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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation Document

## Housing Adaptations Service Standards

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Action required: Responses by 19 December 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

<b>Overview</b>	<p>The Welsh Government is consulting on Service Standards for Housing Adaptations that support disabled and older people to live more independently in their own home.</p> <p>The aim of the Standards is to ensure greater consistency on the way adaptations are provided regardless of a persons tenure or geographic location.</p>
<b>How to respond</b>	<p>This is a written, electronic consultation. Questions are summarised in a questionnaire at the end of this document. Please use this questionnaire to provide your feedback. Responses can be e-mailed/posted to the contact details below.</p>
<b>Further information and related documents</b>	<p><b>Large print, Braille and alternative language versions of this document are available on request.</b></p> <p>The consultation documents can be accessed from the Welsh Government's website at: <a href="http://www.gov.wales/consultations">www.gov.wales/consultations</a></p>
<b>Contact details</b>	<p>For further information:</p> <p>Independent Living Team Housing Policy Welsh Government Merthyr Tydfil Office Rhydycar Merthyr Tydfil CF48 1UZ</p> <p>email: <a href="mailto:IndependentLiving@gov.wales">IndependentLiving@gov.wales</a></p>

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## General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data. In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation. If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

### Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data holds about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:  
Data Protection Officer:  
Welsh Government  
Cathays Park  
CARDIFF  
CF10 3NQ

e-mail:  
Data.ProtectionOfficer@gov.wales

The contact details for the Information Commissioner's Office are:  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 01625 545 745 or  
0303 123 1113  
Website: <https://ico.org.uk/>

## 1. Aim

The Welsh Government recognises the essential role housing adaptations play in supporting disabled and older people to live safely and independently, improving the health and wellbeing of the individual supported including their families and reducing pressures on frontline services such as health and social care. The preventative work which housing adaptations offer is very much in line with the principles of the Wellbeing of Future Generations Act, and the approach set out in Prosperity for All and Healthier Wales.

The provision of support for housing adaptations in Wales is complex and is a reflection of the multiple partners involved in the care and support arrangements of disabled and older people.

To provide greater consistency of delivery across Wales the Welsh Government plan to publish National Service Standards for the delivery of housing adaptations to support disabled and older people to live independently in their own home. The aim of the standards is to set out the level of service expected for the delivery and installation of a housing adaptation that service users, regardless of their geographic location and tenure, can expect. The Service Standards should ensure service providers deliver housing adaptations in a more consistent manner and inform service users on the level of service to expect when they seek support for a housing adaptation.

## 2. Key Issues

Recent independent reviews have highlighted the complexity of the different ways in which housing adaptations are provided. Examples of reports include:

- A review of Independent Living Adaptations: Welsh Government (2015) <sup>1</sup>
- Housing Adaptations: Wales Audit Office (2018) <sup>2</sup>
- Housing and Disabled People: Equalities and Human Rights Commission (2018) <sup>3</sup>
- Housing Adaptations: Report of the Public Accounts Committee (2018)<sup>4</sup>

Each report has identified issues of funding complexity and the challenging arrangements for accessing services across Wales. The multiple funding programmes in place for providing adaptations in Wales has resulted in service users receiving different levels of service as a result of their tenure and where they live.

## 3. Scope

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<sup>1</sup> <https://gov.wales/statistics-and-research/review-independent-living-adaptations/?lang=en>

<sup>2</sup> <https://www.audit.wales/system/files/publications/housing-adaptations-2018-english.pdf>

<sup>3</sup> <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-wales-hidden-crisis.pdf>

<sup>4</sup> <http://www.assembly.wales/laid%20documents/cr-ld11703/cr-ld11703-e.pdf>

These standards will be applied to all housing adaptations, and will be relevant to:

- Local Authorities
- Care and Repair Agencies
- Registered Social Landlords
- Large Scale Voluntary Transfer (LSVT) organisations
- Occupational Therapists

In addition to the above, the Service Standards will be relevant for Healthcare and Social Service Professionals.

The Welsh Government will keep the standards under review, and may publish amended standards as appropriate.

Legislation requirements for the delivery of specific types of adaptation overrides any services standards outlined in this document, and service provider should seek their own legal advice where needed.

#### **4. Service Standards for the delivery of Housing Adaptations**

The Service Standards set the expected levels of service for the installation of a Housing Adaptation and can be seen at **Figure 1**.

Setting service levels will help to ensure housing adaptations are delivered in a consistent manner, regardless of a service users location and tenure, whilst giving flexibility to service providers to determine the best way to utilise their own resources to meet the standards.

Due to the complexity of delivering some housing adaptations, especially larger sized adaptations, the process can result in a number of steps that may involve input from wider stakeholders such as the planning department, building control teams and utility companies. These steps have to be taken to ensure that the adaptation will provide the help and assistance needed for the service user and meets broader legislative requirements. As a result, the timeframes for delivering a housing adaptation can vary due to this. The 'Expected Timeframes' service standard in **Figure 1** has been split to reflect the following key phases that can be involved in deciding if a Housing Adaptation should be provided:

- The time it takes from a service user making first contact with a relevant Service Provider (this could be a Local Authority, Care and Repair Agency, Housing Association or from their health or social services contacts) to being assessed by a competent person (such as Occupational Therapist or Trusted Assessor) and;
- The timescale for an Occupational Therapist (or another suitably competent person) report/referral/recommendation being provided to the service provider outlining the adaptation works required.

- The date of referral (or decision, recommendation, report) made by the competent person when the adaptation is confirmed as needed to installation. This is to ensure that alternative forms of assistance (e.g. re-ablement) are considered before deciding a housing adaptation is needed.

The Welsh Government expect the service provider to work in collaboration with Occupational Therapists (or other competent persons who can advise and identify the required adaptation) as well as the service users to determine the best possible outcome is achieved, while still reflecting the principles of all work being necessary and appropriate, reasonable and practicable.

Definitions of the different types of housing adaptations (Small, Medium or Large) are listed in **Figure 2**. These are included to provide a guide for service providers to determine how to record the most appropriate type of adaptation (Small, Medium or Large). The Welsh Government recognises there may be situations or individual cases which do not fit within the categories of Figure 2. In these cases, service providers should use their professional judgement to decide the most appropriate category to use, based on sound judgement and evidence.

The definitions in **Figure 2** also aims to help service users understand the different types of adaptations and what they can expect in how they are delivered by the service provider.

## **5. Monitoring of Service Standards**

Performance monitoring data will be submitted to the Welsh Government using existing data collection methodology for the ENABLE data; national performance data for each organisation will be published on an annual basis.

## **6. Complaints and concerns**

If a service user is not satisfied with the level of service received, they have the right to make a complaint. Any complaints should be directed to the Service Provider and handled in accordance with their organisational complaints procedure.

**Figure 1 Housing Adaptations Service Standards**

Service Standard	Level of Service Expected
<b>Standard 1: Purpose</b>	The purpose of a housing adaptation is to help disabled and/or older people to remain or become more independent within their own home. The adaptation provided should be necessary and appropriate, as well as reasonable and practicable.
<b>Standard 2: Equality and Diversity</b>	Disabled and/or older people can expect that they will be treated fairly and respectfully. Service providers will ensure they have equality and diversity policies in place to ensure this.
<b>Standard 3: Communication</b>	Information and communication will be in a format which most effectively meets a service users needs, such as Welsh and English, and accessible formats including braille, large fonts, audio versions and other languages. At the start of the process the service user (or their representative) will be informed of the key steps to install an adaption, be included in the decision making process, informed of the expected timeframes, be regularly updated on progress and invited to provide feedback at the end of installation.
<b>Standard 4: Quality of Service</b>	The work will be completed by a suitably competent person, either an employee of the Service Provider or someone from their approved contractors list which is regularly monitored by the Service Provider. If a service user decides to use their own contractor to carry out the work it will be the service users responsibility to deal with and resolve any issues.
<b>Standard 5: Quality of Equipment</b>	Any equipment installed will be compliant with relevant health and safety requirements, technical specifications and be appropriate for the purpose which they were intended. service user should also be informed of any warranty information, service charges and maintenance requirements where it is appropriate to do so.



<b>Standard 6: Expected Timeframes</b>	<b>For Small Adaptations:</b> The solution will usually be installed within 2 weeks from date of first contact with the Service Provider who have deemed it necessary for the adaptation to be installed.
	<b>For Medium Adaptations:</b> - From first point of contact with the Service Provider, the service user can expect to be assessed within 2 months by a competent person e.g. an Occupational Therapist, or Trusted Assessor. - Once the adaptation is confirmed as necessary the Occupational Therapist or Trusted Assessor will provide a report/referral/recommendation to the service provider within 2 weeks of the decision. - Solution usually installed within 4 months (or in line with legislative requirements) from date of referral/recommendation from a competent person.
	<b>For Large Adaptations:</b> -From first point of contact with the Service Provider, the service user can expect to be assessed within 2 months by a competent person e.g. an Occupational Therapist. - Once the adaptation is confirmed as necessary the Occupational Therapist will provide a report/referral/recommendation to the service provider within 2 weeks of the decision. - Solution usually installed within 15 months (or in line with legislative requirements) from date of referral from a competent person, to reflect steps taken in some cases, e.g. planning permission.
<b>Standard 7: Eligibility Checks</b>	<b>For Small Adaptations:</b> - Means Test is not required. - Occupational Therapist assessment not required. - Trusted Assessor assessment may be required.
	<b>For Medium Adaptations:</b> - Means Test may be required. - Occupational Therapist Assessment may be required. - Trusted Assessor assessment will be required.
	<b>For Large Adaptations:</b> - Means Test may be required. - Occupational Therapist Assessment will be required. - Trusted Assessor assessment would not be appropriate in these cases.

**Figure 2 – Definitions of different types of Housing Adaptations**

Category	Nature of Work Required	Example of Work	Funding Source
<p><b>Small Adaptions</b>                      adaptations are inexpensive items, which can be provided very quickly. It would generally fit into the description of 'immediate falls prevention' or 'urgent for hospital discharge' and can be assessed and installed within days or the same day if urgent. It can be identified by a number of health/ social services/ other appropriately trained staff e.g. RSL staff, Care and Repair Staff.</p>	<ul style="list-style-type: none"> <li>• Minor home modification required</li> <li>• Not a specialised solution</li> <li>• No building/planning approval required</li> <li>• Adjustable / Flexible</li> <li>• Simple &amp; Intuitive</li> <li>• Minimal maintenance and/or servicing</li> </ul>	<ul style="list-style-type: none"> <li>• Grab rails</li> <li>• Stair rails</li> <li>• Small ramps</li> <li>• Accessible taps</li> <li>• Key safes</li> <li>• Mop stick hand rails</li> <li>• Outdoor rails</li> <li>• External / staircase lights</li> <li>• Additional electrical sockets.</li> </ul>	<ul style="list-style-type: none"> <li>• ENABLE</li> <li>• RRAP</li> <li>• RSL Funds</li> <li>• LA own funds</li> <li>• Self funded</li> </ul>
<p><b>Medium Adaptations</b>                      anything which is not classed as small or large.</p>	<ul style="list-style-type: none"> <li>• Major home modification may be required, but building/planning approval not required.</li> </ul>	<ul style="list-style-type: none"> <li>• Walk in shower</li> <li>• Stair lifts</li> <li>• Large ramps</li> <li>• A combination of adaptations installed as one job</li> </ul>	<ul style="list-style-type: none"> <li>• ENABLE</li> <li>• RSL Funds</li> <li>• LA own funds</li> <li>• Physical Adaptation Grants (PAG)</li> <li>• Disabled Facility Grant (DFG)s</li> <li>• Self funded</li> </ul>
<p><b>Large Adaptations</b>                      these are works which will require specialist assessments and major adaptations to a property such as extensions and through floor lifts. An Occupational Therapists assessment will be required and planning permission may be needed.</p>	<ul style="list-style-type: none"> <li>• Major home modification / structural change required</li> <li>• Specialised / Innovative solutions required</li> <li>• Building / planning approval required</li> <li>• Fixed / permanent / long term</li> <li>• Complex / unfamiliar / requires training &amp; supervision</li> <li>• Solution requires expertise for installation and maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Building an extension to provide a downstairs bedroom and/or bathroom</li> <li>• Through floor lift</li> <li>• Significant internal structural modifications e.g. relocate bathroom or kitchen</li> </ul>	<ul style="list-style-type: none"> <li>• Disabled Facilities Grant</li> <li>• Physical Adaptations Grants</li> <li>• RSL Funds</li> <li>• LA own funds</li> <li>• Self funded</li> </ul>

**Consultation  
Response Form**

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

**Housing Adaptation Service Standards**

**Question 1:** Will the proposed service standards improve the way housing adaptations are delivered in Wales? If not, are there further service standards which should be included?

**Question 2:** Are the proposed service standards on the 'Expected Timeframes' (Service Standard 6) challenging enough?

**Question 3:** Are the definitions for a small, medium and/or large adaptation sufficiently clear? If not, how could they be clarified?

**Question 4:** Are there any issues relating to impact on the Welsh language, equalities or children's rights in relation to this draft guidance that you wish to highlight?

**Question 5:** Do you have any further comments to add?

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: