

Classification: Open	Decision Type: Key
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Report to:	Cabinet	Date: 15 March 2023
Subject:	Housing Assistance Policy	
Report of	Cabinet Member for Adult Care, Health, and Wellbeing	

1.0 Summary

1.1 Bury currently utilises the Disabled Facilities Grant (DFG) in a traditional way. Additionally, local related guidance, policies and processes have not been updated for a significant length of time. The revised national guidance, changes to council resource along with the development of the Housing for Adults with Additional Needs Vision, Strategy, Market Position Statement and Bury 'Let's Do it' provide the foundations to work collaboratively across health and social care. Along with housing partners, care providers and residents, there is an opportunity to shape processes and pathways, review objectives of DFG usage, adaptations, and refresh the Housing Assistance policy.

2.0 Recommendation(s)

2.1 The recommendations are to:

- Continue delivery of minor and major adaptations for households with additional need and agree to widen use of DFG for residents with additional needs. This includes by delivering:
 - Innovation Grants/ Excess Cold Grants- preventing accidents and hospital admissions
 - Repairs to adaptations- enabling people to stay in their home longer and prevent or delay the need for more costly formal care or residential placement.
 - Minor Adaptations- Fund equipment store to provide larger minor adaptations costing less than £1,000 such as external metal handrails, grab rails and stair rails and other adaptations
 - Technology Enabled Care (TEC)- allowing people to use technology to enable people to live independently at home, potentially preventing the need for adaptation to properties.
 - Housing support for older people- Handy Person to assist with minor adaptations and household DIY tasks.
 - Incentivisation 'Moving Assistance'- help move tenants into a more suitable property or moving tenant out of an adapted property who no longer needs it to alternative home.

- In close collaboration with the Business Growth and Infrastructure department and One Commissioning Organisation- remodel and refresh:
 - Bury Procurement Framework
 - Minor Aids and Adaptations model
 - Pathways and processes for people with additional needs to access adaptations to improve their quality of life.

3.0 Reasons for recommendation(s)

- 3.1 National guidance allows Local Authorities to consider more strategic and flexible use of DFG funding. The guidance goes further and encourages authorities to work with health and social care partners and align objectives with existing local social care, health and older people related strategies.
- 3.2 Local need suggests clearly that provision of assistance may target additional help for particular groups, such as Older people and those with specific conditions.
- 3.3 Bury Councils Strategy- Housing for those with Additional Needs, defines what the approach needs to be for residents in Bury. Housing must focus on providing local homes for those with additional needs in Bury, both now and in the future. Increasing housing choices for our older generation and adults with specialist needs, enabling an increased number of people to live independently at home. A refreshed approach to DFG spends must align to this, promoting wider options for people with additional needs and improving quality of life of residents.
- 3.4 Refined and focused DFG investment will provide long term savings to the public purse. Stronger control and utilization of the DFG will mean more people receive what they need to support their independence and defer further institutional or home-based care provision.
- 3.5 Ensure that recommendations are reflected in the wider Housing Assistance Policy documentation, which will be drafted by Business Growth and Investment Directorate.

Alternative options considered and rejected

- a) The alternative is to continue with the traditional delivery of the DFG and disregard the freedoms for the Local Authority to fund wider projects, so more people can receive the adaptations that they need. To keep with the same model for DFGs, it would not take advantage of the flexibilities afforded to councils to support more residents in the borough.

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4.0 Background

- 4.1 Home adaptations are changes made to the fabric and fixtures of a home to make it safer and easier to move around and do everyday tasks like cooking and bathing. Adapting a home environment can help restore or enable independent living, privacy, confidence and dignity for individuals and their families.
- 4.2 Disabled Facilities Grant (DFG) is a capital grant made available to people of all ages to contribute to the cost of adaptations. This is irrespective of housing tenure, which enables eligible disabled people to continue living safely and independently at home for as long as possible.
- 4.3 Recently updated guidance for the use of DFG ([Disabled Facilities Grant \(DFG\) delivery: Guidance for local authorities in England - GOV.UK \(www.gov.uk\)](#)) sets out key considerations, including the statutory duty under the 1996 Act to provide adaptations for those who qualify for a DFG. The primary role of the grant is for the provision of home adaptations to help eligible people safely access their home and key facilities within it. Eligible council tenants can apply for a DFG in the same way as any other applicant, however, Bury has a Housing Revenue Account (HRA) where the Local Authority should fund home adaptations for council tenants through this means. There is also an expectation the Local Authority will provide regular reports on spend and usage.
- 4.3 The updated guidance emphasises the importance of a collaborative approach to DFG, with health and social care along with housing providers expected to come together. The guidance also recognises Technology Enabled Care (TEC) as a viable use for DFG.
- 4.4 In section 2.24 of the guidance, it highlights the role of social care, its powers and duties under the Care Act relating to provision of TEC in the home, aids, equipment, and adaptations. These include a duty to provide minor adaptations up to the value of £1,000 as well as other equipment to any value.
- 4.5 The guidance describes how to improve delivery through a local Housing Assistance Policy (HAP) by streamlining processes for home adaptations, particularly for the most common types of work, such as bathroom modification, ramp access or installing a lift. Also known as a Regulatory Reform Order (RRO), the HAP describes how Local Authorities can assist people directly, or through a third party such as a Home Improvement Agency, to help in improving living conditions.

5.0 Introduction and progress to date

- 5.1 Bury currently uses the DFG in a traditional way and local related guidance, policies and processes require updating. Revised national guidance, changes to resource in Community Commissioning, corporate housing services, along with the development of the Housing for Adults with Additional Needs Vision, Strategy and Market Position Statement [Adult Social Care Housing - Bury Council](#), and Bury 'Let's Do it' Strategy [Let's Do It! strategy - Bury Council](#) provide opportunities for an integrated approach to shape DFG usage in the best manner for residents.
- 5.2 As a system, these opportunities include:
- Technology Enabled Care (TEC).
 - Expanding handy person scheme.
 - Wider range of aids and adaptation solutions.
 - Utilise floating support to enable people to live independently at home for as long as possible.
 - Working with providers in a different way, with a revised framework and considering how DFG can help people home from hospital in a timely manner.
- 5.3 A cross system Adaptations Steering Group has been established, terms of reference and action plan developed with all stakeholders are committed to collaboratively drive this agenda.
- 5.4 A Housing Growth Board and Subgroup has also been established, which is a cross system body with the mandate to deliver the housing agenda across the Council. Also Bury Council Registered Provider Partnership Framework has been formed creating a strategic partnership between the Council and Registered Providers (RPs) selected by the Council to deliver affordable housing including specialist and supported accommodation for Council owned land. It will help increase the supply of affordable housing including specialist and supported accommodation by ensuring the delivery of sufficient high-quality affordable housing to meet current and future needs of residents.

6.0 Review and remodel the Housing Assistance Policy

- 6.1 The primary legislation for the DFG is set out in the Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act). It provides for how a local authority makes decisions on DFG applications, including determining: the disabled occupant; the applicant; the eligible works; amount of grant and grant conditions. Grant is funded by the Better Care Fund which is managed by the Council's Private Sector Housing (PSH) team and within the HR. Once a formal application has been properly submitted, the housing authority is under a duty to consider it. An authority would be open to legal challenge if they refuse to accept a valid application or do not provide the necessary application forms. Local authorities cannot make charges for processing grant applications or for responding to enquiries

- 6.2 Following the introduction of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) and subsequently amended in 2006 and 2009, it enabled Local Authorities to develop a policy which is specific to local needs and issues. Bury Council following this legislation alongside local strategic commitments published a Financial Assistance Policy in 2014, which included various forms of assistance beyond the mandatory statutory grant. Unfortunately, it does not reference new strategic commitments made by the Council in the 'Lets Do It' Strategy, corporate Housing Strategy or recent housing for those with additional needs work.
- 6.3 Demand for major adaptations is expected to remain high. Challenges of an aging population, presentation of complex cases, particularly children cases needing extensive and expensive adaptations is likely to remain. In Bury there were 172 referrals for adaptations in 2020/21 and 225 in 2021/22. As of September 2022, there are 241 clients in the Private Sector Housing system waiting for adaptations (at various stages of completion). Whilst the full annual budget allocation for DFGs is allocated to cases, the current waiting times are unacceptable, and the Local Authority must find flexible solutions to ensure swift progression of applications leading to faster installation times, with the additional benefit ensuring that more of the budget allocation is spent 'in year'.
- 6.4 It is important to ensure adaptations are provided in a timely manner to help reduce households risks and prevent the need for formal care. It is also important that best use is made to limited funds available for this activity.
- 6.5 A Housing Assistance Policy will complement the Local Authorities statutory duty to provide mandatory DFGs and support the continuous improvement approach to the adaptations service by providing new and flexible forms of assistance within existing resources
- 6.6 The aims of a refreshed Housing Assistance Policy include:
- **Better management of expenditure.**
 - There is a significant 'in year' capital programme budget underspend
 - Last financial year (21/22) excluding RSL contributions, the service spent a total of £843,300, the budget allocation was £2,076,611.
 - Slippage from the previous year was £1,452,400. The total potentially available to the service last financial year was £3,529,011 consequently the underspend was £2,685,711.
 - **Increase the number of applicants assisted**
 - 69 grants were completed last financial year (21/22), with a further 15 grants part paid yet to be completed.
 - There are 241 cases in the system at various stages yet to be completed in 2022/23 this doesn't include the anticipated 170 referrals the service is likely to receive in 2023/24.
 - **Reduce the number of days a client waits for an adaption**
 - There are significant waiting times for people waiting for adaptations.

- Referral to completion average timescales for 2021/22 was 304 days for mandatory DFGs and 180 days for discretionary adaptation grants.
- The current KPI target is 212 days.
- **Ensure a tenure neutral policy** - which includes information on how Council house adaptations are to take place, how standard DFGs and minor adaptations are undertaken.

7.0 Review and refresh Procurement Framework

- 7.1 Bury's provider list/framework for works is outdated and has not been reviewed for over 10 years. The current process includes a requirement to obtain 3 quotations for every job, where delays in returning quotations are preventing progression of cases, further exacerbating the backlog of cases. There is potential to utilise the Manchester Framework that splits various adaptations/extensions into a list of specified lots with preferred suppliers. However not all providers on the framework are local to Bury, which excludes providers who may wish to work locally.
- 7.2 Bury should have its own Provider Framework with several lots based on the local demand. This would require testing the market to tender for providers to join a Bury framework. The benefits to this approach would be a Bury centric model, where scoring is weighted on local priorities, local providers and social value. There is confidence a revised framework would bring efficiencies and better value for money for work required.

8.0 DFG usage

- 8.1 DFG use in Bury is outdated, mainly funding adaptations and extensions. From local research and reviewing guidance on DFG; the funding could be used creatively to help tenants continue living safely and independently at home. There are several points which should be noted:
- Last financial year, the DFG allocation was £2,280,000. Of that fund £924,263 was spent in year with £1.28m remaining. Although there were £509,352 worth of approved grants that were not completed in year due to works or timescales. Also, an additional £1.7m approved grants in the system from previous years approvals. This could mean there are people with an approved grant whose needs have changed, and may no longer need adaptations, may be deceased or options such as TEC could provide a solution to their needs.
 - There is no way of prioritising the DFG application, although Occupational Therapists (OTs) score an application in priority order. The electronic system only progresses applications based on the time they entered the system or queue. This also means there is no current process of reviewing and checking those on the list or changing the priority order based on need.

- 8.2 GM ARC4 have been commissioned to conduct a GM wide review of adaptations services and policies with a view to ensuring parity across Local Authorities. They have produced a draft finding report which may influence forms of assistance offered via a DFG across GM.
- 8.3 Parity of means testing is one of the earlier recommendations highlighted from the ARC4 findings recommending a removal of means testing below £5,000. This will be well received given current socio-economic factors facing residents. Local consideration was given to means test on £10,000 upwards, this would likely help speed up processing of grants however reduce the opportunity of income of adaptations less than £9,999. It would also likely generate a pressure on budgets, as based on current work demands this could generate an additional cost of £800,000 per year which is not affordable. A means tests over £7,000 which would include stairlifts and level access showers may be more suitable. Therefore, the means testing options should be carefully considered and modelled.
- 8.4 The recent DFG guidance suggests that the DFG funding could be utilised in different ways. The proposals of how to utilise the £2,076,611 are highlighted in the below table.

	Allocation of Disabled Facilities Grant	Narrative/ Descriptor	Amount Allocated Per Annum	System benefit/ saving
1	Main DFG Programme	Aids, adaptations, extensions etc	£1,300,611	Income generated from means testing
2	DFG Top up Grants	Discretionary top up grant of up to £20,000 where costs of work exceed £30,000 max upper grant limit.	£80,000	Help provide parity across clients, helps supports those less well off financially.
3	Innovation Grants/ Excess Cold Grants	Fund range of innovation grants, to prevent accidents and hospital admissions and to support people to live independently in their own home.	£15,000	Innovation grants enable flexibility to meet needs without adaptation or capital costs.
4	Repairs to adaptations	Capital related expenditure for repairs to existing adaptations in	£20,000	Enables people to remain in the same property for longer – potential system

		cases, where tenant remains in the property with the same needs		savings as prevent or delay the need for more costly formal care or residential placement.
5	Minor Adaptations	Fund equipment store to provide larger minor adaptations costing less than £1,000.	£225,000	Currently Equipment store budget funded via community care budget £40,000 adaptations stores budget & £185,000 personal Aids budget (NCA) (Total £225,000)
6	Technology Enabled Care (TEC)	Fund the cost of TEC. Use monies to replace analogue units to digital. Help remove disparity/ inequitable process for funding/ charging for Carelink and other TEC. Enable people to live independently at home, potentially preventing the need for adaptation to property.	£130,000	System saving for the Community Care Budget, but also for the wider system in preventing, reducing, or delaying the need for more formal care, or admission to hospital.
7	Housing support for older people	A Handy Person post linked to Home from Hospital service. The role would assist with minor adaptations and household DIY tasks. This role could prevent/ reduce people falls or injury to tenants.	£38,000	System savings as preventative and may be cheaper than going through procurement process for minor aids such as handrail fittings. The post could also help generate income if advertised and offered to support people who were willing and able to pay.

8	Incentivisation 'Moving Assistance'	Provide funding in cases where it is not possible/not appropriate course to adapt existing property. Monies would be utilised to help move tenants into more suitable home or move someone out of an adapted property that no longer need it.	£100,000	Enables more speedily and efficient moves to achieve better outcomes for people. Would also be used when people are occupying an adapted property but no longer needing it.
9	Surveyor and technical support workforce	Providing resources to undertake surveying, technical and other workforce requirements for the adaptations to take place.	£168,000	The workforce cost has always been met by the DFG fund.
Total			£2,076,611	

8.5 The above will help utilise the DFG to prevent, reduce or delay the need for more formal or intrusive care and enable people to live safely and independently at home. It also generates potential system benefits and efficiencies, enabling a more person centred and flexible approach to supporting individual needs and circumstances.

9.0 Minor Aids and Adaptations Review

9.1 The Care Act 2014 specifies that the Local Authority should provide small aids and adaptations up to the value of £1,000 free of charge. Following the dissolution of the Home Improvement Agency, Six Town Housing have had a Service Level Agreement (SLA) in place since 2008 to deliver a minor aids and adaptations service in Bury. The budget for minor adaptations is currently under the Operations for Support at Home team budget (£116,000). The remainder of services returned to the Local Authority to deliver and manage.

9.2 Six Town Housing are currently unable to provide timescales for standard referrals due to an extensive backlog in cases. The budget remains unchanged in 10 years and Six Town Housing report they do not have the capacity or funds to deal with the increased number of referrals it currently receives. The likely increased number of referrals over the years are due to

an increase in demand and the significant increase in trusted assessor referrals.

- 9.3 There is now an opportunity to collectively review the current minor aids and adaptations process, analysing Six Town Housing data and understanding what activity or funding would be required to clear backlogs. Consideration should also be given to the current market shortage of supply and materials that may have an impact. This work should link into the equipment store processes and pathways, the development of TEC and Bury's digital first approach along with considering if minor aids and adaptations should form one of the lots in the revised procurement framework.

10.0 Improving data and performance intelligence

- 10.1 There is a statutory duty as part of the Better Care Fund to provide detailed reports, data and performance monitoring of DFG related spend and activity. This is not always possible, and those reports submitted are manually generated and take significant efforts and time to create.
- 10.2 The PSH team are unable to effectively manage their casework, as they currently use data software (Civica APP) which is no longer supported. The system is unable to meet the requirements to support the correct delivery of services to residents with additional needs.
- 10.3 It is not easy to establish the real time progress of individual cases on request. Currently the system is server with an accompanying paper-based system approach. This greatly slows down processing of grant applications and increases risk of errors clearly affecting clients detrimentally. Civica APP is used by other services in the Local Authority and is being reviewed at a corporate level. Plan drawing software the team use is also outdated, with no user guides available making it difficult to train new employees. Clearly new software would improve client outcomes, officer productivity and potentially assist with staff retention.

11.0 Review and refresh pathways and processes

- 11.1 Historically in Bury, there has been a high demand to extend or undertake major adaptations to properties. This may be partly due to lack of adapted properties in the general council housing stock and lack of investment to build additional properties to meet demand. However, this demand for major adaptations is not shared with similar neighbouring boroughs.
- 11.2 Stockport reported they undertake work of this nature in approximately one home per year. Given Stockport has a similar demographic and housing

stock, it cannot be due to demand differences. However, research shows Stockport has a strong TEC approach, VCSE sector support, tenant incentivisation process and clear pathways to consider several options. Major adaptations or an extension is the final preference considered if other options are not viable.

- 11.3 Bury has an established Living Options Group (LOG) where partners collaborate to consider housing options and property allocation to individuals with care needs. There is now a Registered Provider Framework and strong relations with Housing Associations and developers in Bury to develop creative solutions to complex challenges. Along with the revised digital approach, with TEC at the forefront, all should be part of a revised pathway to support those with housing challenges in a different and innovative way. Therefore, end to end process mapping to understand the current process and design revised process is required.
- 11.4 Following the implementation of any new process/pathway, ongoing monitoring, and review of that process its impacts, opportunities and barriers, should be undertaken regularly and at least on an annual basis to ensure best outcomes and ways of working.

12 Next Steps

- 12.1 This report outlines several key areas for consideration and the below table sets out high level actions.

Theme/ key area
1. Review and remodel the Housing Assistance Policy
2. Review and remodel Procurement Framework
3. Review and remodel DFG usage
4. Minor Aids and Adaptations Review
5. Improve data and performance intelligence
6. Review and remodel pathways and processes

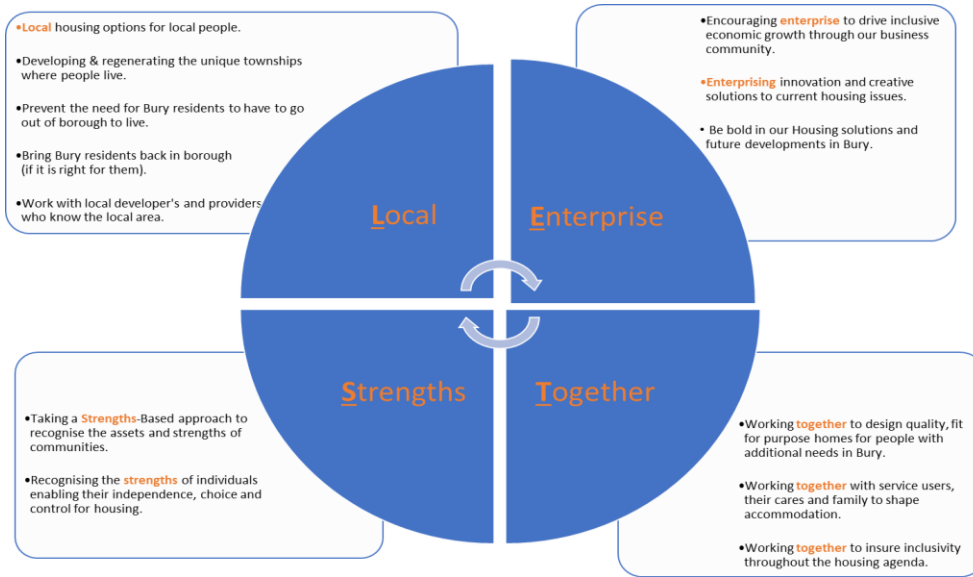
13.0 Contributing to wider Bury strategies

- 13.1 The revised national guidance, changes to council resource along with the development of the Housing for Adults with Additional Needs Vision, Strategy, Market Position Statement and Bury 'Let's Do it' provide the foundations to work collaboratively across health and social care.

Links with the Corporate Priorities:

Please summarise how this links to the Let's Do It Strategy.

The following diagram describes how the ASC housing programme for those with additional needs links with the corporate priorities:



Equality Impact and Considerations:

The outcomes of the initial equality impact analysis are positive. The realignment of the DFG and providing more services for people in the community will promote independent living for all people wanting to stay in their homes and improve their quality of life.

Environmental Impact and Considerations:

An environmental impact assessment has not been undertaken for the scheme, as there are no implications or carbon impact of this decision.

Assessment and Mitigation of Risk:

Risk / opportunity	Mitigation
To keep with the same model for DFGs, would not take advantage of the flexibilities afforded to councils to support more residents in the borough.	Adopt the recommendation of the paper to ensure more people are supported- in line with the Councils aspirations to support independence and improving the quality of life of all residents in Bury.

Legal Implications:

The provision of DFG is regulated by the Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) and has been correctly summarised in paragraph 6.1 of this report.

In addition to its duties to receive, determine and make payments of DFG to eligible applicants, the Council also has wide powers to provide discretionary financial assistance. These powers are provided for under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) provides general powers for local housing authorities to provide assistance for housing renewal, including home adaptations. The powers, detailed in Article 3, can only be used in accordance with a published Housing Assistance Policy.

The proposals and recommendations set out in this report are things the Council must provide in relation to DFG and may provide as additional Housing Assistance under the RRO. The consideration of the compliance and lawfulness of a Housing Assistance Policy (which could include policy as to DFG) should be considered at the point the Policy is submitted to the Cabinet for approval.

Financial Implications:

The 2023/24 OCO Directorate saving programme includes a £0.250m saving scheme relating to a review of the Utilisation of the Disabled Facilities Grant. The savings will be delivered from a combination of the initiatives set out in this report (paragraph 8.4) and the savings delivery will be monitored as part of the weekly OCO directorate savings review meeting.

The Capital expenditure set out in paragraph 8.4 relating to the proposed deployment of the Disabled Facilities Grant will be monitored within the Business Growth and Investment Directorate 2023/24 capital programme budget.

Background papers:

N/A

Please include a glossary of terms, abbreviations and acronyms used in this report.

Term	Meaning
DFG	Disabled Facilities Grant
TEC	Technology Enabled Care