

**Proposed Response to Communities & Local Government Consultation:
“Disabled facilities Grant Programme: The Government’s proposals to
improve programme delivery”**

Thank you for allowing us the opportunity to comment on the consultation paper that details the government’s proposals to improve the Disabled Facilities Grant (DFG) programme delivery. West Berkshire Council invests a significant amount of money in the provision of DFGs and takes the view that the provision of adaptations are an essential part of promoting independence and improving quality of life for some local residents.

To set the local context, West Berkshire Council approved 136 DFGs in the current financial year (2006-2007), totalling £ 838,123. Around 53% of the applications are received from Housing Association tenants. The majority of the work falls within the £1,000-£10,000 bracket and the average cost of a DFG in the district is £6163. Demographically, the Council is facing an increased demand for DFGs.

The Council agree that any changes to the DFG programme should ensure that disabled people are placed at the heart of the service, with the opportunity to express their needs and choices and influence outcomes. The Council also agrees that the programme should be delivered in a way that it equitable, flexible and easily accessible to those who need it. The Council’s comments to the proposed changes are made below, and have been grouped to discuss key elements of the proposed changes.

1. Extending the Scope: Meeting more needs

The government proposes an increase to the mandatory grant limit from £25,000 to £30,000, with the aim of increasing this to £50,000 if sufficient offset savings can be realised through repayment conditions. In principle, the Council agrees with an increase in the mandatory grant limit to £30,000 as the grant limit has not been reviewed for a number of years and therefore has not reflected increased building and equipment costs.

However, the Council is concerned that should any proposals be adopted to increase the mandatory grant limit, additional resources to reflect the increase should also be made available. Removal of the means test for children has already impacted on tight DFG budgets and increasing the mandatory grant limit would place further pressure on budgets. For example, within West Berkshire, increasing demand has meant that any DFG application that is not assessed as a high priority can be held for up to 6 months before the grant is determined. Even with this tight budgetary control, money has had to be vired from discretionary grant budgets to cover the demand.

The Council is also concerned that repayment conditions would not be sufficient to offset the new grant limits. Whilst we welcome the opportunity to seek

repayment, particularly where the adaptation is such that it may increase the value of the property, for example, an extension, the majority of DFG applicants do not have any short term plans to move house, and over half of our applicants are not owner occupiers at all. Additionally, many of the adaptations we carry out, for example, level access showers and stairlifts, would fall below the £5,000 minimum grant award for which no repayment could be attached. This means that very few grants are likely to be repayable in practice.

With respect to the proposal that there be a mandatory entitlement to ensure access to the garden and other outside spaces, the Council welcomes the proposal but raises the same concern about the additional impact this will have on already limited budgets, and the need to ensure that additional resources are made available to mitigate against the impact.

2. Ensuring clearer priorities and strategy

The Council supports the proposal to issue new guidance to Regional Assemblies to ensure that Regional Housing Strategies have a more explicit policy on adaptations as well as a more strategic and coherent approach to accessible housing. The Council agrees that Regional Housing Strategies should fully and balance the need for accessibility alongside new supply and demolition in meeting the regions housing needs.

Reference to the Housing Market Assessments is made. The Council has recently participated in a pilot HMA for the south East and is of the view that revised guidance would be required if HMA s are to be a valuable source of information to support development of local strategies on accessible housing.

The Council also supports the proposal to issue new guidance to Housing Associations, particularly with a view to reaching agreements with local authorities in relation to major housing adaptations with a view to sharing cost.

3. Faster delivery and simpler access

The Council endorses the need to simply the application process for DFGs, which are currently lengthy and confusing for vulnerable people, and particularly supports the need for a simplified application form.

We support an investigation into new methods for the procurement of equipment and support the use of home improvement agencies (HIAs). However, local knowledge is essential and therefore any proposals for HIAs need to bear this in mind, particularly where proposals are to be developed across local authority boundaries.

The Council would wish to reserve comment on fast track and model delivery systems until guidance has been issued.

4. Working towards integrated services

In putting together this response, the Council held a workshop for Officers involved in delivering DFGs. Strong concern and reservations were expressed over the proposal to redesignate stair lifts as items of equipment to be provided by the Community Equipment Service. In particular, there were concerns over the capacity of this service to deliver these adaptations when their current resources are already under strain. There were further concerns over installation and ongoing maintenance of equipment, as well as concerns over storage and warranties for stair lifts that are to be reused.

5. Changes to the DFG Means Test

The Council is supportive of proposals to improve the targeting of the DFG Means test. The means test is often seen as unfair, and it is very complex meaning that individuals are not able to assess, for themselves, whether they may be eligible or not. The means test does not take into account that the applicant may have equity in their property that they could realise or release, and the notional loan does not take account of whether the applicant has the income to repay the loan or whether they could access it in practice. The DFG means test also differs from other means test used by Social Care to assess eligibility for other services. Linking back to notional loans, the Council raises the question of whether there is an opportunity for a national DFG Loan system to be established?

The Council welcomes the intention to bring the DFG means test in line with the Fairer Charging for Social Care means test, as far as is possible. This will provide for greater equity and a more joined approach in meeting needs.

The Council agrees that the DFG means test does not currently reflect housing costs fairly, and that it can create a disincentive for adults to work. Whilst we agree that average or actual housing costs should be taken into consideration, we consider that disregarding working tax credit and child tax credit may be inequitable to those who fall just outside the eligibility criteria, some of whom may currently have to make a contribution.

The Council's preferred option would be to increase the range of benefits which entitle the applicant to be passported through for automatic DFG assistance, with an income limit imposed on Working Tax Credit and Child Tax Credit.

6. Government Funding for DFG

The Council strongly opposes the relaxation or abolition of the ringfence for DFG. The ringfence ensures a minimum level of funding and requires a further input from local resources as it only meets 60% of overall finances

In respect of option a), the Council believes that it is imperative that any central funding is used for the purpose of delivering mandatory adaptations, particularly as demand for mandatory DFG already exceeds allocated resources. The mandatory DFG criteria could be extended to incorporate home moves where this is more economic than providing an adaptation in the existing home, although local authorities already have the ability to accommodate this policy under their discretionary powers.

In respect of option b), the Council is of the view that if the ringfence is removed, there is a danger that other social care priorities will take precedence to the disadvantage of DFG provision., placing even greater strain on already over-subscribed resources.

The Council strongly agrees that the roles and responsibilities of housing associations should be clarified. Clear guidance is required and the Council would like to see housing associations providing minor adaptations for their tenants, up to a set limit. The Council works very closely with Sovereign Housing Association, who meet all adaptation requirements up to a set limit for their own tenants, contributing, on average, an additional £250,000 towards funding of DFGs every year.. This speeds the process up for those tenants whilst ensuring that Council resources are focused on more specialised adaptations.

8. DFG and Housing Association tenants

The Council supports the removal of Social Housing Grant (SHG) from the National Affordable Housing Programme and the proposal to redistribute it through the central DFG Fund. Not all Housing Associations (e.g. Large scale Voluntary Transfer HAs) are currently able to bid for SHG for adaptations meaning their tenants are disadvantaged.

The Council agrees that there should be a joint approach between Housing Associations and local authorities to provide adaptations and to share costs. The Council would like to see clearer guidance setting out the requirements for Housing Associations to help meet this need, and would like to see an obligation placed on Housing Associations to provide minor adaptations up to a set financial limit (say £2500). This scheme already operates well within West Berkshire with the LSVT Housing Association and demonstrates how a joint approach can benefit all parties.

The Council is concerned that the proposal to have individual Local Agreements with each Housing Association partner may be unworkable and would prefer to see a national or at least regional approach to this. Within West Berkshire, we work with 14 or 15 Housing Associations, whose stock levels vary from 8000 to just 1 or 2 properties. Some of those Housing Association partners work in 30 or 40 Local Authority areas, across different regions. Each Housing Association partner will have its own priorities in respect of stock and the level of energy that they are prepared to commit to a particular area in reaching an agreement.

Locally, we have tried to reach agreements with partner RSLs. Some, like Sovereign, are prepared to offer adaptations up to a certain level, others are willing to make contribution but only where the tenant has no rent arrears or tenancy enforcement action outstanding. To manage multiple agreements, whether from the LA perspective or RSL perspective will be complex and resource intensive. Moreover, adaptations should be provided on the basis of need, and not linked to their tenancy behaviour, which should be addressed through other approaches.