

Nick Garland
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Cabinet Office
Room 4.14 Admiralty Arch
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London SW1A 2WH

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Dear Nick

Introduction

Thank you for giving us the opportunity to respond to the *Improving the life chances of disabled people* report. As a coalition of 13 of the UK's leading housing, disability and children's charities we are pleased to be involved in the development of this exciting strategy.

We warmly welcome the *Life chances* report in its broadest sense and a number of us have been involved in the development of the strategy individually. The purpose of this paper is to comment specifically on the issue of the disabled facilities grant (DFG) which is mentioned a number of times in the report.

Our coalition has been created to campaign for reform to the disabled facilities grant (DFG) for families with disabled children. All the organisations which make up our coalition have had first-hand experience of how the current DFG process is failing families across the country and since the coalition was formed, many families, academics, support workers and occupational therapists amongst others have contacted us to share their experiences and to add their support to the campaign.

Analysis of poor housing outlined in *Life chances*

We welcome the thorough analysis of the problems faced by disabled children and their families who are living in inaccessible housing outlined in the *Life chances* report. These difficulties match our own findings and present a conclusive picture that inaccessible housing remains a key barrier for disabled children and that the current DFG process is failing families around the country. *Life chances* laid out a number of important reasons why inaccessible housing needs to be tackled – primarily through improving the DFG:

Impact on the family – as many as three out of four families with disabled children live in unsuitable housing, a much higher figure than for the population in general. The lifelong impact of this affects not only the disabled child, but also siblings, parents and everyone involved in family life. Families are put under considerable stress and may not be able to meet even the basic needs of their children, such as enabling them to play, join in with family life or move around the house.

Failure to implement invest to save approach – the report highlighted the importance of delivery on an ‘invest-to-save’ basis – so that spend in one area generates savings in another area and/or over the longer term. Failure to carry out necessary housing adaptations leads to far greater public expenditure in health, social care, education and benefits, than would otherwise be necessary. Budgets are often skewed towards later, more intensive and expensive interventions rather than adequate early preventative support which is unlikely to be cost effective. However, there is no effective process for considering the implications of failing to provide appropriate adaptations.

Improved health consequences of adaptations – providing appropriate equipment and adaptations has a positive impact on the life chances of a disabled child. For example, good adaptations increase a child’s independence, reduce the need for personal assistance and can prevent or reduce health problems. Research highlighted in the *Life chances* report shows that three out of four people said housing adaptations had helped their health – for families with disabled children these benefits are also seen by parents and siblings.

Problems with the DFG outlined in *Life chances*

The *Life chances* report also specifically highlights many of the problems faced by families who are applying or receiving a DFG. This analysis strongly supports our coalition’s research, especially relating to:

Problems with the means test – the DFG means test that does not take into account outgoings such as mortgage repayments or real expenditure on children. This creates particular difficulties for families with disabled children who often require the most expensive adaptations but who are assessed as being able to contribute tens of thousands of pounds more than they could possibly afford. Indeed, one third of families who have been assessed to make a contribution towards the cost of adaptations are unable to meet the cost and the vital work is not carried out. Furthermore, the Strategy Unit also highlight that the current system is acting as a disincentive to work. We have spoken to many families who are either trapped in an inaccessible home or facing unmanageable debt because of the unfair means test.

Delay – the *Life chances report* powerfully demonstrates that delays in processing applications for disabled facilities grants can have a considerable impact on a disabled child and their whole family, resulting in increased dependence on personal care, accidents, poor health, and even hospitalisation. As a child grows beyond the early years, housing adaptations become increasingly important as, for example, lifting becomes more difficult and yet the current DFG process does not provide adequate mechanisms to fast-track urgent cases. Some families who have contacted the coalition have been waiting for adaptations for over three years – a situation that is making their lives unbearable.

Lack of flexibility – the current DFG process does not encourage a creative or flexible approach to adaptations. The Strategy Unit points to evidence that work is sometimes carried out to a fixed cost or set of guidelines rather than to really address the needs of the disabled person. For disabled children, this can mean that adaptations require updating or changing far earlier than should be necessary which is another poor use of public resources.

What would the coalition like to see?

We are delighted that the *Life chances* report has demonstrated the Government's commitment to urgent reform of the DFG. This follows the creation of a cross-Government review group to consider changes to the DFG as well as increased investment in the DFG system. The review group are due to publish their findings after the election and we hope that their recommendations for reform of the DFG are considered a priority for the incoming Government.

***Life chances* recommendations – 4.9 and 5.7**

The *Life chances* report recommends that the Office of the Deputy Prime Minister should consider urgent reform of the DFG in both the Independent Living and Early Years sections of the report. In particular the report makes clear the need for:

- consideration of whether changes to existing eligibility criteria could mitigate disincentives to paid employment
- families with disabled children to also have their distinct housing needs met

Our coalition is calling for three main changes to be made to the current DFG process. We believe that the adoption of these recommendations would help to overcome a number of the problems faced by families with disabled children outlined in *Life chances*.

- 1. Abolish the means test** – the means test does not accurately assess a family's ability to pay and is preventing many families from carrying out the adaptations they need. Over 150 MPs of all parties support abolition as the best option for reform, as do many professionals, academics and families. The means test has already successfully been abolished in Northern Ireland and Wales.
- 2. Raise the mandatory cap above £25,000** – most DFGs are for small amounts of money. But a minority of families with disabled children need more substantial work, such as an accessible downstairs bathroom which costs considerably more. The existing cap should be significantly raised for the small number of families who need extra help.
- 3. Streamline the process** – we recognise the need for the DFG process to be rigorous. However, the current process is overwhelming for many families and is both time consuming and draining. We would like an effective, streamlined and transparent process introduced across the country to help families make adaptations.

In order for these measures to have the necessary impact, it will be important for the DFG to be properly funded. In addition to seeing housing adaptations as an invest-to-save policy we would also welcome an exploration of more cross-Government funding. The *Life chances* report states that savings to the NHS and to social care budgets are not part of decisions – at central or local level – about expenditure on equipment and adaptations despite the proven health benefits and this needs to be rectified in the current DFG review.

Individual budgets

One of the central proposals in the *Life chances* report is the introduction of pilots to develop individual budgets which will bring together various sources of funding, services, equipment and adaptations. It is recommended that these pilots also extend to families with disabled children.

Individual budgets may offer an exciting and radical route to greater flexibility, transparency and creative approaches to financing housing adaptations and we would certainly welcome an exploration into this idea. However, the *Life chances* report suggests a target date of 2012 for 'working towards' such system, demonstrating that this is a long term strategy. While adaptations should be explored within pilots for individual budgets, it is also important that urgently needed reforms to the current DFG system are not held back as a result of these moves.

Conclusions

We believe that comprehensive changes to the DFG, based on a cross-Government, invest-to-save model, would signal the Government's real commitment to improving the life chances for disabled children and their families. We look forward to working with the new Office for Disability Issues to ensure that this opportunity to transform family's lives across the country is taken.

Thank you for giving our coalition the opportunity to contribute to this important consultation. We hope you find our response helpful and that it provides the basis for further constructive engagement over the coming months.

Yours sincerely

A handwritten signature in black ink that reads "Neera Sharma". The signature is written in a cursive, flowing style.

Neera Sharma
Principal Policy Officer, Barnardo's