



Community equipment and housing adaptations: draft guidance

Response to the Scottish Government consultation

This is a response to the consultation by the Scottish Government on draft guidance for the provision of community equipment and housing adaptations which will replace existing guidance issued in 2009.

General comments

The Scottish Government has a longstanding commitment to support people to live independently in their own home for as long as possible, and access to equipment and adaptations is key to achieving this. The benefits are well documented, investing in preventative measures such as adaptations can prevent costly admission to hospital or residential care and support better health and wellbeing.

The revision of guidance for equipment and adaptations is welcome. Much has changed since the previous guidance was published in 2009 - the recommendations of the [Adaptations Working Group](#) (AWG) were published in 2012, the integration of housing, health and social care has been progressing since the introduction of the [Public Bodies \(Joint Working\) \(Scotland\) Act](#) 2014. More recently, the Scottish Government has published [Housing to 2040](#), a 20 year strategy for the housing sector, set an intention to enshrine human rights (including the right to adequate housing) into domestic law, and has committed to establishing a [National Care Service](#) to ensure that people are supported to thrive, not just survive.

There is still a great deal of work to be done in implementing the AWG recommendations and we understand the logic of including a separate section for housing and adaptations within the guidance. However, consistency of service and barrier free access to equipment and adaptations should be the key aim of the guidance which will require partnership working and making the most of budgets. As such, we are disappointed that the role of housing receives little mention throughout the rest of the document.

Our response to the consultation questions relating to housing and adaptations is set out below.



Consultation questions

1. Please read the introduction and rate the statements below (Completely, mostly, somewhat, a little, not at all):

Content is clear and relevant: mostly

Content clearly introduces the guidance: mostly

Add your comments here:

The introduction is clear and we welcome the recognition of the contribution that equipment and adaptations can make to supporting people to live well in their own homes. The introduction acknowledges that early intervention and preventative spend provide good value for money. We would therefore welcome increased investment from the Scottish Government, providing certainty that finance should not be a barrier to the provision of equipment or adaptations where these are needed.

The introduction makes reference to a new self-assessment 'Equipment and Adaptations Baseline Assessment Tool' suggesting that this will be key to identifying local actions required to improve services. There is no link to this document and we were unable to find it online. It is therefore impossible to assess whether this document will support the fundamental changes needed to ensure equitable access.

2. Please read the Purpose of the Guidance section and rate the statements below (Completely, mostly, somewhat, a little, not at all):

Content is clear and relevant: completely

Content clearly describes the purpose of the guidance: completely

Add your comments here:

The section is clear and easy to understand.

3. Please read the Core Values section and rate the statements below (Completely, mostly, somewhat, a little, not at all):

Content is clear and relevant: mostly

Content fully covers the issues: mostly



Add your comments here:

The Core Values section states that there should be no discrimination on the grounds of race, disability, gender, age, sexual orientation, religion or belief. Local authorities and health boards already have legislative requirements to ensure discrimination does not occur under these categories. In order for the system to truly be “fair and consistent” there should be no discrimination based on the person’s housing tenure and this should be reflected in the guidance. Currently, people living in different tenures can face different barriers to getting an adaptation. Our work on housing and dementia suggests that people living in the private sector can find it particularly difficult to access advice and information, and can find the process confusing.

4. Please read the Statutory Responsibilities & Policy Context sections, and rate the statements below (Completely, mostly, somewhat, a little, not at all):

Content is clear and relevant: completely

Content clearly describes statutory duties: completely

Add your comments here:

No comments

5. Read the Contribution of Equipment & Adaptations section and rate the comments below (Completely, mostly, somewhat, a little, not at all):

Content is clear and relevant: completely

Content clearly described the contribution of equipment and adaptations: mostly

Key Actions will achieve desired outcomes: somewhat

Add your comments here:

The contribution of equipment and adaptations is well evidenced. We know that investing in prevention and early intervention provides the best outcomes for people and can generate savings by preventing hospital admissions or moves to residential care. This is reflected in the guidance but it does not go far enough to ensure that adequate funding is being provided to meet identified needs.

23. Please read the Adaptations and Housing Solutions section and rate the statements below (Completely, mostly, somewhat, a little, not at all):



Content is clear and accurate: completely
Content clearly describes responsibilities for delivery of adaptations: mostly
Content clearly describes the 'Housing Solutions' approach: mostly
Key Actions will achieve desired outcomes: somewhat

Add your comments here:

Content

The section on adaptations and housing solutions is easy to follow and includes adequate detail but it is disappointing to see housing and adaptations included separately with little reference to the importance of housing solutions throughout the document. This is particularly evident in the section on hospital discharge which only briefly mentions the need to plan for any adaptations needed in addition to equipment. This is disappointing given the significant role that housing plays in hospital discharge and supporting longer term health and wellbeing.

Adaptations are essential to supporting people to live well at home. Often simple solutions can prevent the need for more costly interventions such as hospital treatment or residential care. However, despite the clear need to focus on preventative spend, adaptations are still underfunded and the process for accessing adaptations can be complex with different processes and funding routes depending on tenure.

While our work in this area has focused on older people, it is likely that people of all ages with additional needs may struggle to access the right information and advice if they own their home or rent privately and do not have an existing relationship with the local authority or another organisation that can provide advice about housing. It is therefore essential that information and advice about adaptations is available across all housing tenures.

Local partners such as [Care and Repair](#) services and third sector organisations like [Housing Options Scotland](#) can be a way to reach beyond the social housing sector, but funding for non-statutory services such as these is often under pressure limiting their capacity. Third sector partners need to be better supported with long term funding.

We would also encourage the Scottish Government to support a national conversation on housing and ageing with a comprehensive public communication campaign. Normalising conversations about ageing can help people to think about their own futures, what is appropriate for them, and make them aware of sources of advice and information when they are ready to consider an adaptation or move to a more suitable home.

Key actions

The key actions proposed in the draft guidance are welcome, but the focus must be on implementation to ensure that people who need adaptations can access

them quickly and efficiently. The recommendations of the Adaptations Working Group (AWG) were published ten years ago with little evidence of progress. The percentage of households reporting that they need an adaptation to make it easier to go about daily activities has only reduced by one percent since this measure was first recorded in the [Scottish Household Survey in 2015](#).

The [2020 Scottish Household Survey](#) suggests that 9 percent of households, over a quarter of a million, are still in need of an adaptation.

Having clear guidance in place for adaptations will not make a difference if the resources are not there to provide them. As such, the suggestion that budgets should be pooled and managed through joint governance arrangements is welcome. The proposed Adapting for Change National Action Plan will be instrumental in guiding local delivery and we look forward to seeing this key document. However, as noted above, resources will be needed to deliver adaptations.

The Scottish Government budget for housing association adaptations had been frozen at £10 million for a number of years before a slight increase to £11 million in 2021 despite the Scottish Federation of Housing Associations (SFHA) identifying an [annual shortfall of £7 million](#) in funding for adaptations. The impact of the pandemic has also slowed down the installation of adaptations through local authorities with [2021 housing statistics](#) indicating a 42 percent drop in scheme of assistant grant paid to home owners and a reduction of £7 million paid out in disabled adaptation grants. This backlog needs to be addressed urgently.

The suggestion that minor adaptations should be approved without the need for an Occupational Therapist assessment is welcome and in line with the recommendations of [Adaptations Without Delay](#).

24. Looking at the whole document, please rate the statements below (completely, mostly, somewhat, a little, not at all):

Guidance is straightforward and easy to understand: completely

Guidance offers clarity around roles and responsibilities: somewhat

Guidance will ensure equitable access to equipment & adaptations: somewhat

Add your comments here:

Clarity

Having a summary of key actions at the start of the document is useful. The guidance is clearly set out but, as mentioned above, we would like to have seen the role of housing mentioned throughout the document rather than just set out in a separate section at the end.



Roles and responsibilities

The guidance is clearly set out but working relationships at local level require resources and training to ensure that all staff are aware of their own roles and responsibilities but also about the roles of other staff/departments so that referrals can be made or people signposted to the right services.

Equitable access

Our research into [housing and dementia](#) and the recent findings of the Housing and Dementia Forum (pending publication) suggest that access to adaptations can depend on housing tenure, knowledge of the system and ability to self-fund. People living in the private sector are more likely to face barriers to getting equipment and adaptations and social tenants can face long waits because of the way that eligibility criteria is applied, or lack of funding.

While we think that revised guidance will be helpful, as we set out above, guidance alone will not ensure equitable access if people are not aware of their rights to support, or if there is not adequate resources to provide equipment or adaptations where needs are identified.

25. Please read the Easy Read Summary document and rate the statements below (Completely, mostly, somewhat, a little, not at all):

The executive summary is straightforward and easy to understand: mostly
The document provides a clear summary of the main guidance: somewhat

Add your comments here:

While the Easy Read Summary document is fairly straightforward and provides a summary of the full draft guidance document, the purpose of the summary document is unclear - is this a shorter document to allow service users and others to respond to the consultation more easily, or will this be published alongside the final guidance?

If the summary document is to be published, it would benefit from including information about how to access advice and information about how to access equipment or adaptations.

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org.

Contact:

Ashley Campbell
Policy and practice manager, CIH Scotland
Ashley.campbell@cih.org

06 June 2022