

Appendix 3: Home Adaptations and Assistance Policy Consultation Responses

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| 1 | <p>You may be aware that the UK government commissioned a review of DFG processes in 2018 and a large number of recommendations were returned to the government as identified in the attached summary link. Some of these are recommendations require government ratification but some could be directly implemented by individual local authorities.</p> <p>Do you feel that Herefordshire Home Adaptations and Assistance Policy (HAAP) should include any of these additional recommendations? If so, which ones and how?</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762918/DFG_Review_2018_Summary.pdf</p> <p>https://www.gov.uk/government/publications/disabled-facilities-grant-and-other-adaptations-external-review</p> |
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| Responses | <p>Use of NHS number – we are currently able to upload to Civica for Majors but need to check minors. Would require OT staff to provide the numbers – both minor and major forms would need this adding.</p> <p>Stairlifts under £5,000 – what about the costs of servicing & maintenance? Have fasttrack option for short term use eg for palliative situations – policy says only owner occupied. We still need consent from landlord for RSL ones – is it any quicker doing fasttrack if we still need the landlord consent. Is the rental more expensive than doing just a quick DFG.</p> <p>Who is involved in the partnership agreement – with health and social care – are RSLs involved? Would the RSLs sign up to any additional fasttrack arrangements to facilitate installation, maintenance and servicing? Could be very difficult to practically implement all stairlifts outside of DFG due to service and maintenance issues and landlord responsibilities.</p> <p>Cornwall – no stairlifts go via means test.</p> <p>In RSL – not means tested at all in Wales – different grant PAG – physical adaptations grant. – this helps address some issues around affluency for the population living</p> <p>Query about private rented – mixture of outcomes – should they be paying a contribution to a property they don't own? Either just over or massively over with contribution?</p> <p>If all stairlifts were free – would this be an issue for our local contractors?</p> <p>Justification – falls on stairs can be catastrophic, and costly impact on health and social care budgets. Quicker you can get an adaptation in the better from a preventative point of view. See full review details on this – needs to go along with recycling etc.</p> <p>When people buy their own stairlift they quite often don't pay for curved – leave some stairs at the top or bottom. Palliative lifts – people don't always have the money to pay for the rental – can't afford the £40 per month.</p> <p>Consider the difference it can make to person's life living downstairs with commode pending the installation – due to time taken for means testing. Proof of title can however also cause delays, or consent from landlords/ RSLs.</p> <p>Could we work with the falls service/ hospitals to look at numbers of people currently admitted due to falls on stairs – and whether if this is piloted for a year whether this number decreased? Bristol have tried a similar option before with RSLs – need to consider the impact on the DFG budget.</p> <p>Would the RSLs agree consent for all stairlifts in their properties upfront?</p> |
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Broadly we agree with all of the recommendations listed in this report including:

- Improved promotion of grants and support including promotion through ASC staff and via Housing Providers.
- RRO needs to be adopted as this gives the council the ability to address issues on a wider preventative basis that can't be covered using mandatory DFG and enables us greater flexibility in responding to identified need.
- The policy needs to be updated every 5 years with operating procedures updated annually which reflect changing legislation / best practice etc.
- Support the recommendation that the current 30,000 limit is to be increased in line with inflation.
- Agree that 1% of the total fund should be used for service transformation.
- Re: means testing any simplification / streamlining of this process would be welcomed.
- Agree that a new allocation formula should be established for the next comprehensive spending review in order to ensure consistency of approach.
- We support the recommendation that the services and charges order list is updated to include support with moving and that this explicit.
- A national accreditation scheme should be supported for builders and trades people.
- Agree that further research and consultation is needed with RP's and private landlords; anything that can be done to better understand need / future demand is positive.
- Agree with the recommendation for measuring outcomes.

Yes: alignment of DFG means testing,
Maximum amount of "standard" DFG funding is raised above the £30k limit

All DFG works to be zero rated for VAT

Citizen support the inclusion of these additional recommendations to improve coordination and ensure a more collaborative approach to decision making. We believe these proposals would encourage and support a more holistic and joined up approach between health, social care and housing and deliver better outcomes for Herefordshire residents.

There should be a more joined up approach with housing within LA's
Use DFG money to enable applicants to move to more suitable, possibly adapted properties. This may achieve better long-term outcomes for clients. Teams dealing with DFG money spend should work closely with strategic Housing who also look to work with Housing Solutions Services around the AHR and how the client's needs are met – is there an element of working together when Strategic Housing commission a property for an individual need?

Has there been a review locally around the reasons for applicants 'dropping out' following their initial approach for assistance. Is this purely due to financial restraints or is the need of the individual too high?

We are happy with the provision in the policy however we would support the recommendation of an indexing increase to the maximum grant limit of £30,000.

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| 2 | <p>With regards to the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) – Are there any other forms of assistance under the RRO that stakeholders feel should be included in the policy https://www.legislation.gov.uk/uksi/2002/1860/article/3/made</p> |
| Responses | <p>Purchase of permanent accommodation for people living in temporary or no accommodation – does this meet the RRO requirements.</p> <p>For the purpose of improving living conditions in their area, a local housing authority may provide, directly or indirectly, assistance to any person for the purpose of enabling him— (a)to acquire living accommodation (whether within or outside their area); (b)to adapt or improve living accommodation (whether by alteration, conversion or enlargement, by the installation of any thing or injection of any substance, or otherwise); (c)to repair living accommodation; (d)to demolish buildings comprising or including living accommodation; (e)where buildings comprising or including living accommodation have been demolished, to construct buildings that comprise or include replacement living accommodation</p> <p>No</p> <p>We support the proposed assistance and suggest below for further consideration:</p> <ul style="list-style-type: none"> • Property repairs and replacement of fixtures/fittings • Remedying of Category 1 hazards, including work to reduce the risk of falls • Energy efficiency measures to promote warm homes • Security measures • To fund works not eligible for a Mandatory Disablement Facilities Grant but would help prevent hospital or care admission, speeds up transfers of care and/or save money elsewhere in health, social care and/or education system • Additional work to facilitate work required under a Mandatory Disablement Facilities Grant (DFG) but which is not eligible for Mandatory DFG funding. This will enable extensions and complex adaptations to go ahead, to support families to continue to care for disabled adults and children in their own homes • Work to make a home dementia-friendly <p>We are happy with the provision in the policy.</p> |
| 3 | <p>H.H.S.R.S. – Are our protocols and pathways clear in reference to links with other organisations with regards to the responsibilities under the Housing Health & Safety Regulations? (https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-guidance-for-landlords-and-property-related-professionals another link – PW to provide) Are the links to other agencies and teams clear and is it comprehensible as to how the policies are implemented ?</p> |

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| Responses | <p>HHSRS is straight forward – need clarification around how we work with social care staff and environmental health. Not reporting these on Civica as yet. Have access to a generic template but not from Civica at present.</p> <p>Whilst there is an informal agreement that HIA would deal with private properties this is not written down in the policy. We also don't have powers to enforce. Complex cases with various solicitors involve are challenging with regards to who does what and who reports to who. One case had to be off policy due to lack of ability to means test due to no deputies.</p> <p>It would be good to link to this report in the new policy, or add it as an appendix.</p> <p>N/A</p> <p>We suggest the proposed draft needs to be clearer in setting out the council's statutory duty to keep the housing conditions including HMO's in their area under review and to inspect a property if they considerate appropriate to do so. This may be documented elsewhere. We are unsure if you are proposing to delegate this duty to the HIA</p> <p>We are happy with the provision in the policy.</p> |
| 4 | Does the policy as drafted reflect national and local policy? Are there any key issues that have not been identified within the policy that could be addressed? |
| Responses | <p>Are our links with falls reduction and affordable warmth clearly stated? Should the policy be widened to include recommendations around people with learning disabilities and mental health/ dementia care – stress not just about physical disability issues.</p> <p>All Wales Health and Wellbeing Act does exactly this – provision of an adaptation can be provided no matter what the disability. Eg increasing daylight/ lighting</p> <p>Memorandum of understanding between health, housing, social care?</p> <p>Include links to other minimum standards – e.g. RNIB visibly better standards, dementia care minimum spec etc. eg reference that everyone experiences reduction of 30-60% visual acuity between 20-60 years of age. Evidence of why things are recommended as minimum standards.</p> <p>Currently suggests 9 principles – where did these come from and are they still relevant? 18.4 – worth reviewing?</p> <p>There are some other useful reports that could be included e.g. adaptations without delay and Home Adaptions and the Care Act report.</p> <p>N/A</p> <p>We believe the draft policy captures the main areas of national and local policy in these matters. We believe it may be appropriate to link this policy to Herefordshire's wider housing strategy and allocation policies where it supports this work</p> <p>We are happy with the provision in the policy.</p> |

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| 5 | A previous policy decision was not to means test Registered Social Landlord tenants and to instead promote the re-use of adapted properties within reason wherever possible. Do you support the continuation of such a policy? |
| Responses | <p>Sits uneasily due to not a level playing field for everyone. Understand the reasoning but seems unfair. Nothing in writing from RPs to say that they will do their best to reuse properties – only on the application form. Nothing formalised other than that. RPs not assisting in resolving problems at later date. People in private properties may be having to pay more rent than those in social housing but disadvantaged. Not encouraging downsizing. Bigger picture. Could this be challenged legally? People who have undergone RTB likely to have same income still as when in RP property.</p> <p>Where families have taken over tenancies this may mean that the adaptations don't get reused.</p> <p>Plus side – quicker application due to no means test. No proof of title needed either as RP property.</p> <p>Should amendments be made to tenancies of people living in adapted properties. Will RPs actually ensure that they reuse the adaptations – or just still take these out? Would it stop RPs agreeing to some adapts if they had to reuse?</p> <p>Not enough suitable properties for the population requiring accommodation.</p> <p>Careful design could be converted back to bathroom but who would pay for this?</p> <p>If tenants are means tested for RSL adaptations – would the tenant agree to pay? Would it encourage/discourage people to move to an adapted property?</p> <p>No equality between RSLs and Privately rented.</p> <p>Commissioning with sometimes gain agreement from the RP for a large adaptation and support with funding via strategic housing, and obtain written agreement for nomination rights for the property.</p> <p>Yes</p> <p>Yes this is a logical decision and is proven to save time, several LA's take this approach who we work with. At Bromford we promote the reuse of housing stock.</p> <p>We support this continued approach, However, we do believe it is essential for an assessment to be made very early in the process to assess whether the property will remain suitable for the applicant in the longer term as adapting their current home may not always be the best solution – and for the policy to be successful it should be implemented hand in hand with an approach to consider people's wider housing options. It is essential applicants can access independent advice and information on alternative housing options – for example sheltered or extra care housing or moving to a more suitable home.</p> <p>With reusing adapted properties there must be some flexibility in their future use as it is not always possible to find an applicant for the property when it is received, or the applicant requires bespoke adaptations. We also need to fact in the rural nature of the county and that the availability of adapted properties may not be near services/family networks or are in areas where people with disabilities are unwilling to consider. Clear information on allocation policy choices and opportunities needs to be available for applicants so they can make realistic, informed decisions about where they want to live and enable the council to make best use of the social housing stock.</p> <p>No – RP's properties do not always retain adaptations when an occupier has moved etc.</p> <p>Yes</p> <p>I think it entirely reasonable to continue the policy of not means testing those in social housing.</p> |
| 6 | Some authorities provide adaptations without means testing adaptations under £5000, is this something we should consider within Herefordshire? |

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| Responses | <p>Reference question 1. Where would be the cut off – eg with or without agency fee? Evidence from areas that have tried this – does it work or not? Would people be able to get £5k free and then contribute the additional amount? Would need careful consideration about wording – eg under a certain amount or a particular adaptation regardless of cost? Back to need for justification and outcomes to be achieved – need the research to back this up. Also need to consider timescales and practicality – eg if curved lift – this will take 6 weeks anyway for order. Consider criteria in addition – eg palliative care, hospital discharge – reactive and proactive.</p> <p>Yes</p> <p>Would not affect our Social Tenants if no means test required as above.</p> <p>Removing means testing is always welcome and should make decision making faster, easier and flexible. However, this needs to be considered with the overall availability of resources and whether this money would be better spent on providing additional discretionary assistance.</p> <p>No, in the current climate where HC has been asked to make savings this could be an additional source of income</p> <p>As Platform is a Registered Social Landlord and our customers are not means tested this would not affect us. If a review was undertaken and it was ascertained that the majority of customers being assessed passed the means test where the adaptation was below £5000 then this may be a more cost effective approach to take.</p> |
| 7 | <p>With reference to Appendix 1 of the policy, ‘local land charges’ are applied under certain circumstances. Do you think the application of land charges is appropriate within the policy? Are there any circumstances where this may not be appropriate and if so, when?</p> |
| Responses | <p>Can't do land charges on shared ownership/ or RPs. Can only do freehold owner occupiers. Majority of clients are OK with this. Generally DFG landcharges – not particularly controversial. Issue has been with foster carers previously or families with children with poor prognosis where they may want to downsize later. Variation of costs from contractors – sometimes more expensive contractors are the only ones available and this will increase costs and the landcharge. Additional costs of asking the contractors to do the surveys mustn't affect the land charge as we are also charging our 10% fee. Variations to the works can then take clients into land charge situation. Some DFG works do actually add value to the property, therefore introducing the option of not putting on the land charge in the first place may not be financially appropriate. Aim of the land charge is to stop people moving and applying for new DFG. DFG land charge is only repayable if the property is sold within the 10years. Is there clear information about how the landcharge works – eg doesn't decrease over the 10 years – is this local policy or can it be changed? No interest etc.</p> <p>Couldn't find appendix 1. Overall land charges seem like a reasonable way to recoup the funding invested without placing people in financial difficulty.</p> <p>N/A</p> |

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| | Yes |
| | As a Registered Social Landlord we would not accept this. |
| 8 | Typically standard adaptations such stairlifts and ceiling track hoists come with a one year warranty; whilst the current policy allows for DFGs for larger equipment such as Through Floor Lifts to include a 5 year extended warranty. Are there some types of equipment that should come with an additional service contract, (beyond the warranty period) and in what circumstances should this apply? |
| Responses | Need to specify who will pay for servicing and repairs - lots of issues with RSLs refusing to pay for anything, Who checks that the extended warranties and servicing happen – whose responsibility? What about people who need time to learn how to use things, or who have specific issues that mean that they are more likely to have heavy use of the equipment – should this affect whether a warranty is applied and the length? |
| | Yes wherever possible to ensure that they are well maintained. This would increase the lifetime of the equipment for the user and possibly enable the equipment to be re-used once it's no longer needed. This would need to be reflected in the terms and conditions of the grant. |
| | We believe all major equipment (stairlifts / automatic toilets / door openers) should come with a minimum 5 year warranty. Some LA areas offer up to 8 years warranty on stairlifts (although generally this is 5 years where provided). |
| | We support the council's proposed policy not to levy a local land charge on landlords. The draft document refers to appendix 1 fees and land charges, but this doesn't appear to have been included with the attachments sent to us for comment. |
| | Perhaps stair lifts etc. which can be in use for extended periods. It is a saving in the long term to invest in the equipment that is being installed. |
| | We are happy with the provision in the policy |
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| 9 | Do you have suggestions about how we could recycle or reuse more adaptations? |
| Responses | Where would they be stored? Several companies at present doing stairlifts – how would we manage this? Would it come under the DPS? Some parts of the county have partnership arrangement with voluntary organisations who can help with this. Modular type of curved stairlifts that can be reused – about products as well. |
| | Yes. The equipment could be stored and a contract with a local adaptations supplier to overhaul the piece of equipment could ensure the equipment can be used again and would be more cost effective. This would need to be reflected in the terms and conditions of the grant. |
| | As a RSL we always consider best use of our properties and are keen to assist incoming customers in finding the right property, along with having a robust Adaptations Policy to ensure best use of housing stock. |
| | Recycling equipment (contracted?) would be a useful function for LA's to be able to access |
| | Potential suggestions: <ul style="list-style-type: none"> • Make storage and recycling of adaptations as part of the HIA procurement contracts e.g. stairlifts • Consideration of multi-disciplinary matching of people to properties |

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| | <p>Is there the ability to re-use basic items and perhaps offer items that cannot be reutilised up for upcycling projects locally or offer some of the adaptations out locally, at no charge to those who may require low level adaptations etc. what do other local authorities do with such items, are there any national schemes that HC could look to be part of or take inspiration from?</p> <p>Whilst we do not have any specific suggestions we would be happy to discuss the matter</p> |
| 10 | Are there any other areas of technical support that should be taken up with Home Improvement Agency? |
| Responses | <p>General technology – assistance with home hub type things....? Who will support with internet/wifi etc if this is used instead of person being there.</p> <p>Unsure, but seems comprehensive.</p> <p>Unknown (they put this as a response)</p> <p>None</p> <p>There are no areas that we are aware of.</p> |
| 11 | Is the £15,000 a sufficient maximum amount for an Emergency Repayable grant and, should it be available more widely for works other than category one hazards? |
| Responses | <p>Not sufficient for properties with a lot of disrepair. Existing ones have gone over this amount and clients paying additional amount. Quite a few items that are rated not yet cat 1 but could turn into cat 1 at later date – could extend into Cat 2 but scoring would need to be accurate. Structural collapse may not score highly enough to be Cat 1 but can cause a lot of other additional problems.</p> <p>We can't answer this question as we don't know what the average grant request is. Does £15,000 cover all of the work required most / all of the time? Can other funding be secured to support people in these circumstances? If not, then the amount should be increased</p> <p>N/A</p> <p>No comment</p> <p>It should be determined by looking at when this was last reviewed and how other local authorities deal with this matter.</p> <p>We believe that this part of the policy does not apply to Registered Social Landlords therefore we have not commented.</p> |
| 12 | Are there any circumstances in which the Emergency Repayable Grant should be provided without means testing? And if so what are they? |

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| Responses | <p>Reference off policy case – lacking capacity for finances, no deputies and no POA PF. Would need to be very clear about when and how this is implemented. May be that the client clearly has funds, but no one can access these. If works are urgent, would be good to be able to carry out works following best interest decision and the deputy could pay back land charge once available in place. Need process in place, and clarity about who consents to the land charge being placed.</p> <p>Check whether insurances would cover. Grant should be last resort.</p> <p>Yes - Why do we means test it if it's re-payable</p> <p>N/A</p> <p>Any exemptions should mirror those provided for in the exemption of land charges. As previously documented the draft document refers to appendix 1 fees and land charges but this doesn't appear to have been included with the attachments sent as part of this consultation.</p> <p>No, as detailed above HC is looking to make savings</p> <p>See question 11.</p> |
| 13 | Discretionary DFGs – Are there any other circumstances, other than those mentioned in the policy in which this should be offered and is £15,000 a sufficient amount? |
| Responses | <p>Not always sufficient for top ups where extension needed. Eg cost of extensions may be greater than £45k – costs have been £50-60. Suggestion that the discretionary DFG should be up to £30k. Costs of building supplies and housing are increasing at present.</p> <p>Again this is a difficult question to answer without knowing how much the average grant request is. Can other funding be secured to support people in these circumstances? If not, then the amount should be increased to assist people in need as fully as possible. Amount should increase with inflation on an annual basis.</p> <p>None</p> <p>We are happy with the provision in the policy.</p> |
| 14 | Fast Track Adaptations: Are there other items you feel should be included that are not currently mentioned? |
| Responses | <p>Where do the costs for removal come from? Some procedural issues need to be resolved. Issue of storage, maintenance and recommissioning. Land charges? – putting on and taking off – how would this work?</p> <p>No, this seems comprehensive.</p> <p>No</p> <p>No Comment</p> |

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| | It may be appropriate to include the replacement of a previous adaptation (ie stairlift) which is at the end of its useful life and beyond economic repair if it is still required. |
| 15 | The Discretionary Assistance, which is to cover 'one off' circumstances is set at a maximum of £5000 – Is this set at the right level? |
| Responses | Only used once for top up of extension. |
| | Can't answer fully without understanding demand for this and amounts requested. However, we think it should be increased to cover external influences for example Brexit, materials, inflation etc. The new policy should include a better explanation of what it covers. The amount should increase with inflation on an annual basis. |
| | No Comment |
| | We are happy with the provision in the policy |
| 16 | Relocation Assistance – We currently have no take up of this option – how can make this option more attractive? |
| Responses | (paperwork needed!). Lifetime land charge may be putting people off. Should it be 10yrs like the DFG? 3 bed – 250-300k, 2 bed 180-220k. Stamp duty 125k - 5% - approx. £6,250. Suggest increase to £15k |
| | This is not well publicised and needs to be made clearer for what is included in this and how this can be accessed. If it is not being used, then we need to understand why. Is it simply because people don't know about it? Training on the new policy and all that it includes should be offered to council staff via business world. The new policy should be promoted via the CX update and other means to ensure staff get to know about it. |
| | N/A – however my past experience is that this is accessed very infrequently in other LA areas |
| | This should form part of the initial assessment and be discussed by OT's as part of the options appraisal. Often moving to a more suitable property is discussed too late after adaptations have already been proposed and this is too late to meaningfully discuss the option of moving to more suitable alternative accommodation. |
| | Whilst the current policy does not apply to Registered Social landlords it may be more cost effective to extend this area of the policy to cover these instances but without the imposition of a local land charge. |

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| 17 | Is the subsidised 'handy person service' valuable and what should it include/entail? |
| Responses | We don't promote enough. 30 day timescale is too long. Mostly done within 2 weeks. Check already on Wish |
| | Yes it is very valuable service and should also include other minor jobs such as changing light bulbs and strip lighting, basic garden maintenance, eg pathway clearance, changing toilet seats. We would like to see more investment in this area of work as it can be viewed as invest to save. |
| | n/a to Bromford as we carry out our own works, we strongly believe Handyperson services are valuable for home owners. |
| | Yes, studies have shown these types of services are invaluable in maintaining independence and allowing discharge from hospital. |
| | Further consideration and business case to expand services to include paid offer: <ul style="list-style-type: none"> • Odd jobs and small repairs such as putting up shelves • Falls and accident prevention checks and remedial action • Moving beds and furniture • Fire safety work such as the installation of smoke alarms, and electric blanket checks • Home security Improvements • Garden services |
| | Regarding the handyperson scheme, I think that this is a very valuable scheme, not least because it takes away the worry of finding someone trustworthy to do a good job and the fear of being scammed which can make many vulnerable people reluctant to get people in. |
| | We undertake all minor adaptations for our customers therefore we have not commented. |
| 18 | Are there any other comments or suggestions that have not yet been made? |
| Responses | Need all paperwork reviewed and in place before the policy gets signed off. Urgently need FASTRACK paperwork sorted. |
| | No response |
| | No |
| | Should the policy refer to support for carers? Even this was a commitment to refer people to social care for support |
| | Simplify it as much as you possibly can. |
| | We have no further comments or suggestions. |
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