending remaining static over a period of many years, there also appears to have been little strategic planning or prioritising to ensure that expected increases in demand would be met.<sup>21</sup>

There is wide agreement that the £36,000 maximum grant threshold, which has now been in place for more than twenty years, is too low to fully fund the works required in many cases.<sup>22</sup> While local authorities are able to make discretionary 'top-up' payments to meet costs above the threshold, there is inconsistency in how this is applied, which may mean works not going ahead or individuals having to find extra funding, something that may discourage individuals from applying.<sup>23</sup>

## Managing and measuring performance

Limitations relating to the data captured about key aspects of DFGs and home adaptations have been highlighted across several reviews.

For example, data relating to end-to-end waiting times for DFGs was published nationally between 2006 and 2019 but is no longer available, which means that robust, comparable data on waiting times in different areas is difficult to assess.

Evidence also shows that there are inconsistencies in the ways waiting times are measured by local authorities: some use the initial inquiry as the 'start point' – as set out in Welsh Government guidance – but others start measuring from the point of assessment by an occupational therapist.<sup>24</sup>

While reporting regulations have been standardised to capture key performance and activity data, the indicators used do not capture sufficient information about outcomes or people's experiences, and there is currently no mechanism for the complexity of cases to be recorded. Furthermore, it is important to note that this data was last published in 2020/21 and that the response rate from local authorities and housing associations remains relatively low.

The lack of published data on other funding streams has also been highlighted as DFG data only covers 55% of total adaptation expenditure and only 14% of people who received works, meaning this does not provide a full picture of performance across the delivery of adaptations as a whole.<sup>25</sup>

## Positive practice

Alongside the common issues and themes highlighted above, research has also identified some common practice that has made a positive impact on services.

This includes the use of Trusted Assessors and targeted grant schemes to speed up simpler works; single points of access to navigate funding streams; closer integration of housing and occupational therapy services; and trusted contractor lists and accessible housing registers to improve delivery.

However, these approaches are not applied consistently across Wales, which means that people's experiences may differ considerably depending on where they live.

# **Commissioner's findings**

# Capturing data and information from local authorities

As highlighted throughout this report, home adaptations and DFGs play a crucial role in supporting the health, wellbeing and independence of many older people across Wales. It is therefore crucial to understand how effectively local authorities are meeting their duties in these areas and, importantly, what this means in terms of older people's experiences throughout these processes.

Feedback shared with the Commissioner by older people across Wales suggests that many individuals experience issues when navigating the home adaptations system, particularly where DFGs are involved, or face prolonged waits for works to be completed.

The Commissioner wanted to examine the issues being faced by older people in more detail, given their potential impact on quality of life, but recognised that the data available would have limitations in the insights it could offer into current issues or why they might be occurring.

In order to get a clearer picture of the current situation in Wales regarding DFGs, the Commissioner wrote to local authority chief executives in July 2025 to request the following information:

- End to end waiting times from a customer perspective
- Demographic data on DFG recipients (age, gender and ethnicity)
- Views on barriers and challenges relating to the DFG system
- Views on how the DFG process could be made more efficient or effective, particularly in reducing waiting times and improving the overall customer experience
- Examples of local good practice

Responses were received from 21 out of 22 local authorities. Bridgend County Borough Council failed to provide a response.

## End-to-end waiting times

The time it takes for various stages of the DFGs process to be completed – from identifying the need for adaptations, to making applications, to work being completed – can play a critical role in the outcomes experienced by an older person.

For example, delays could result in someone experiencing a fall or other serious injury at home, or could mean an individual being left with no option but to move into a care home following discharge from hospital.

In order to mirror the approach used in previous National Service Indicators and Public Accountability Measures frameworks (which were used as a basis for waiting times data that was published until 2019) and allow some form of comparison, the Commissioner asked local authorities to include details about the following within their responses:

- Any initial contact centre or triage processes
- Social Services Occupational Therapist assessments
- Time taken to complete preliminary and full means test by the Housing Team
- Time to complete any property survey, issue schedule of work, receive grant application, and issue grant approval (including L.A. Housing Team, third-party agency/architect or Care & Repair agency)
- On site processes including planning application and all building works to the date that all works were certified by the LA as completed

Most of the 21 responses were able to fit their replies into these categories, with some providing a more granular breakdown than others. However, it is important to note the following in terms of a small number of responses received, which highlights some of the inconsistencies in the ways that information is captured and recorded:

- Merthyr provided a single figure in response to the question of end-to-end waiting time, with no breakdown of different stages.
- Powys provided an occupational therapist assessment response of 6-8 weeks, so 7 weeks (49 calendar days) was used.
- Denbighshire did not include any of the processing time before the DFG reached Housing e.g. triage, occupational therapist assessment. For the purposes of this report, the average time of 84 days for triage, OT assessment and onward referral to Housing calculated from the 20 LAs who provided this information, was used for Denbighshire's end to end waiting time.

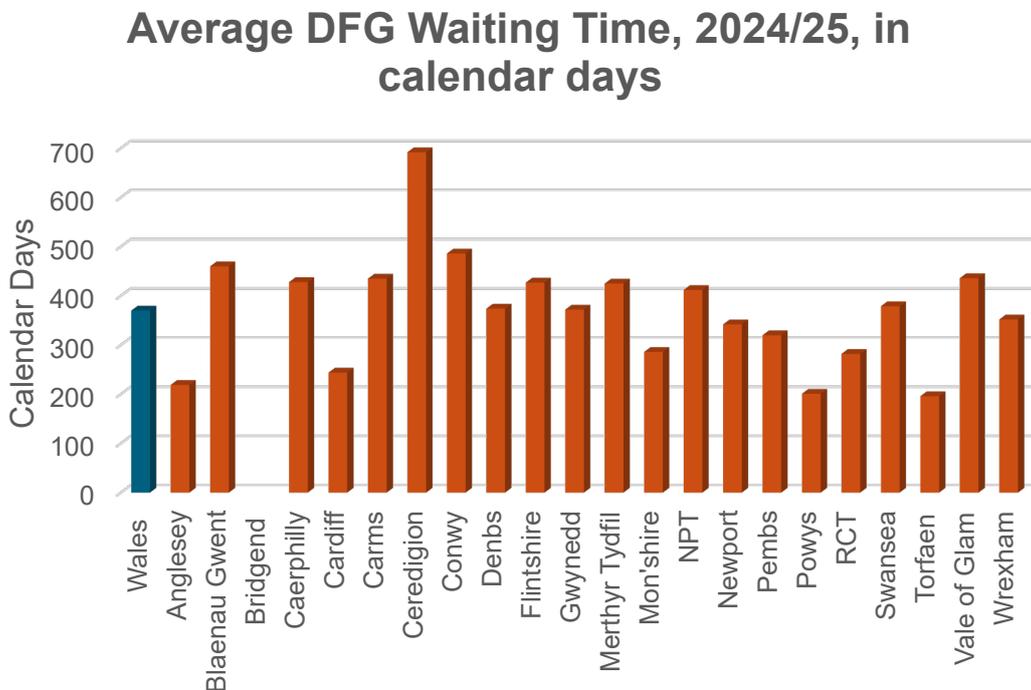
## What the data tells us

Based on the responses received, the average end-to-end waiting time for DFG related adaptations in Wales during 2024/25 was **370 calendar days**.

The shortest average waiting time of **196 days** was reported by Torfaen. Ceredigion reported the longest average waiting time of **692 days**, which was significantly higher than the next highest figure of **486 days** in Conwy (a difference of almost 7 months).

It should also be noted that the information provided by local authorities is based on average figures, which means that there will be some individuals waiting even longer than these figures show.

### Average number of calendar days from first contact to completion of works, 2024/25, for completion of a Disabled Facilities Grant

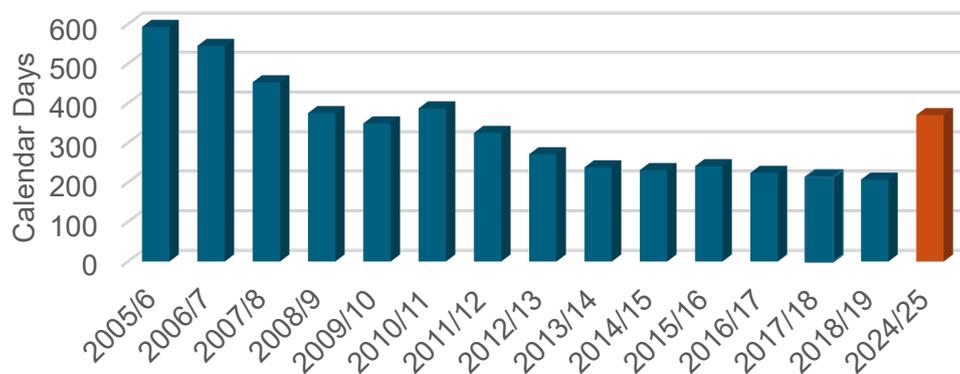


Examining the data shared by local authorities against the data published between 2005 and 2019 shows that the average waiting time for 2024/5 is broadly in line with the average across this period (370 vs 332 days).

However, it is also important to note that while the 370 days figure is significantly better when compared to the years that saw the longest average waiting times of 593 and 545 days respectively, it is still also relatively high compared to the figures of 213 and 207 days at the lower end, recorded in 2018-19 and 2019-20. This represents an additional wait of around five and a half months for the whole process to be completed.

## Change in DFG waiting times between 2005 and 2019, and comparison with 2024/25 data requested by the Older People’s Commissioner for Wales

### Average number calendar days (all Local Authorities) to complete a DFG from first contact with the L.A.



Looking at average waiting times at different stages of the process also provides some helpful insights into why older people might experience prolonged waits or delays.

For example, the data shows that people in a quarter of local authorities in Wales are waiting over three months on average for occupational therapist assessments or referrals.

Delays at this stage, perhaps unsurprisingly, seem to impact on overall waiting times: with the exception of one local authority, those with the longest average waiting times at the ‘occupational therapist assessment / referral’ stage also had the longest waiting times overall.

Similarly, the data received shows that in a number of local authorities (7 out of 22 areas) people are waiting over four months on average for building works to be completed or signed off, compared with far shorter turnaround times in several areas of between one and three months.

Again, perhaps as might be expected (although there are a couple of exceptions), longer waiting times at this stage seem to have a considerable impact on overall waiting times.

# Demographic data

Understanding the demographics of individuals receiving DFGs is crucial to ensure that support is reaching those who need it and that resources are allocated fairly and effectively.

Demographic data offers insights into the barriers that may be faced by certain groups, as well as potential inequalities that can leave people excluded.

Understanding how, and why, certain groups may have very different experiences of navigating the DFGs system is important to support immediate action in terms of outreach and support, as well as longer-term planning to ensure that resources are allocated fairly to maximise their impact.

The Commissioner therefore asked local authorities to provide data on DFG recipients broken down by age, gender and ethnicity. 20 provided this data in full; Neath Port Talbot did not include this data in its response. As highlighted above, Bridgend did not provide a response to the Commissioner at all.

## What the data tells us

### Age

The vast majority of recipients of DFGs in Wales during 2024/25 were aged 60+, accounting for 77% of completed applications. This means that of the 4,032 completed DFGs highlighted in data requested from local authorities by the Commissioner, over 3,100 went to older people.

Looking at specific age brackets, we see that the largest number of DFGs was awarded to people aged 75-79 (19%), followed by people aged 80-84 (14%).

These figures reinforce the importance of older people not being seen as a homogeneous group, recognising that the support needed by someone in their 60s might be very different compared to someone in their late-seventies.

For example, around third of people aged 75+ are not online at all, while many more have limited digital skills, indicating a need for information to be available in paper copies, for example, and ensure 'offline' application processes are available for those who need or prefer them. Some individuals may also require greater levels of support to navigate these processes.

Similarly, it's important to recognise the potential impact that prolonged waits or delays could have in terms of becoming 'deconditioned' as a result of a stay in hospital or a care home if someone is unable to return home safely – something that can happen more rapidly as we grow older.

### Gender

Data about the gender of DFG recipients was provided by 14 out of the 21 local authorities that responded. Of the seven that didn't respond to this question, some advised that this data wasn't collected or available.

The data received highlights that 56% of DFG recipients were women, while 41% were men. 2% were categorised as 'prefer not to say'.

While these figures are broadly in line with the gender balance amongst people aged 60+ in Wales (53% vs 47%),<sup>26</sup> men do seem to be slightly underrepresented.

Given that men are less likely to engage with services – such as health or support services – and may be more reluctant to seek help,<sup>27</sup> this could suggest that there are gaps in how local authorities are reaching out to older men to ensure they can access what they need.

## Ethnicity

14 of the 21 local authorities that provided responses were able to share data on the ethnicity of DFG recipients.

A summary of the data provided by local authorities is set out below:

<b>Ethnicity</b>	<b>Number of DFGs</b>	<b>Percentage of total</b>
Gwyn	1590	76.33%
Asiaidd/Asiaidd Prydeinig	17	0.82%
Du/Affricanaidd Caribïaidd/Du Prydeinig	5	0.24%
Grŵp ethnig arall	5	0.24%
Dim ymateb/mae'n well gen i beidio â dweud	466	22.37%
	<b>2083</b>	<b>100%</b>

These figures indicate that Black, Asian, and Minority Ethnic individuals are significantly underrepresented, comprising just 1.3% of recipients based on the data received, despite representing 6% of the population in Wales.

It is important to note that the 1.3% figure may be an underestimate due to the fact that no ethnicity data was provided by Cardiff, the most ethnically diverse and populous local authority in Wales, and a number of other local authorities.

However, even accounting for the potential impact this might have had on these figures, the proportion of Black, Asian and Minority Ethnic DFG recipients still seems to be concerningly low.

This is likely to reflect the additional barriers that Black, Asian and Minority Ethnic people often face when trying to access services and support, which can include language and communication difficulties, limited awareness of available services, culturally inappropriate provision, and experiences of discrimination or bias that can deter engagement with formal support systems, an issue highlighted in a 2024 report by the Commissioner<sup>28</sup> and wider research.<sup>29</sup>

# Barriers, challenges and improvements: views from local authorities

In addition to requesting the data examined above, the Commissioner asked local authorities to share their views on the barriers and challenges they face within the system, as well as the action needed to deliver change and improvements. The Commissioner also invited local authorities to share examples of local good practice that has made a positive difference to older people's experiences.

18 of the 21 local authorities who provided responses answered these questions, which revealed a number of common themes and issues, as well as some differing views, as highlighted below.

## Challenges and barriers

### Funding shortfalls and fragmentation

DFGs and housing adaptations budgets are stretched, and while funding available through the ENABLE scheme for small and medium adaptations is helpful, this can be insufficient.

Additional 'slippage' funding available through the Housing With Care fund is often allocated late in the year, which means that local authorities are unable to plan or deliver adaptations in time.

### Means testing

Removing the means test for medium works following guidance from the Welsh Government seems to be impacting local authorities in different ways.

Some report that removing the means test has led to increased demand, and the need to fund adaptations even for those who could afford to pay. Others, however, report that removing the means test has led to a better customer experience and shorter waiting times by taking these adaptations out of the complex DFGs process.

There was agreement that the statutory means test for DFGs should be reviewed and simplified, including considering income but not outgoings such as housing costs.

### Outdated and complex legislative and policy framework

The 1996 Act that introduced DFGs is universally viewed as dated, no longer fully reflecting the needs and circumstances of the people it was designed to support.

A lack of all-Wales best practice guidance was also highlighted as a barrier to learning and taking forward improvements.

## **Rapidly rising costs**

Local authorities report that significant increases in costs for materials and labour mean that a growing number of large works are exceeding the £36,000 mandatory DFG cap, with examples shared of costs reaching approximately £80,000 in some cases.

This results in designs / plans needing to be scaled back, redesigned or, in some cases, projects being deemed unviable.

## **Rising demand**

Changing demographics and a growing population of older people, together with changes in policy (such as removing the means test for medium works) have led to increased overall demand for adaptations and DFGs.

## **Contractor capacity and skills**

Local authorities highlighted that there are shortages of surveyors, contractors and tradespeople, particularly locally, reflecting data above indicating there can be long waits at this stage of the process in some areas.

More complex jobs can also require specialist skills, further restricting the pool of contractors and tradespeople available to complete required works.

## **Process and compliance delays**

Bureaucracy relating to procurement and planning legislation (particularly where extensions are being built) can add barriers within the adaptations process that can lead to delays.

Long delays can also be caused by arrangements and agreements required where works may affect utility services or involve building over drainage or sewers.

## **Operational complexities**

Practical difficulties of adapting Wales's ageing housing stock (amongst the oldest in the UK and Western Europe)<sup>30</sup> can add time, complexity and expense to home adaptations and DFGs processes.

There may also be design disagreements between applicants and Occupational Therapists which need to be resolved before works can progress.

## **No standardised performance reporting**

Inconsistencies in performance reporting make it difficult to compare progress across local authorities, identify delays and where they are occurring, or target improvements effectively.

A lack of standardised reporting also limits transparency, oversight, and the sharing of good practice.

## Proposed solutions

As well as highlighting the barriers and challenges explored above, local authorities also shared their views on the action needed to tackle the issues they are facing, make systems more effective and improve people's experiences.

The need for reforming the funding system was emphasised, including increasing and ring-fencing adaptations funding, and raising the £36,000 mandatory DFG cap to reflect inflation.

The importance of enabling local authorities to access the Housing with Care Fund (HCF) was also highlighted as this can currently only be accessed indirectly – limiting planning and timely delivery – as well as the potential to simplify funding routes by merging the HCF with the ENABLE scheme.

In addition, there were suggestions that stock-transfer registered social landlords should be enabled to access Physical Adaptations Grants (PAG), and that repay-on-sale conditions, which allow local authorities to recover grant funding when a property is sold within a specified period, be expanded to allow funds to be recycled for future adaptations

Views on the means test were more diverse, as reflected in the section above. Some local authorities suggested reinstating the means test for medium adaptations to manage demand, while others supported its removal to speed up delivery. There were also calls to overhaul and streamline the statutory means test for DFGs.

The potential to accelerate procurement processes was also highlighted, with suggestions that this could be achieved through national and local strategic frameworks, and an Accelerated Adaptations Contractors Framework – a pre-approved pool of trusted contractors able to undertake adaptations work quickly and at agreed costs – which would simplify procurement and increase capacity.

Similarly, it was suggested that planning and utilities processes could be improved by delegating planning powers for DFGs and establishing service-level agreements with utility providers to reduce delays associated with build-over sewer agreements and connections.

Responses suggested that support at a national level would be beneficial, including refreshed Welsh Government services standards and a new all-Wales Good Practice Guide. Furthermore, additional improvements could be enabled by introducing fast-track pathways for urgent cases, updating legal frameworks where required and exploring ways in which health services and housing services could work together more effectively to support the delivery of the prevention agenda in Wales.

## Good practice examples

The following good practice was shared by local authorities, highlighting examples of action that has made a positive impact and could potentially be rolled out more widely and adopted in other areas:

**Integrated pathways and co-location:** Housing services and occupational therapists work together through joint processes – such as shared visits between Occupational therapists and technical officers, multi-disciplinary panels, and single-point-of-access models – to improve coordination and streamline support.

**Front-door triage and prioritisation:** Early triage is undertaken using Trusted Assessors for non-complex cases, with clear fast-track routes, particularly for hospital discharge and palliative care, and occupational therapist prioritisation processes in place to escalate urgent cases.

**Third sector partnerships:** Work is undertaken in partnership with Care & Repair to support older applicants through the DFG process and to refer small adaptation cases to the Care & Repair Rapid Response Adaptations Programme (RRAP).

**Applicant support and in-house agency/advocacy:** Dedicated customer liaison roles, advocacy and support packages, and in-house grant agency services help guide applicants through the DFG process.

**Streamlined paperwork at assessment:** Occupational therapists complete the DFG application in the home. Early means-test checks and online self-assessment tools are also used to set expectations about means-tested contributions.

**Procurement frameworks and approved contractors:** Approved contractor lists are used alongside automated and digital tendering, direct-award framework agreements (for particular works), pre-set cost bands, and contractor engagement events to streamline procurement and ensure quality delivery.

**Discretionary non-means-tested routes to speed delivery:** Non-means-tested routes are used for small and medium works, including Regulatory Reform Order-based loans and property charges, discretionary top-ups, and the recycling of repaid charges to reinvest in future adaptations.

**Equipment and modular solutions:** Fixed-equipment funding streams, which provide dedicated budgets for standard adaptation items, and modular shower and shower-room pods are used to accelerate installation and enable reuse.

**Using ENABLE/Housing with Care Fund to relieve funding pressures:** ENABLE is deployed for smaller items and to support quicker hospital discharge, while Housing with Care funding is used to help address local budget gaps where successful applications are made.

**Broader housing options:** Relocation is considered where adaptations are impractical or financially unfeasible, with adaptation services linked to accessible housing registers and information sharing with Social Housing Grant programmes to inform future planning.

**Targets and continuous improvement:** Local service targets (e.g. time to technical visit, tendering work) are monitored and ongoing improvements are supported through periodic joint reviews between Housing and occupational therapy, as well as prioritisation frameworks.

# **Conclusions and recommendations**

## Conclusions

The data and information collected from local authorities demonstrates that many of the issues highlighted by research and reviews over a significant period are still present in one form or another, with inconsistencies in policy and practice across Wales.

This means that older people still often find themselves navigating complex systems, as well as facing prolonged waits or delays when they may be vulnerable or in situations where their health, safety and independence is at risk.

It is simply not acceptable that older people in some parts of Wales are waiting almost two years on average for vital adaptations to their homes to be completed at times when these could be critical to prevent injuries, loss of independence, or hospital and care home admissions.

But more than that, older people in these situations are missing out on opportunities to have the best possible quality of life, supported by home environments that meet their needs and offer them choice and control.

It is also concerning that average waiting times in Wales appear to have increased by almost 80% since 2018/19, rising from 207 days to 370 days – an average additional wait of around 5 months.

These figures also highlight another issue relating to severe limitations with the data that is captured and published about home adaptations and DFGs.

As there has been a significant period since the last data on end-to-end waiting times was published, it is not possible to understand whether the figure of 370 days is something of an outlier, or if it represents a trend of waiting times increasing in recent years. Had data been available to enable this kind of scrutiny, there may have been earlier opportunities to identify potential issues that might be leading to delays and take action to address these.

Furthermore, the limited data that is captured provides no real insight into people's experiences or outcomes, meaning opportunities to learn from and respond to these are also limited.

While demographic data broadly reflects population data in terms of age and gender, it is deeply concerning that Black, Asian and Minority Ethnic older people seem to be underrepresented, something that likely reflects the additional barriers that individuals from these groups often face when trying to access services and support.

Wider feedback shared by local authorities also reveals a number of common issues, not only in terms of increased costs and rising demand, but also in terms of the process itself, inconsistencies and a lack of up-to-date guidance.

While there is some good practice underway, overall it seems that too many older people are facing difficulties or delays within a system that appears to be increasingly unsustainable. The reality of this is older people living in homes that may not be suitable for their needs, or may even pose a risk to their safety, leading to hospital or care home admissions, often following an injury or other point of crisis.

# Recommendations

The Commissioner is calling for the following action, based on the findings from the data and the issues highlighted within responses:

## Action for local authorities

- Review data currently captured on DFG recipients to identify gaps in information being collected, particularly equality data to enable improved analysis and reporting.
- Identify ways to capture data relating to people's experiences of the DFG process and outcomes, to support learning and improvement.
- Ensure information about DFGs and the local process is clear and accessible, and easily available in non-digital formats.
- Reach out to Black, Asian and Minority Ethnic older people (as well as organisations providing services or support) to raise awareness about and increase uptake of home adaptations and DFGs, supporting delivery of the commitments within the Anti-racist Wales Action Plan.
- Explore how existing good practice (including examples shared within this report) could be adopted to enhance services.

## Action for the Welsh Government

- Introduce consistent, Wales-wide performance indicators and other person-centred measures, supported by a standardised reporting framework, to ensure robust and comparable data on DFGs and home adaptations. These should be introduced within 12 months of the next Government taking office.
- Publish data on home adaptations and DFGs within 12 months of the previous year end to enable greater transparency, monitoring, oversight and scrutiny, as well as opportunities to identify and respond to potential issues more quickly.
- Commission research to examine Black, Asian and Minority Ethnic older people's experiences of the home adaptations and DFGs process to ensure barriers to access can be tackled.
- Work with local authorities to support engagement with Black, Asian and Minority Ethnic older people to increase uptake of home adaptations and DFGs, contributing to the objectives of the Anti-racist Wales Action Plan to advance equity and tackle systemic barriers.
- Work in partnership with local authorities, housing adaptations service providers, support agencies and older people to develop an updated All-Wales Practice Guide and new Service Standards for Wales.

- Examine ways that the current mandatory grant cap of £36,000 for DFG could be increased.
- Review current means testing arrangements in Wales to understand both the costs and benefits of means testing and ensure greater consistency.
- Ensure that skills gaps that impact upon the delivery of home adaptations and DFGs are reflected in future skills and workforce planning.

**Opportunities to make meaningful progress against these recommendations before May 2026 will be limited due to the upcoming Senedd Election. The Commissioner will therefore work with the next Welsh Government to ensure progress in these key areas.**

## Immediate action

While the action the Commissioner is calling for above will need to be delivered over the longer term, there are also opportunities for more immediate action, using additional funding announced by the UK Government earlier this year.

The Welsh Government should make any consequential funding it receives available to local authorities and third sector service providers to enable them to direct resources at parts of the system where, locally, there are particular issues or blockages.

### **This might include:**

- Increasing short-term capacity to speed-up assessment or planning/approval stages.
- Identifying potentially vulnerable individuals who would benefit from additional support or being fast-tracked through the system.
- Outreach work to engage with groups who are more like to face barriers when accessing services or support.
- Improving local information about home adaptations and DFGs, including providing this in accessible and non-digital formats.
- Improving data captured/undertaking research to provide greater information on local need and where resources should be directed to maximise their impact and reach.

# Appendices

# Appendix 1: Information on Funding Streams and Service Standards

There are a number of different funding streams or schemes in Wales that may be used to deliver home adaptations. Different service providers might be involved depending on whether a resident owns, privately rents, is a Council tenant, or a Housing Association tenant.

## Disabled Facilities Grant (DFG)

DFG is a mandatory grant administered by local authorities which is used to contribute towards the cost of home adaptations. In Wales, a DFG is generally used to fund larger and more costly adaptations. The maximum amount that can be awarded for a DFG is £36,000. The grant is available to people of all ages and in all housing tenures, though people who rent their home will need permission from their landlord before applying.

The DFG is subject to a means test (except where an application for a grant is made by the parent or guardian of a disabled child (under 16) or young person (under 19)). Applicants may therefore have to contribute to the cost of the adaptations. However, in 2021 the Welsh Government directed local authorities to remove the means test for small and medium DFGs as a condition for receiving ENABLE funding.

The statutory framework for DFGs is set out in the Housing Grants, Construction and Regeneration Act 1996. For a grant to be approved, local authorities must be satisfied that the works are “necessary and appropriate to meet the needs of the disabled occupant” and that it is “reasonable and practicable to carry out the relevant works having regard to the age and condition” of the dwelling. Section 23 of the 1996 Act sets out the purposes for which a DFG grant must or may be given. Section 3 of the Disabled Facilities Grants (Maximum Amounts and Additional Purposes) (Wales) Order 2008 adds two additional purposes for DFGs in Wales. A local authority must notify you of its decision to approve or refuse a grant application within 6 months of receiving it. If your application is refused, the local authority must let you know the reasons for the refusal.

## ENABLE

Small adaptations that cost less than £1,000 are usually provided free of charge and without means testing to older people or those who need to make changes to their home because of a disability. Welsh Government provides ENABLE grant funding to local authorities as a flexible resource which can be used to pay for small and medium adaptations.

Some local authorities delegate their ENABLE funding to local Care & Repair Cymru agencies. Local authorities and housing associations may also choose to pay for small adaptations for tenants out of their own funds.

## **Rapid Response Adaptations Programme (RRAP)**

The Rapid Response Adaptations Programme is funded by the Welsh Government and delivered through Care & Repair agencies across Wales.

The purpose of RRAP is to fund quick, low cost, preventative minor adaptations, such as handrails and grab rails, or to enable people to return from hospital to their own homes as quickly as possible, often as part of Care & Repairs Hospital to a Healthier Home service. It is available to owner occupiers and private tenants.

## **Physical Adaptations Grant (PAG)**

Physical Adaptations Grant supports housing associations to meet the cost of making adaptations to properties they own. Funds are allocated to eligible social housing providers on an annual basis, and are used to support medium or large adaptations. In January 2021, it was announced that housing associations had been given control over their PAG budget, “to allow them to take a more strategic approach to adaptations and increase the stock of accessible housing in Wales more generally”.

## **Regulatory Reform (Housing Assistance) (England and Wales) Order 2002**

Local authorities may also use their own funds for home adaptation works. Under the 2002 Order, local authorities can introduce discretionary forms of assistance (e.g. grants or loans) and are able to set their own conditions or financial limits. This might be used to top-up a DFG, or sometimes instead of a DFG.

In addition to the above funding sources, some local authorities and Care & Repair agencies report that they have successfully applied for Housing with Care Fund (HCF) from Regional Partnership Boards to supplement their adaptation spend, although the amount of HCF for adaptations through this route is not readily available.

## **Service Standards**

The Welsh Government has published Service Standards for housing adaptations,<sup>31</sup> which set out the level of service expected from all providers involved in delivering housing adaptations. The standards set out how providers should communicate with service users, the expected quality of services and equipment, and what eligibility checks are usually required. These set out expected timeframes for the delivery of small, medium and large adaptations.

Type of Adaptation	Published expected minimum service standard
<p><b>Small adaptations</b> – i.e. inexpensive items which can be provided quickly</p>	<p>A solution will usually be installed within 3 weeks (if urgent) or 4 weeks (if non-urgent) from date of first contact with the service provider who deemed the adaptation necessary.</p>
<p><b>Medium adaptations</b> – i.e. anything not classed as small or large</p>	<p>Service users can expect to receive an assessment within 2 months from the date of first contact with the service provider.</p> <p>If the adaptation is deemed necessary, a report or referral to a service provider should be made within 2 weeks of the decision.</p> <p>A solution will usually be installed within 4 months (or in line with legislative requirements) from the date of this referral or report.</p>
<p><b>Large adaptations</b> – i.e. works which require specialist assessments, statutory approvals and major adaptations to a property. These include DFG.</p>	<p>Service users can expect to receive an assessment within 2 months from the date of first contact with the service provider.</p> <p>If the adaptation is deemed necessary, a report or referral to a service provider should be made within 2 weeks of the decision.</p> <p>A solution will usually be installed within 15 months (or in line with legislative requirements) from the date of this referral or report.</p>

The Welsh Government also published guidance on DFGs, which was last revised in 2010.<sup>32</sup>

## Appendix 2: Overview Of key findings of housing adaptation reviews in Wales 2005-2025

This section provides a summary of key findings of the following reviews focused on the home adaptations system in Wales:

- The Jones Review, published by Welsh Government, 2005
- CEL Transform, “Review of Progress in Implementing Recommendations on the Provision of Adaptations Services in Wales”, November 2010
- Communities, Equality and Local Government Committee, National Assembly for Wales, “Inquiry”, July 2013
- Government Social Research, Welsh Government, “A Review of Independent Living Adaptations”, January 2015
- Welsh Government, “ENABLE: Support for Independent Living, An Enhanced System for Delivering Home Adaptations”, February 2017
- Wales Audit Office, “Housing Adaptations”, February 2018
- Equality and Human Rights Commission (EHRC), “Housing and Disabled People: Wales’s Hidden Crisis”, May 2018
- Housing LIN and Royal College of Occupational Therapists, “Adaptations Without Delay: A Guide to Planning and Delivering Home Adaptations Differently”, June 2019

Key findings from each report are set out below.

### Jones, “Review of Housing Adaptations Including Disabled Facilities Grants – Wales”, March 2005

- ‘Minor’ adaptations vary by tenure and local authority, from under £350 to under £2,500.
- Maximum mandatory DFG grant amount £30,000.
- Found DFGs in 2003/4 were taking on average 595 days to complete.
- Housing funds 97% of housing adaptations, social services 3% and health 0%.
- All local authorities describe RRAP as “effective and working well”.
- Recommendation to introduce a statutory performance indicator for DFGs.
- Recommendation to introduce adapted housing registers for more appropriate allocation of adapted social housing to people who needed adaptations.

## **CEL Transform, “Review of Progress in Implementing Recommendations on the Provision of Adaptations Services in Wales”, November 2010**

- ‘Minor’ adaptations still vary. £500 limit proposed for PAGs, local authorities use varying costs from £800 to £3,000. Large scale voluntary transfer (LSVT) associations do not have access to PAG and are expected to meet the cost of required adaptations from their own resources.
- Maximum DFG in Wales increased to £36,000 under legislation.
- DFG average times reduced from 545 (2005/6) to 349 days (2009/10). Minor adaptations being delivered outside the DFG system in all but two local authorities, reducing waits from 85 days to 57 days. Non-OTs now being used for some minor works assessments.
- Physical Adaptations Grant spending (Welsh Government funding for Housing Associations) up from £1.5m in 2004/5 to £8m in 2008/9.
- Statutory performance indicator introduced with positive results in raising the profile of adaptations, although some discussion on whether measurements are accurate and appropriate. Already some discussions about moving away from performance indicators.
- All local authorities have an adapted housing register.

## **Communities, Equality and Local Government Committee, National Assembly for Wales, “Inquiry”, July 2013**

- Average DFG waiting time trending downwards, to 325 days.
- Introduction of additional funding streams, taking total to seven.
- Recommended enhanced performance monitoring including time taken from initial enquiry to full completion of adaptation, including DFGs, RRAP, and rehousing.
- Recommendation to make adapted housing registers a statutory requirement.
- Discussions on a single point of entry and spreading good practice where OTs sit in housing teams.

## **Government Social Research, Welsh Government, “A Review of Independent Living Adaptations”, January 2015**

- No clear definition of minor adaptations, ranging from under £200 and as high as £5,000. Workshop recommends that a national definition of £1,000 should be set.
- Review finds fragmented system with multiple points of entry.
- Means-testing thresholds for DFGs varies across local authorities.
- Reports that there are tensions between the desire for a simpler system and the reality of a complex system where additional funding streams, such as RRAP, have been successfully created to take pressures off other parts of adaptation system.
- Proposal of a formal three-tiered system with minor and potentially mid-level adaptations removed from means testing.
- DFGs described as “the primary source of inequalities in the system”.

## **Welsh Government, “ENABLE: Support for Independent Living, An Enhanced System for Delivering Home Adaptations”, February 2017**

- Introduction of Enable, designed to provide simpler and standardised service across Wales.
- Introduces national guidelines around small, medium and large adaptations irrespective of tenure:
  - Small: grab rails, stair rails etc. No required involvement of OT. Up to £1,000
  - Medium: walk-in showers, stair lifts, ramps. Use of Trusted Assessors, some may require means test or OT. Between £1,001 and £10,000
  - Large: requiring major structural changes to a property. OT assessment and expert assistance. Over £10,000.
- No means-testing for small adaptations. Continued means testing of larger adaptations for people who own their own home. No means testing for Register Social Landlords (RSLs).

## **Wales Audit Office, “Housing Adaptations”, February 2018**

- Report is critical of the complex and inequitable system, recommending that the Welsh Government set standards for all adaptations irrespective of geography and tenure. 18 of 22 local authorities reported having revised DFG policies.
- Found that older and disabled people do not always know where to go for adaptations. Recommend a single application form covering all organisations within a local authority and more accessible information.
- Recommended introduction of a formal system for accrediting contractors.
- The Welsh Government should review whether the DFG means test should continue. Only 20 of 22 local authorities fund DFGs in the Private Rented Sector.
- Some Local Health Boards now contribute a little towards adaptations but still lack strategic approach.

## **Equality and Human Rights Commission, “Housing and Disabled People: Wales’s Hidden Crisis”, May 2018**

- Only 15% of local authorities rated the usefulness of the data they hold on who needs accessible homes as ‘good’, and only 26% of LAs commission surveys to understand demand for accessible housing.
- 52% of local authorities cite funding as a major challenge.
- Only 21% of local authorities report they complete an adaptation within 8 weeks. The average wait is 18 weeks (126 days).
- 52% of local authorities use an accessible housing register.
- Only 35% of local authorities feel their housing support services were able to meet demand.

## **Housing LIN and Royal College of Occupational Therapists, “Adaptations Without Delay: A Guide to Planning and Delivering Home Adaptations Differently”, June 2019**

- Suggested moving away from ‘small, medium, large’ defined by type and cost, towards looking at the complexity of the situation. Found that most ‘large’ works were straightforward. Suggested new definitions:
  - Universal (simple, low level)
  - Targeted (straightforward, moderate)
  - Specialist (complex, high risk)
- Believed a more preventative approach to adaptations needed.
- Found social care assessments contributing factor to delays.

## **Research Document, Welsh Government, “A Spending Analysis of Housing Adaptations in Wales”, July 2021**

- 6 of 8 funding streams have a median wait of less than two weeks.
- Average cost per adaptation in RSL is £2,369 compared to £818 in private housing.
- Continued differing levels of spend between LAs:
  - Group 1: over £15,000 per 1,000 persons (Cardiff & the Vale of Glamorgan, RCT, Carmarthenshire)
  - Group 2: £5,000 to £15,000 per 1,000 persons (Newport, Ceredigion, Pembrokeshire, Gwynedd, Isle of Anglesey, Conwy, Denbighshire, Monmouthshire, Torfaen, Swansea, Neath Port Talbot). Within this bracket, all are below £10,000 per person except Newport.
  - Group 3: Under £5,000 Blaenau Gwent, Caerphilly, Bridgend, Flintshire, Powys).
- (Data unavailable for Merthyr Tydfil and Wrexham).
- Recommended publishing data for RRAP and PAG.

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Commissioner  
for Wales**