

Key findings report

Cyngor Sir Powys County Council

Housing Services

Support for Independent Living (Adaptations) Policy
Review

Consultation

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Report author : Henk Jan Kuipers
Housing Service Improvement Officer



Yn agored a blaengar - Open and enterprising


Powys

1. Key Findings and conclusion

Those that have responded find the policy easy to understand and support the policy. All stakeholders support the view that the Council will provide small adaptations as quickly as possible. When more costly adaptations are considered the Council will take a holistic view about the longer term suitability of the accommodation to accommodate the needs of tenants, before providing adaptations.

The consultation has raised some policy issues, which have been considered:

Target times

A decision was made to include times that are achievable, so not to raise expectations that cannot be matched. The target time for small adaptations is four weeks, in line with Welsh Government guidance, published in April 2019. The expected time for medium and large adaptations can take up to three months longer. The housing service has now an adaptations co-ordinator to monitor time scales of all adaptations in both private and council housing, chase officers if necessary and report monthly to the senior housing management team. Together with increased OT capacity this should bring the delivery times down within Welsh Government expected targets. The targets in the policy have been amended to WG targets; i.e. 6½ months for medium and 17½ months for large adaptations.

Adaptations for visitors

The previous and proposed policy do not cater for adaptations for regular visitors. Only adaptations for permanent members of the household are provided. The Council appreciates that this may restrict accessibility to visitors and subsequently may impact on the tenant, but needs to live within its means. Projects are carried out on estates to provide more level access for anyone visiting an estate.

Tenant's agreement

The question has been raised if the tenant's perspective is sufficient taken into account for medium and large adaptations. It has also been questioned if all tenants understand the legislation surrounding adaptations and the fact that some tenants will not understand what is best for them from a medical point of view.

In practice there are home visits from both OT and Housing Standard and Improvement Officer. Works are discussed with the tenant, carers and other people of the household that are affected, before the adaptations are authorised and a contractor asked to carry out the works. The high satisfaction rates indicate that tenants are satisfied with the current adaptation service.

It has been considered to issue a letter to the tenant. The tenant would be required to accept the recommended adaptation, e.g. by signing an agreement. This would mean more paperwork and delays in delivery. During the pre-consultation, disabled tenants expressed a concern that if they would have to sign that they agree that the adaptation would address their needs for the next few years, people would be reluctant to get in contact again, if the adaptations turned out not to work as intended.

It is proposed to continue the current way of working where OT and Housing Standard and improvements Officer consult and agree the adaptations with the

tenant, carer and other household members if necessary. The level of information provided will depend on the needs of the tenant, carer and household.

Alternative accommodation instead of expensive adaptations

This consultation shows support to look at alternative suitable accommodation before installing more expensive adaptations. The Council will need to develop a practical support package for tenants if it is agreed a move would be the best outcome. No one can or will be forced to move, but an adaptation will not be provided to the current home if alternative suitable accommodation is available.

Alternative accommodation if adaptation no longer needed

Legislation enables to ask people to move if they are no longer in need of a substantially adapted home. The conditions are that there needs to be another household that needs the adapted accommodation and there is suitable alternative accommodation available.

The Council hopes it would never have to ask people to leave if they don't want to. However in a very limited number of cases, and possibly never, these discussions will have to be had. It would be a balancing act between the needs of the household asked to move and the household in need to move in.

2. Background

1.1. Background to the policy and purpose of consultation

The draft policy is a review of the existing adaptations in Council Housing Policy. It sets out the way the Council supports people that need accessible and adapted housing.

The two main reasons for the review are:

The Welsh Government has published guidance for adaptations, called ENABLE. The policy now uses the same terminology.

Housing staff has asked for a more clear policy that balances the need of tenants with the need of the Housing Revenue Account to provide value for money and effective use of its stock.

The consultation enabled tenant representatives, groups working in the field of disability, housing staff, social services occupational therapists and county councillors to provide comments.

1.2. Background to the consultation and engagement

Prior to the consultation a draft of the proposed standard was discussed with a number of housing and social services staff involved in the delivery of adaptations.

The questionnaire and draft policy was sent for comments to members of the "Breaking down barriers" tenants group. This is currently a group of four tenants that

have volunteered themselves to look at improving access to Powys Council housing services.

The proposed policy together with a summary and a number of questions were sent to the following stakeholders:

- Housing Services Group 100
- Members of the Tenants' Scrutiny Panel
- Twenty organisations active in the field of disability, including Disability Powys, Age Cymru Powys and Credu (carers)
- All Housing Service officers
- Social Services occupational therapists
- All County Councillors

The HSG100 consists of self-selected tenants that from time to time are asked to give feedback on proposals before they are implemented.

The consultation period ran for a six-week period between 21 May and 1 July 2019.

1.3. Response rate

Seven completed questionnaires were received.

Four responses with comments were received, without completing the questionnaire. Two meetings with local access groups took place.

1.4. Profile data

Housing staff	6
County Councillor	3
Social Services staff	1
Council Tenant	1
Housing Services Group 100 / Tenant Scrutiny Panel Member	1

In addition to the above members of the "removing barriers group" have engaged verbally and there were meetings with two local access groups, which include Council tenants.

Currently satisfaction of Council tenants is monitored after completion of adaptations in line with Welsh Government ENABLE requirements There was a very high satisfaction rate of 99% for 2018/19.

1.5. A note about market research and consultations

When conducting market research, a margin of error and confidence level is used to ensure that the results are robust and representative of the population they are seeking views from.

This consultation however, isn't market research as people choose to respond and are not contacted using a sampling methodology. People self-select, so sometimes

when conducting a consultation, only the views of the people who are either strongly in favour or strongly object to a proposal, are heard. The silent majority may not have given a view.

When conducting consultation exercise Powys County Council works to the National Principles for Public Engagement in Wales:

<http://www.participationcymru.org.uk/national-principles>

3. Question by question analysis

Question 1: Are there any other ways to meet the independent living needs of tenants which should be included in the policy?

Yes	3
No	1
Blank	3

Comments made

Yes. The needs of carers. Adaptations should be carefully discussed with the whole household and delivered to ensure good quality standards which can be used in the future.

Yes. Timescales for adaptations to be carried out. Council adaptations to properties seem to take longer than any others.

No. Nothing formal needs reinforcing. The counselling of prospective tenants would benefit from more time being allocated and consideration should be given to whether that needs to be formalised.

Blank. It is imperative the authority considers now the future demand on this type of accommodation and to start building more 1 and 2 bedroom bungalows and blocks of flats to meet our growing aged population.

Response

Under 2.2. the policy states that an adaptation is primarily to help disabled and/or older people and to support their carers. It also states that the Council will discuss needs with tenants, and any carer working on their behalf, throughout the process. The paragraph states further that adaptations can help carers by reducing the physical demands that they may have to deal with and ensuring their safety whilst undertaking their caring role.

The policy aims to include carers. We think this is sufficient clear in the policy.

Delivery times depend on many factors. It is recognised that there are cases where the provision of adaptations takes longer than desirable. It also needs to be noted that delivery times vary enormously depending on what adaptation is carried out. Small adaptations in private dwellings took on average 83 days in 2018/19; adaptations in private dwellings with a disability facility grant took on average 142

days. Adaptations in Council housing took on average 193 days (this excludes many small adaptations). The target was 180 days. Discussions are ongoing how to improve timescales. An adaptation coordinator is now in position to monitor timescales and chase officers if necessary.

All prospective tenant that indicate that they need adaptations or ground floor accommodation, are assessed by an occupational therapist to assess their needs. Any needs are recorded on the common housing register, to assist with matching the right household with the right accommodation.

The Affordable Housing Delivery Team that is responsible for building new Council housing looks carefully at local needs before developing development proposals.

Question 2: Do you support the policy that only tenants and permanent members of their household are eligible for adaptations?

Yes	6
No	1
Blank	0

Comments made

Yes. However, should a tenant wish to make an adaptation at their own expense for visiting family members this should be agreed in the same way as for a tenant.

Yes. There has to be a benchmark.

Yes. Absolutely. Why on earth should we be paying for adaptations to non-permanent residents

Yes. Budgetary.

No. There may be people living in private owned or privately rented accommodation who's health may change and there is a need for them to look for alternative living accommodation to which they cannot afford in the private sector.

Response

The Housing Service, as a landlord, will not withhold permission unreasonably to any tenant to carry out adaptations to the home. There will be conditions attached to a permission, in the same way as any other improvement carried out by a tenant.

There have been requests from tenants to adapt their home for regular visitors that for example use a wheelchair. However, the Housing Service does need to live within their means and prioritise spending.

Anyone can apply to be registered on the Common Housing Register called "Homes in Powys" or "Tai Teg", regardless of current tenure. The needs of prospective tenants will be assessed to ensure they will move into a suitable home, once they

are the highest priority on the register. Affordability and suitability of the current home is taken into account when deciding on priority.

Question 3: If adaptations are costly, do you think it fair for the council to look at whether there is a more suitable property available for a tenant that will meet their needs?

Yes	7
No	0
Blank	0

Comments made

Yes. If there is no suitable accommodation, should the council look for some financial input into the cost of the adaptation from the tenant? Possible means test?

Yes. Due consideration must be given to ensure that the tenant is not moved to a community or district away from friends and family. It is crucially important for a disabled person to have a network of people who they can trust and interact with.

Yes. One has to consider the tenants needs in say 5 years' time, not just now.

Yes. Most definitely. We should not be throwing money at adaptations. For example, a property may have been adapted some time ago and the person may have since passed away. Although difficult people need to understand a council house is not theirs for life. If circumstances change then they must realise they may need to move to alternative accommodation.

Yes. There is no need to reinvent wheels.

Response

The council will try to balance the interests of all stakeholders. This include the best use of existing adapted accommodation and physical and social needs of tenants.

Question 4: Do you agree with the support that is provided to move if people are advised that is the best solution?

Yes	6
No	1
Blank	0

Comments made

Yes. We should offer support.

Yes. It is adequate.

No. Changes to how applications are made to the CHR (online) disadvantage many of my clients and have caused lots of issues. Also information on how those who cannot access the internet can be supported to apply has been conflicting depending on who you speak to. A clear procedure is required.

Response

The “Homes in Powys” allocation policy states:

“If an applicant doesn’t have access to the internet or can’t find anyone to help them complete an online application, then they can make their application by telephone on 01597 827 464 or contact any of the ‘Homes in Powys’ partners for help and assistance.” If existing tenants are advised to move, they will be supported by their Housing Management & Options Officer.

The respondent has been advised to take up any experienced issues with the policy and strategy officer who is responsible for monitoring implementation of “Homes in Powys”.

Question 5: Do you support the policy that every tenant has to agree before we provide a medium or large adaptation?

Yes	5
No	2
Blank	0

Comments made

Yes. This is a major alteration and financial commitment from the council as landlord. The tenant has the freedom / choice to agree or disagree to an adaptation.

Yes. The tenant is the user of the adaptation and careful consideration must be given to ensure it is right for their needs. However, it should be done in a timely and appropriate manner on both sides because time is of the essence for many people who may be moving from able to disabled and it could be a progressive condition too.

Yes. They have the choice to accept support or not.

Yes. I’m not sure how you could adapt a property without the agreement of all parties.

No. some individuals are not capable of agreeing or understanding what the works entail, hence why an agreement is made with the OT as to whether or not the solution will meet the need (or not), prior to the commencement of works. Also meeting tenant’s expectations is often very difficult. For example, adaptation funding is used to meet the medical needs of individuals; it is not an opportunity to undertake renovations to a specification that far exceeds what is necessary and appropriate, reasonable and practical to meet that need.

No. Powys may have needs the tenant does not fully comprehend.

Response

3.7.e. states that the tenant will be informed of the decision to carry out medium or large adaptations and will be asked to agree with the installation of the adaptations and to confirm that this will address their needs.

Professionals will assess the needs of the household, any carer, the accommodation and take other relevant factors into account, before a final recommendation is made.

The reason to introduce a clause that requires confirmation from the tenant is to make sure that there is agreement about the adaptations. An earlier draft of the policy included that written confirmation from the tenant was needed. Feedback indicated that tenants may be put off by an overly formalised process and disabled tenants indicated that it may put tenants off to come back to the Service if needs change or if an adaptation after all does not work out for the tenant as intended. Therefore the clause now requires that it is checked with the tenant if they agree the proposed adaptation will meet their needs now and in the foreseeable future.

The clause will be changed so that the final recommendation sent to the tenant will ask the tenant to read the proposal and consider if this will address the household's needs.

Question 6. Could the support offered to tenants who need to move, be improved?

Yes	4
No	0
Blank	3

Comments made

Yes. By having a consistent and approved process which is agreed quickly and in the interest of the tenant. It is not clear at present that this is the case.

Yes The practicalities of moving can be very difficult for the elderly/disabled, especially when there is no family support. In my experience this puts people off moving.

Yes. I think many don't want to move because of the burden of informing utility companies, re-arranging insurance, packing, unpacking, the actual move. I think we could offer more assistance, albeit at a cost to arrange the move for them.

Yes. A clear policy on what the tenant will receive. Physical help with moving, moving costs, decoration, carpets, curtains / blinds. This would not only help the transition to move be more palatable, it would also save the authority financially by not having to adapt unsuitable accommodation.

Blank. Should the default be support? Means testing?

Blank. It depends, but if we are desperate for the property then we should do everything practically possible to help them move.

Response

It is proposed to use the decant policy principles for financial assistance. The comments made, indicate that besides financial assistance there will also be a demand for practical assistance to organise a move.

The Service will take the lead in developing a practical support offer for tenants. This may be by the Service itself, through Social Services or voluntary organisations.

Question 7: Do you support the approach that people may be asked to move to make a substantial adapted home available for someone that needs it?

Yes	6
No	0
Blank	1

Comments made

Yes. There is no point in having equipment in a house which is not used. It would also free up a home for someone who is in particular need. However, the general policy should be that homes are accessible to all which will provide better housing, better accessibility and a strategic approach to social housing in Powys.

Yes. Only if they no longer require the adaptation, although a suitable alternative needs to be available. These seem fairly thin on the ground.

Yes. But obviously sympathetically. In many instances it may have been their home for 30 or 40 years maybe more.

Yes. Absolutely, if we are desperate for the property then we should do everything practically possible to help them move.

Yes. Why reinvent wheels.

Blank. Difficult, they can be asked, but it is their home and they can refuse. They could be given incentives for this?

Response

The Council understands it may be difficult for a household to be asked to move. Especially if they have lived there for a long time, or because the person needing the adaptation has passed away or a divorce taking place.

The Council has until now never asked people to move and hopefully never has to. The Council would like to make it clear that in a very limited number of instances it

may consider asking people to move to suitable alternative accommodation if someone needs the adapted accommodation.

Question 8: Are there other relevant aids and adaptations not mentioned in the policy?

Yes	0
No	3
Blank	4

No further comments made.

Question 9: Do you think our policy discriminates or puts a person at a disadvantage compared to another person? In other words, does the policy unintentionally discriminate?

Yes	2
No	2
Blank	3

Comments made

Yes. Only in that there is a need to apply via the CHR, not everyone is able to do that for a variety of reasons. This disadvantages the most vulnerable.

Yes. Private sector (owner / occupiers and private rented tenants) are means tested. Council tenants are not. Tenants should follow private sector in this respect.

Blank. Nothing jumped out.

Blank. I am not sure, impacts are important and if they are carefully measured then this should not happen.

Blank. There is one area where discrimination may happen which is where a tenant is asked to contribute to a high cost adaptation. It is often the case that individuals with a disability are either on a low income or in receipt of welfare benefits. This puts them in the low earner category and could be a barrier to affordability. Can you be assured that the right level of contribution can be made to assist in this instances?

Blank. 7.3 needs to include interpreters and British Sign Language.

Blank. I don't believe it does.

Response

Only prospective tenants need to apply through the common housing register. Existing tenants apply through Social Services' ASSIST. Prospective tenants or people that need to move should be able to register in the common housing register,

regardless of their vulnerability. Applying can be done on line, over the phone or after making an appointment if needed. The Council is of the opinion that there is no discrimination of vulnerable people, but will ask the CHR steering group to monitor equality data.

Adaptations are funded differently for different tenures. Tenants in Powys Council housing are not means tested if the Council carries out an adaptation and adaptations are funded from the Housing Revenue Account. Adaptations in the private sector are means tested if the applicant asks for a Disability Facilities Grant. Until there is a uniform funding system in Wales that applies to all tenures, there will be differences. The Council is of the opinion that there is no discrimination of people that need adaptations in the private sector, as the same support services are available for all tenures and there is financial assistance available for those that are regarded unable to fund their own adaptation.

The Council would only consider to ask for a contribution, where it considers an adaptation not the best option, and a tenant still would like the adaptation. This hardly ever happens. This would be classified as an alteration to the property by the tenant.

Sign language and interpreters will be included in the policy.

Question 10: Do you think the policy for reviewing decisions is fair?

Yes	5
No	1
Blank	1

Comments made

Yes. There should also be a procedure for reviewing decisions.

No. By using this authorities officers there is a degree of perception that it would not be a fair appeal. Have you considered using an officer from an alternative authority? This could be a reciprocal arrangement, say with Monmouthshire, Ceredigion or Gwynedd?

Blank. I'm not too sure how the review policy works.

Response

The Council expects that mistakes will be rectified and that if things are unclear there will follow clarification. However, any policy is open to interpretation and there is an opportunity to have a formal review of a decision by a more senior officer not being involved in the original decision. In the eyes of the Council this will ensure sufficient independency.

Question 11. Overall, please rate how easy or difficult it is for you to understand the policy?

Very easy	2
Easy	4
Difficult	0
Very difficult	0
Blank	1

Question 12: Is there anything you have not yet mentioned that you feel is missing or needs changing?

Yes	1
No	5
Blank	1

Comments received

Yes. Make explicit that eligible works follows that as prescribed under the 96 Act. Adaptations and the time it takes to implement them in void properties should not be counted as part of the void turn-around target time-frames. Where possible adaptations to void properties should be completed BEFORE a new tenancy is taken up and the tenant/s moves in: to speed up the work turn-around on-site (much quicker in an empty property), thus reduces build costs, increases the productivity of the finite number contractors we can use, reduces stress impact on the tenants, would likely reduce complaints freeing up officer time, would reduce the chance of compensating tenants by having to re-do works for example, replacing floor coverings of door-ways widened.

Response

When people are registering with “Homes in Powys”, they are asked if they need any adaptations or level access. If they state they require this, an assessment takes place of their needs. Current adaptations and accessibility, as well as the potential to improve accessibility relatively easy, are recorded on the property management database, when a home becomes vacant.

Prospective tenants are matched with suitable properties and if any works need to be carried out, this will be discussed with the prospective tenant. Some adaptations are easier to carry out immediately than others. Some tenants may be in urgent need to move, others may be able to stay longer where they currently are.

The Council is committed to reduce void times as much as possible, but also committed to provide a new tenant with a home that meets their needs. So, every case will be looked at and a judgement made to carry out works before or after moving in.

The policies enable the above, but it will be in the hands of the officers that are involved with the delivery, to ensure the right outcome.

Additional suggestions made during consultation

Additional suggestions and comments from conversations and other communication are listed below.

- The property classification only makes account of access, not bathing options, level access showers are our most common adaptation.
Response: Adaptations, like level access shower, hoists, stair lift and other adaptations are recorded. It is not only level access.
- There should be more guidance on what is considered cost effective as this is subject to opinion.
Response: The intention of the policy is to ensure all relevant matters are considered before medium and large adaptations are carried out. This should include the needs of the tenant, housing management, property management and financial management considerations. It is expected that the more expensive an adaptation is, the more consideration should be given if it is the most cost efficient way. Officers will need to use their professional opinion and in doubt consult with colleagues or management.
- The need for some adaptation to be recommended by an OT isn't entirely necessary as there are different ranks of OT and hospital staff, for example OT Tech, or social worker for the visually impaired, or discharge officer for example. All of which we may accept adaptations referrals from for medium adaptations.
Response: under 3.7 an addition is made, that recommendations and proposals from other qualified professionals will be assessed to see if a social services OT additional assessment is necessary.
- Section 4.2.j might be illegal if it breaches human rights ? has this been checked.
The policy has been checked. The final version that will be proposed will be checked by the Council's Legal section and Monitoring Officer. Previous advice indicates that if the Council acts reasonable by not providing an adaptation, but offering a suitable alternative, that is legally acceptable.
- Is the provision of medical details necessary as this could duplicate an OT assessment which is enough. This wouldn't be required in the private sector.
- I wondered if something could be added in there regarding the OT passing over some information about a tenant's medical as to why the adaptations are required. The reason for this is so that housing have some sort of audit so that if an adaptation is completed, it would be good to put on the file, the reasons for it. Not a full blown medical history, just the main reasons for the adaptation.
Response: An OT assessment should take relevant medical facts into account. The recommendation should include the reasons for an adaptation. This should not be duplicated. There may be instances where prospective tenants are asked for medical evidence, where no OT assessment is required or available.

- Designated older persons accommodation had permission to automatically swap a bath for a shower on request, is this being carried forwards? Are we negating the need for recs for this in the new policy also?
 Response: in most of the designated accommodation this has happened as part of achieving the welsh housing quality standard or as an adaptation.
- Section 3.3H: Small adaptations are currently carried out by Heart of Wales Property Services (HOWPS). This is not an obligation on the LA and other contractors may be used as appropriate. It may also be worth adding reference to value for money process.
 Response: reference to one specific contractor will be removed. The Council has to provide value for money. There are corporate procedures and guidelines, as well as officers' expertise to ensure achieving value for money. The Council should always take value for money into account for decisions to order works.
- For social housing adaptations we follow the private sector and '96 Act and it's amendments (Housing Grants, Construction & Regeneration Act 1996) for eligible (mandatory) works. I don't think your draft policy explicitly says that. I think it would be a good idea if this is mentioned from the outset as it sets the scene as to what adaptations can/cannot be considered. For example, it was through this we have rejected scooter stores for example.
 Response: the policy touches many pieces of legislation. The choice has been made not to reference specific legislation, but to provide a document how the Council operates. We think that is easier to understand. If challenged the Council may refer to specific legislation. The terms used in the policy are that adaptations need to be necessary, appropriate, reasonable and practicable. This directly refers to the terms used '96 act relating to disability facilities grants.
- From personal experience OTs sometimes, advise to do more work than necessary, without taking notice of the opinion of the tenant. Most tenants may not know what is necessary and not. I think the Council can save on adaptations if they listen better to tenants and perhaps to not carry out adaptations that may be necessary in the future.
 Response: The policy aims to achieve that in the case of more expensive adaptations, all stakeholders are invited to provide their opinion. This includes the tenant, carers and if necessary household members. It is not in the interest of the Council, tenant or OT to provide unnecessary adaptations.

Question 13: Has your household asked for an adaptation to your home in the past five years?

Yes	0
No	7
Blank	0

Currently satisfaction of Council tenants is monitored after completion of adaptations in line with Welsh Government ENABLE requirements There was a very high satisfaction rate of 99% for 2018/19.