

JULY 2024 DFG BRIEFING

HEALTH AND WELLBEING SCRUTINY



1. INTRODUCTION

The purpose of this briefing is to provide detail regarding Disabled Facilities Grants, how they are delivered in Plymouth, waiting times, budgets and demand.

2. OVERVIEW

A Disabled Facilities Grant (DFG) is a means tested grant designed to help meet the costs of adaptations to a property for a disabled occupant. In summary, in order to qualify for a DFG:

- The required adaptations need to be necessary and appropriate (as determined by Livewell Southwest or Children's Services) to meet the needs of the disabled person; and
- It must be reasonable and practicable (determined by the housing department – Community Connections, Major Adaptations Team) for the relevant works to be carried out.

Reasonable and Practicable

As mentioned above, in order to get a DFG for alterations in the home, those alterations must be reasonable and practicable. When deciding whether proposed alterations are reasonable and practicable, a Local Housing Authority has to have specific regard to the age and condition of the building. The Local Authority will also consider things such as the effect on other residents, the practicalities of carrying out work on properties with limited access, conservation considerations, and the structural characteristics of the property.

A Local Authority may consider it more reasonable to move a person to another property rather than fund the alterations which have been requested. Whether this is lawfully allowed will depend on the facts of the individual case. The guidance available states that, if the alterations needed are not cost-effective, the option of moving to alternative accommodation should be considered.

Necessary and Appropriate

In addition to the requirement that any alterations be reasonable and practicable, a Housing Authority should also consult the relevant Social Services department (Livewell Southwest or Children's Services) to ensure that any alterations are necessary and appropriate. This means that it would be necessary to get a Occupational Therapist assessment from your Social Services department before any application for a DFG would be granted.

The maximum mandatory award for a DFG is £30,000. As this grant is means tested, some people may have to pay a contribution towards the required work themselves.

Disabled Facilities Grants were introduced by the Housing Grants, Construction and Regeneration Act (HGCRA) 1996. There are also annual regulations called the Housing Renewal Grants Regulations which govern how Local Authorities administer Disabled Facilities Grants.

There is also good practice guidance which Local Authorities are encouraged to follow when administering DFG's, called Delivering Housing Adaptations for Disabled People: A Good Practice Guide.

Eligibility

A DFG is only available to people who are disabled within the meaning of the National Assistance Act 1948. This means that a DFG will not be granted to a person who is merely elderly or retired.

In addition, a DFG is only available to pay for alterations to a disabled person's main residence. It is possible for a disabled person to apply for a DFG if they are a tenant. The disabled person must have lived, or be intending to live, in the property in question for at least five years, or for such a shorter period as their health and other relevant circumstances permit.

Eligible Works

Mandatory grants can be awarded for the following works:

1. Facilitating a disabled person's access to:
 - a. The dwelling.
 - b. A room usable as the principal family room, or for sleeping in.
 - c. A toilet, bath, shower, etc (or the provision of a room for these facilities).
2. Facilitating the preparation of food by the disabled person.
3. Improving/providing a heating system to meet the disabled person's needs.
4. Facilitating the disabled person's use of a source of power.
5. Facilitating access and movement around the home to enable the disabled person to care for someone dependent upon him or her.
6. Making the dwelling safe for the disabled person and others residing with him or her.
7. Facilitating access to and from a garden, or making a garden safe.

Adaptations to facilitate access around the home can include adaptations allowing a disabled person to do things such as prepare and cook food, although full adaptations to a kitchen are unlikely to be funded if the majority of cooking is done by another family member.

Adaptations for access will also include work for access to the principal family room, a room used for sleeping and rooms containing a toilet and/or washing facilities. In particular, the importance of being able to wash and bathe has been emphasised by the Local Government Ombudsman.

Discretionary Grants – 'Top Up' Grant

The Local Housing Authority (responsible for the administration of the DFG) also has the discretion to give grants for a wide variety of other adaptations. These include works to make a home suitable for a disabled occupant's accommodation, welfare or employment.

In some circumstances the Housing Authority may also give a discretionary 'Top Up' grant for works which meet the purposes for a mandatory grant, but which cost more than the maximum mandatory amount of £30,000. If, for example, the agreed adaptations would cost £40,000, then the first £30,000 would be mandatory but the council could then give a discretionary 'Top Up' grant for the extra £10,000.

Applicants should be aware that it is often difficult to get a discretionary grant as the Local Authority does not have to award them and they usually have other competing demands on their budget. However, the Local Authority does have to consider the application.

Means Testing

The mandatory part of Disabled Facilities Grants are means tested, which means that some people may have to pay a contribution towards their grant. Only the financial circumstances of the disabled person, his or her spouse or civil partner or co-habiting partner are assessed and not other members of the household.

Applications on behalf of a disabled person under the age of 19 are not means tested.

Customers in receipt of certain benefits are also exempted, and considered 'passporting', details of which will be given upon application.

Following the means test, if the income is below a certain threshold the applicant will be entitled to the full mandatory maximum of £30,000. If income exceeds the threshold, the grant may be reduced by a certain amount depending on the clients income.

Timescales

The timescales will depend upon the urgency and complexity of the adaptations required. More urgent cases will be prioritised for action, but larger and more complex schemes will take longer to complete.

Upon an application becoming valid, works should be approved within 6 months of that date. Works are then required to be paid off within 12 months of this date.

The following highlights the 5 key stages of any application and a table showing best practice targets.

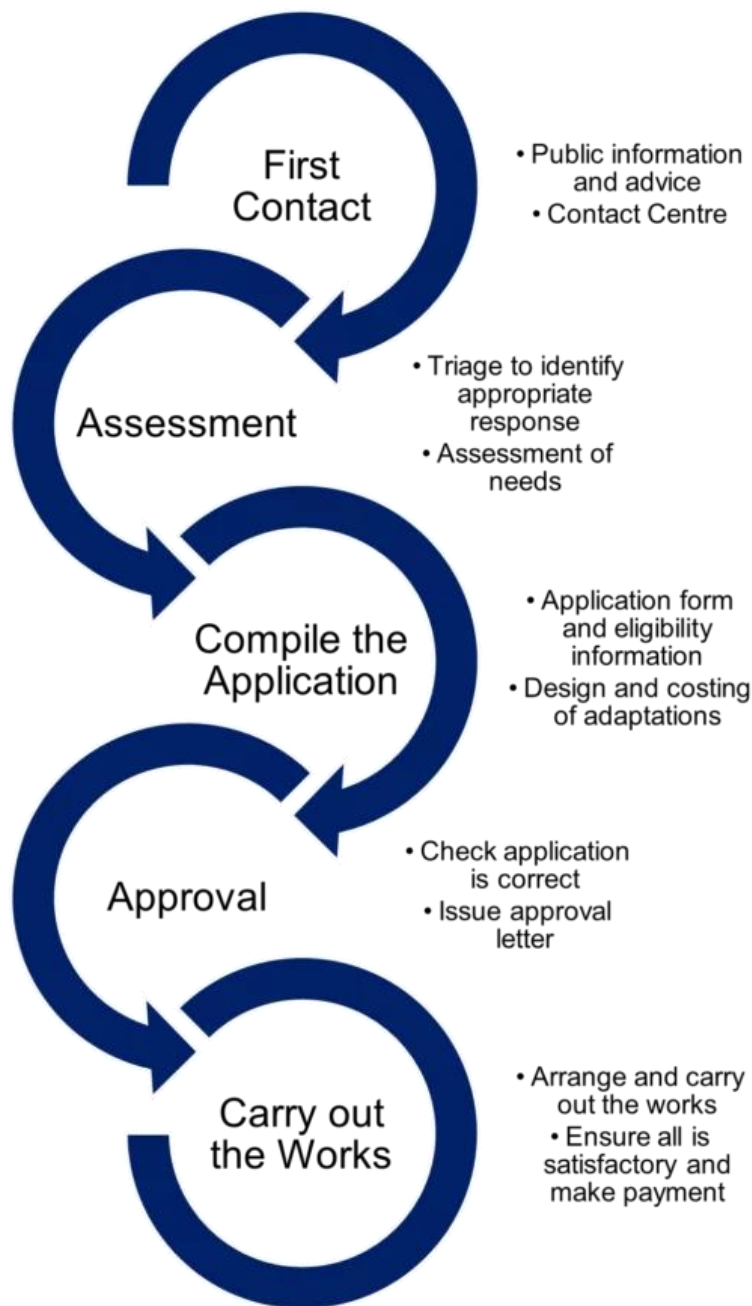
Stage 0: first contact with services

Stage 1: first contact to assessment and identification of the relevant works

Stage 2: identification of the relevant works to submission of the formal grant application

Stage 3: grant application to grant approval

Stage 4: approval of grant to completion of works.



Target timescales (working days)					
Type	Stage 1	Stage 2	Stage 3	Stage 4	Total
Urgent & Simple	5	25	5	20	55
Non-urgent & Simple	20	50	20	40	130
Urgent & Complex	20	45	5	60	130
Non-urgent & Complex	35	55	20	80	180

Prioritisation

It is recommended that authorities use a triage system to make an initial assessment of the complexity and urgency of a case. A good triage system will help everyone gain a shared understanding of the likely timescales for delivery. It will also enable the right team with the right skills to properly assess the case.

Authorities are recommended to treat cases as urgent in the following circumstances:

Coming out of hospital and at risk

- Living alone and at risk
- Severe cognitive dysfunction and at risk
- Living with a carer who is elderly or disabled
- Living without heating or hot water and at risk
- Limited life expectancy

Categorising complexity and urgency at this early stage will set the target timescales for the rest of the process. However, this should be kept under review as circumstances change or if further information is uncovered during the assessment.

3. PLYMOUTH DELIVERY MODEL

In Plymouth the Major Adaptations Team consists of:

1 x Major Adaptations Team Manager

1 x Technical Lead

2 x Senior Community Connections Officers

2 x Community Connections Officers

2 x Part time Occupational Therapists

In line with the above-mentioned timescale section the following displays the process of an application, who is responsible and what the actions are.

Stage 0 - first contact

In Plymouth the first contact will either be with Livewell Southwest or Children's Services.

Stage 1 - first contact to assessment and identification of the relevant works

As part of the clients holistic assessment there will be considerations regarding the home environment and what adaptations may be necessary and appropriate. In Plymouth this will be completed by Livewell Southwest or Children's Services Occupational Therapists.

Stage 2 - identification of the relevant works to submission of the formal grant application.

Where adaptations have been identified and classified as necessary and appropriate by Livewell Southwest or Children's Services Occupational Therapists, a referral will be completed and sent to Community Connections, Major Adaptations Team.

Stage 3 - grant application to grant approval – Pre Validated

Upon receipt of the application business support will input information onto systems used to manage major adaptations. Business support will consider property ownership, seeking landlord approval, requesting relevant supporting information from the clients and conducting means testing where required.

Stage 4 - approval of grant to completion of works. Valid Application

Upon an application becoming valid it's progression will be prioritised in line with other valid cases using the following rule:

Fast Track – 1 month

Red – 3 months

Amber – 5 months

Green – 6 months

Once the case is ready for progress in line with prioritisation it is uploaded onto the Dynamic Purchasing System (DPS). The DPS is a system which permits eligible contractors to tender for works, creating a competitive process which considers performance and costings. Upon a contractor being selected they will then attend the property, complete site surveys, discuss adaptations with the client, complete drawings and submit them to the Major Adaptations Team to review. Once satisfied with the drawings funding will be approved and the contractor will have a set period in which they are expected to complete works, this is usually 6 weeks however this will be reviewed depending on urgency.

** It should be noted that many DFG cases require multiple pieces of work to be undertaken in a home. Last year whilst 255 cases were completed, 374 pieces of work were delivered. Where multiple pieces of work are required, it is likely that both pieces will require tendering due to different contractors being required.*

4. PLYMOUTH DEMAND

The table below shows the number of clients referred into the Major Adaptations Team. Further the table provides detail in respect of the number of adaptations required to be delivered, the estimated costs determined by average costs of the adaptations requested (works in progress will be post site visit and as such will be the most accurate), and priority rating.

Stage	Number of Cases	Number of Adaptations	Cost	Priority			
				Fast Track	Red	Amber	Green
Pending Validation	313	422	£2,621,000	13	104	117	79
Valid	106	163	£1,089,000	6	31	46	23
Valid - Works in Progress	83	206	£840,165	16	49	46	23

Due to the nature of the client group having complex needs, there are occasions where cases are not able to be progressed in line with the desired timescales. Examples of where cases may get delayed; hospital admissions, condition deterioration, sickness, requirement of alternative housing to be provided during the period of works, supply chain shortages.

Further delays are caused by clients failing to provide additional information to permit the completion of means testing. Cases remain in pre validated stages until such time as information has been received and checks completed. Focused work is periodically conducted to follow up with clients in respect of this.

Beyond the current cases that the Major Adaptations Team are progressing, there are currently in the region of 240 cases with Livewell's Occupational Therapist Teams which are likely to result in an application for a DFG.

5. PLYMOUTH WAITING TIMES

Every year the Department for Levelling Up, Housing and Communities asks Housing Authorities to submit data on their DFG programme which is referred to as the DELTA return.

The following displays the waiting times in working days for Plymouth through financial years 21/22 and 22/23.

	22/23	21/22
Enquiry to Valid Application	55	105
Valid Application to Approval	112	77
Approval to completion	66	85

6. PLYMOUTH BUDGET

The £625 million allocated for DFG in 2024-25 represents a 184% increase in funding for home adaptations since 2015, and Government remains committed to helping older and disabled people to live as independently as possible in their own homes.

Of the central funding, Plymouth receives a percentage allocation displayed below. Further the table shows the number of cases completed in the period.

	Number of completed cases	Better Care Fund Allocation
24/25 To Date	63	£3,069,132
23/24	255	£3,059,312
22/23	316	£2,813,781
21/22	272	£2,813,781
20/21	160	£2,813,781
19/20	170	£2,479,859

Means Testing

In 2022/23 means testing of all clients over 19, who didn't have passporting benefits, brought in a total of £5,598.67. This figure is likely to be less than or equal to the costs of conducting the tests. Whilst other areas have removed means testing in order to speed up processes, they are now finding that they are seeing increased demand which is believed to be linked. In order to contain demand and ensure money is spent on those in greatest need, Plymouth will not be considering the removal of means testing currently.

Current Position

Of the year's £3,069,132 allocation, £482,759 has been spent on the delivery of works and £839,295 is committed with contractors for specified works. Following deductions for Minor Adaptations, maintenance programs and resourcing there is £1,335,440 left to spend. Works totaling £178,853 will be tendered every month for the rest of the financial year.

The available budget of £1,355,400 permits the major adaptations team to deliver all cases considered valid currently. However, the residual available budget of £246,440 will not cover all works currently listed as pending validation, and this does not consider clinical fast track cases, red cases or other cases which are currently unknown to service.

Risks and Mitigation

The Plymouth report displays that there will be a major shift in the population structure of Plymouth over the next 20 years as the proportion of the population aged 75 and over increases. The ONS projects a rise in the percentage of the Plymouth 75+ population of 60.3%, from 22,800 to 36,550 by 2043.

Building on this the report further highlights that more people are living with a disability now than in the past because the population, as a whole, is living longer and improved medical treatments are enabling more people to manage long-term health problems.

The delivery figures of 22/23 show there were 18 adaptations delivered for those aged 17 or under, 134 for those aged 18-65 and 134 delivered to those aged 66+.

Combining these factors together with a budget that, which whilst it has grown, is not sufficient, highlights that action is required to ensure that those in greatest need, have the adaptations they require.

The following actions are being undertaken mitigate risks posed by increasing demand, delivery costs and budget shortfalls.

1. Approach the Better Care Fund for additional funding.
2. Introduce a multi-disciplinary Discretionary Funding Panel – all cases now set to exceed the £30,000 grant maximum will be reviewed by Livewell, Children’s Social Care and Community Connections, to consider alternative options in order to drive down costs.
3. Contractor reviews – all works proposed are reviewed in order to ensure that additional costs are not incurred delivering works outside of what is necessary and appropriate and in line with grant rules.
4. Increase buying power – The below figures show the average cost increases over the past 5 years. With this only likely to grow, we are now working with the DPS provider and other authorities nationally to approach suppliers direct in order to reduce costs by combined buying power.

2019/20	£7,040
2020/21	£6,355
2021/22	£7,207
2022/23	£9,444
2023/24	£11,311.72
5. Work with Occupational Therapists to ensure that adaptation requests are to meet client need and not client want. Ensuring that we manage expectations at the front door and not over promising.
6. Independent Living Policy 2019 (ILP 2019) Review – the Adult Social Care White Paper had intended implementing change for DFG’s, and as such the ILP 2019 review was delayed. However, the ASC White Paper has now been shelved, as such later in 2024 the Policy will be reviewed to ensure that we are using money in the best way and in line with legislation.
7. Explore alternative funding opportunities on a case-by-case basis to seek relief on the DFG budget and share costs where appropriate. Whilst the number of children’s cases is considerably lower, due to the requirement to cater for changes in client need, cases are usually more expensive to deliver. Working with Children’s Social Care has opened additional funding opportunities on some cases and the Major Adaptations Team will continue to explore this moving forwards. Further examples of this may be Community Health Care funding, charity funding or employer funding.
8. Work with the Better Care Fund to ensure that topography is considered in grant calculations. Early reviews of areas which receive similar funding allocations are shown to have less gradient changes. Considerations should be given to the substantial costs associated with ramp and platform lift installations when determining the grant allocation.

9. Work across the private rented sector to increase awareness of adaptations – with 186 adaptations delivered to private rented properties in 22/23 it is key that landlords are aware of adaptations, understand their importance and how they can maintain installations to permit continual use post tenants moving on.

10. Consider schemes such as Lendology for all cases set to exceed the grant maximum. This will place the financial responsibility onto the client and away from the local authority.

11. Introduce new systems to manage adaptations – currently the Major Adaptations Team use multiple platforms to deliver their work. Bringing these into one system, with customer, contractor and partner facing platforms, this will increase resource efficiencies permitting better client journey, time saving, information sharing and permit a level of innovation.

12. Offers and Asks – DFG budgets need to increase inline with inflation and increasing demand. Nationally Local Authorities do not have available budgets to mitigate budget shortfalls and greater pools of funding are required in order to prevent, delay and reduce social care demand, enabling people to live in their homes for longer.