

National Assembly for Wales' Public Accounts Committee - Inquiry into Housing Adaptations

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, the three national park authorities, and the three fire and rescue authorities.
2. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
4. This is the WLGA's submission to the National Assembly for Wales' Public Accounts Committee's inquiry into housing adaptations. The submission is framed around the inquiry's individual terms of reference.
5. Overall, the WLGA welcomes the Auditor General for Wales' report on Housing Adaptations and its recommendations, which provide a useful framework for taking forward adaptations services at a local and national level. Local authorities, and others, will be able to audit their own local arrangements against the issues highlighted within the report and make improvements in line with the recommendations made.
 - **Part 1 of the report** looks at the different funding streams in place for adaptations. **The Auditor General concluded that the current system for delivering adaptations reinforces inequalities for some disabled and older people, and addressing need is complicated by the different sources of funding.**
6. Local authorities have sought to utilise the opportunities afforded by the Regulatory Reform Order (2002) and other legislation and guidance to develop policies and standards that reflect local conditions for each area.

7. However, recognising the complexities of the existing systems, and the differing arrangements relating to each of the funding sources, the WLGA and local authority representatives have been working with Welsh Government officials, colleagues from Community Housing Cymru (CHC), Housing Associations, Care and Repair Cymru and others over the last couple of years, to develop and implement the enhanced adaptations system “ENABLE – Support for Independent Living”.
8. The main features of the enhanced system are that it:-
 - Has a clear identity, operating under a single brand name “ENABLE – Support for Independent Living”;
 - Promotes consistently good services in all areas, but importantly, with flexibility to respond effectively where necessary; and
 - Increases awareness amongst the public, professionals and practitioners of the help available and how to access it.

There is a clear overlap between, for example, the delivery of consistently good services and increasing awareness of the help available and how to access it, and a number of the recommendations within the Auditor General’s report.

9. The report identifies that local authorities in Wales are maintaining funding levels for adaptations through both DFGs funded by General Capital and for local authority tenants funded by Housing Revenue Account expenditure, with a trend of increasing numbers of people being assisted across all routes.
10. The report recommends that Welsh Government sets standards for all adaptations. It could be argued that this could be seen as a further development of the ENABLE scheme and should be welcomed. However, any standards developed would need to be flexible enough to allow for local conditions to be taken into account, and the views of all stakeholders would need to be taken into account in developing standards, including the views of people who have benefited from adaptations, and those who may require adaptations in the future.
 - **Part 2 of the report** looks at the efficiency and effectiveness of the end-to-end process for providing adaptations, from publicising services, to application, assessment, approval and delivery. The Auditor General found that assessment processes are neither streamlined nor efficient and often contribute to delays. **The conclusion of Part 2 is that provision of adaptations to people with similar needs is inequitable because of inconsistencies in how delivery organisations provide services.**

11. There is a welcome focus within the report's recommendations on the provision of good quality and accessible information for all those who may be interested in adaptations. Local authorities regularly review the information that they provide, and the promotion of the ENABLE scheme has provided the impetus for reviews in many areas. However, as the report points out there is room for improvement in some areas and that jointly-produced information can be more effective and comprehensive. The report recommendations provide a useful audit for delivery organisations to review their information on adaptations.
12. The development of a single, common application form for adaptations used by all delivery organisations within an area is worthy of exploration, however, the statutory requirements of the DFG processes may present some obstacles to achieving this simply. There may be merit in undertaking this exercise at an all-Wales level.
13. We welcome the review being undertaken by Welsh Government into the impact of the means test in respect of applications for DFGs. It is important that the review covers all aspects of this impact including value for money, contribution to any delay in the delivery of adaptations, and the effect that removing the means test would have on levels of demand for DFGs and funding availability, etc.
14. The report's recommendations in relation to accrediting and managing contractors involved in the delivery of adaptations are useful for local authorities and other delivery organisations to use when reviewing their existing arrangements. However, there are significant variances across Wales in the availability and capacity of contractors, and local arrangements will need to appropriately reflect this.
 - **Part 3 of the report** looks at the effectiveness of strategic and operational joint working between the various bodies with a stake in delivering adaptations across Wales. **The Auditor General found that public bodies are generally clear on the benefits of adaptations, but partnership working is ineffective to address need.**
15. While highlighting some good examples of joint working between organisations in relation to differing aspects of adaptations delivery and the provision of accessible housing, the report clearly identifies the challenge for organisations in working together to take a strategic view of the use of resources available

across all organisations in delivering adaptations, and to effectively predict future demand for housing adaptations.

16. Ideally, organisations should seek to build on existing opportunities and partnership structures for joint strategic work in this area. However, where these structures or forums do not exist, or have insufficient capacity, there may be a need to create new arrangements that bring together local authority functions with Health bodies, Housing Associations and Care and Repair agencies operating within an area.
17. These strategic arrangements should not exist in isolation, and effective links should be made to other groups and partnerships which would share a focus on the provision of appropriate housing, maintaining independence, promoting health and well-being, etc., for example Regional Partnership Boards, Local Housing Strategy Partnerships, etc. While housing organisations are not currently statutory members of Regional Partnership Boards, their contributions could be a valuable addition, including around ensuring an appropriate supply of purpose-built or adapted housing, contributing to investment decisions and priorities for the Integrated Care Fund, etc.
 - **Part 4, the final part of the report**, considers the robustness of the 68 delivery organisations' systems for overseeing and improving performance in delivering £60 million of annual expenditure on adaptations. Accountability and transparency in delivery of adaptations have long been poor. Despite the different sources of funding for housing adaptations, only performance in respect of local-authority Disabled Facilities Grants is publicly reported. **The Auditor General concluded that public bodies have a limited understanding of the longer-term wellbeing benefits of housing adaptations and there remains significant scope to reform the system to measure and improve equality and wellbeing.**
18. As highlighted within the report, currently, the only public reporting of performance in relation to the delivery of adaptations is in respect of the National Strategic Indicator which measures the average number of days taken by local authorities to deliver a DFG. Clearly, this indicator only relates to the delivery of DFGs and so provides no indication of the performance of delivery organisations around the majority of adaptations being delivered each year. In addition, by reporting on the average number of days taken to deliver a DFG, the current indicator does not differentiate between the scale and complexity of different types of adaptations.

19. Increasingly, local authorities have been seeking to provide adaptations outside the DFG framework, wherever possible, for example by introducing fast-track arrangements for the provision of stair lifts, walk-in showers, etc. The current performance reporting arrangements mean that the improvements in adaptations delivery brought about by these fast-track arrangements are not reflected in the publically available performance information.
20. Local authorities took an average of 225 days to deliver a DFG in 2016-17, compared to 241 days in 2015-16. The performance gap between the best and worst performing authorities, using this average figure, has narrowed substantially over the last 10 years or so and, as suggested by the report, the performance of the “best” authorities appears to have plateaued over recent years suggesting that there may be limited scope for further improvement within the context of the existing DFG arrangements.
21. Through the development of the “ENABLE – Support for independent living” scheme, data is now being collected from a wider range of delivery organisations irrespective of the source of delivery or funding with a view to building a more comprehensive picture of the adaptations delivered and their impact, including customer satisfaction feedback from those who receive assistance. The WLGA, and some local authority representatives have been part of a steering group contributing to the development and implementation of the ENABLE scheme, and are supportive of development of a performance and reporting framework which provides a comprehensive view across all delivery bodies of adaptations delivered and the impact on equality and well-being. However, in developing such a system, it should be recognised that there needs to be a realistic balance between the value of improved performance reporting and any additional burden in data collection and recording.

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