

Appendix 2

Consultation Responses and comments arising

Consultee	Comment Received	CDC Comments/Action
OCC Nigel Homes, Lead officer on Housing Policy for Social & Community Services	<p>Welcomes the policy and the process, especially the involvement of OCC in its formulation.</p>	<p>Noted</p>
	<p>Proposes specific inclusion of review and monitoring arrangements within the policy. Emphasis the need for OTs to be involved in implementation and review. Suggests the Older Persons Accommodation Steering/Implementation Group as an appropriate means of providing governance.</p>	<p>Comment: This is our first DFG Policy and will be kept under active review. The Policy specifically recognises that the assessment procedure and the waiting list mechanism may require changes in light of experience. OTs will be included in review as they are implicitly involved. The Policy is however a CDC document and external governance is inappropriate. DFGs do not relate solely to older people.</p>
	<p>Supports the intention to maximise available capital.</p>	<p>This supports our view</p>
	<p>Supports the intention to seek greater contributions from RSLs.</p>	<p>This supports our view</p>
	<p>Supports the proposal for grant repayment.</p>	<p>This supports our view</p>
OCC Maria Melbourne	<p>Emphasises that property location and site are key factors in determining suitability for disabled people and must be accorded more importance in the decision as whether or not adaptation is appropriate.</p>	<p>Agreed. Revision made to section 7.1.3</p>
	<p>Proposes that reserve grants are held to address emergencies such as supporting discharge from hospital of terminally ill individuals or to avoid admission.</p>	<p>Noted. The Council has a discretionary grant which is used for precisely this purpose.</p>
	<p>Proposes that the policy stresses the need for close working with RSLs and the use of CBL.</p>	<p>Noted. We believe this is already implicit in the policy and the proposal to seek their support for the policy (4.3). Section 7.1.6 has however been amended to include specific reference to CBL.</p>

Proposes that RSLs should implement the same eligibility criteria for adaptation and the same means testing as are used for other applicants.	Noted. This is specifically proposed at 4.3
Supports inclusion of reference to joint Oxfordshire Grant Aided Home Adaption booklet and the common process followed.	Noted
Recommends that adaptation should not support overcrowding (see also point 17 below).	Agreed. 7.2.2 revised to make this more explicit
Emphasises the need for good communication between all agencies dealing with incoming referrals.	Noted. We agree, but this is more a matter of practice than policy.
Emphasises the need for effective early assessment of all relevant social and health needs (triage).	Noted. This is already specifically addressed (see sections 7.1.1 & 7.1.2)
Recommends that the cheapest adaptive options are considered first.	Noted. Already addressed in 7.2.2
Recommends use of a DFG panel to consider more complex or costly adaptations.	Noted. Already included in 7.1.1
Suggests consideration of a contract for stair lifts to reduce costs.	Noted. This is more a matter of practice than policy. It has already received consideration and been rejected
Asks whether an appeals process is required in relation to DFG decisions and what response timescales it would work to.	Comment. The legislation provides no appeal mechanism. The right to seek Judicial Review remains in place. Complaints will be addressed in accordance with the Council's Complaint procedure. We judge that no additional route is required
Recommends the inclusion of dignity and safety in the list (7.1.2) of the Council's decision making expectations.	Noted. We judge these criteria to be implicit in the assessment procedure included in the policy and the OTs assessment.
Recommends revision of text dealing with presumption against level access showers above ground floor so that the stated exception is further qualified to take account of cheaper cost alternatives.	Agreed. Revision made to 7.2.2
Recommends the inclusion of a further expectation that DFGs should not be provided in the case of an RSL tenant transferring	Agreed. Revision made to 7.2.2

	from an adapted to an un-adapted home.	
	Suggests specific inclusion of 'whether owner-occupiers or private tenants' in para 7.1.3 to add additional emphasis.	Agreed. Revision made to 7.4.1
	Recommends that overcrowding is specifically included in para 7.2.1 (see also point 6 above).	Agreed. Revision made to what is now 7.2.2
	Para 7.22: Emphasises that client's will need best possible information about likely waiting times to help inform their decisions.	Agreed. Revision made 7.1.5 to re-emphasise.
	Suggests inclusion of statement that it is inappropriate for high risk cases to wait.	Noted. We believe the need to respond as quickly as possible to those with the greatest need is implicit in the policy.
OCC Clare Tall, Acting Unit Manager, OT Team North	Para 6 of consultation draft: Suggests replacement of ' aspirational needs' with 'level of need', and notes that OTs only recommend essential facilities.	Noted. We believe that the original text is appropriate in seeking to make the point that addressing need is not always the same as meeting aspirations.
	Para 7.1.1 Raises a number of questions in relation to process and decision making rather than policy.	Noted. Not policy issues
	Para 7.1.1 Raises question about use and availability of FHIL.	Noted. Not policy issues
	Para 7.1.2 Seeks clarification of ' last sentence para 1.	Noted. Text revised to improve clarity
	Para 7.1.2 recommends inclusion of referring OT on assessment panel.	Noted. Already included.
	Para 7.1.2 bullet-point 1, Notes that fully meeting assessed needs is not always achievable.	Agreed. 7.2.2 revised to reflect this.
	Para 7.1.2 Questions whether the stated expectation that the Council will provide facilities on the ground floor unless impractical or more costly is realistic, siting possible need to provide new facilities and sleeping provision.	Noted. We judge that the policy already provides appropriate flexibility on this issue.
	Para 7.1.2 Stresses the need to seek the most cost effective solution when considering reordering of space.	Noted. We judge that the policy already provides appropriate flexibility on this issue.
	Para 7.1.2 Recommends review of text dealing with presumption against level access showers above ground floor so as to provide	Agreed. Text of what is now 7.2.2 revised

	more clarity.	
	Para 7.2.1 Seeks clarification of which Council, CDC or OCC (para 5) and asks whether the proposed delay in entry onto waiting list is justified.	Agreed. Footnote added to page 1 to confirm Council refers to CDC. Proposal to delay entry to waiting list removed. Para 7.5.6 revised
	Para 7.2.2 Queries which date will be used for waiting list, referral or final assessment.	Noted. Revision above has made this issue irrelevant.
	Para 7.2.2 proposes that decision to take cases out of strict order should be made in consultation with OT staff.	Noted. However, we judge this to be a CDC process issue
Age UK Bee Myson, Manager, Banbury Centre	Recommends making specific reference to links with Older People.	Noted. However, we judge this inappropriate since this is not just an older people issue.
	Recommends policy is written in layman's language and avoids jargon.	Agreed. Text has been reviewed and revised to add clarity.
	Proposes that expectations of timescales and financial implications are explicit from the outset to help manage expectations.	Noted. This is already implicit in the policy especially 7.1.5
	In response to the specific question asking whether it is appropriate to award a DFG when the premises is under-occupied advises that: Although fair to include discussion of moving when considering adaptive needs of under-occupied property, it is inappropriate to expect it. Factors such as support networks are relevant. Recommends that each case must be assessed on the basis of objective criteria which take account of individual need. Tenure should not itself be a factor in proposing a move.	Noted. The policy makes decision-making subject to a number of presumptions. The facts of each case will be relevant. No revisions are judged appropriate.
	Supports proposal to seek greater contributions from RSLs.	Noted
	Stresses need to ensure that extra demands should not deter RSLs from taking tenants with DFG needs	Noted
	Suggests minimum annual review for those on waiting list, with review in the event that condition changes. Believes that waiting time should confer additional priority.	Noted. A specific review period is judged inappropriate in terms of OT resources. Any change in circumstances will however generate a re-assessment (as at present). We have concluded that the waiting list will only take account of assessed need.

	Stresses need for good links with other agencies and arrangements for their proactive early involvement.	Noted.
	Suggests annual review of DFG criteria to take account of legislative issues, social climate, demand and budget. Noted. As a new policy this will be under constant review to ensure	Noted. This is our first DFG Policy and will be kept under active review. The Policy specifically recognises that the assessment procedure and the waiting list mechanism may require changes in light of experience.
A2Dominion Mark Butler, Area Housing Manager- North	In response to the specific question asking whether it is appropriate to award a DFG when the premises is under-occupied: Does not consider award of a DFG appropriate, especially in the social-rented sector because this does not make best use of in-demand family homes, and because demand can ultimately lead to future removal of adaptations.	Noted. This supports our view
	Suggests that provision of appropriate advice at an early stage will facilitate moves. Believes that clients are often reluctant to move because they start by being told adaptation can be done. Proposes involvement of a Specialist Housing Advisor.	Noted. This supports our view
	In response to the specific question asking whether it is appropriate to build extensions if a move could meet physical need: Extension should be last resort since they use a disproportionate amount of the DFG budget.	Noted. This supports our view
	Suggests the use of modular buildings.	Noted. This is a process issue rather than policy
	In response to the specific question asking how much weight should be given to applicants' wishes to remain in their current home when alternatives are available: Suggests that the Council fund the cheaper option	Noted
	In response to the specific question asking about the extent of RSL commitment we should be seeking: Co-funding agreements should be sought for all RSLs.	Noted. This supports our broad view
	Proposes a cap of £5k funding in each case if RSLs are to be asked to pay 50% contribution.	Noted
	Supports proposal to means test RSL tenants (but believes this may result in some RSLs seeking DFGs who do not do so at	Noted. This supports our broad view

	present).	
	In response to the specific question asking whether clients on the waiting list should receive additional priority to reflect time waiting: Believes this should be the case to avoid some applicants waiting indefinitely.	Noted. We have concluded that assessed need will be the only criteria.
Paradigm Geoffrey Grigg, Regional Manager	In response to the specific question asking whether it is appropriate to award a DFG when the premises is under-occupied: Generally supports this approach but considers that factors such as location and access to support services need to be taken into account. Asks whether incentives such as removal costs would be available.	Noted. This supports our view
	In response to the specific question asking whether it is appropriate to build extensions if a move could meet physical need: Believes that extensions have the benefit of meeting need without adding to the pressure for larger properties which are already at a premium..	Noted. There are cases in which extension is appropriate, but that decision will only be reached after consideration of all options and factors
	In response to the specific question asking how much weight should be given to applicants' wishes to remain in their current home when alternatives are available: No firm view but factors such as location and access to support services are again relevant (see point 1 above).	Noted. This supports our view
	In response to the specific question asking about the extent of RSL commitment we should be seeking: Confirms Paradigm's preparedness to receive nominations for prospective disabled tenants.	Noted
	In response to the specific question asking whether clients on the waiting list should receive additional priority to reflect time waiting: Proposes that waiting list should reflect assessed need only unless there are 'blocking' issues.	Noted. This supports our broad view
	Paradigm Disabled Facilities Officer	In response to the specific question asking whether it is appropriate to award a DFG when the premises is under-occupied: Under-occupancy has a negative effect on the community. Moving is preferable but should be offering positives and not forced.

	In response to the specific question asking whether it is appropriate to build extensions if a move could meet physical need: Asks if this is achievable. Raises question about relative waiting time for move compared with grant..	Noted. There are cases in which extension is appropriate, but that decision will only be reached after consideration of all options and factors
	In response to the specific question asking how much weight should be given to applicants' wishes to remain in their current home when alternatives are available: Considers factors such as location and access to support services are relevant. Noted. This supports our view	
	In response to the specific question asking about the extent of RSL commitment we should be seeking: Confirms that RSL contribution is becoming more common and that a number of agreements to contribute financially are already in place.	Noted
	In response to the specific question asking whether clients on the waiting list should receive additional priority to reflect time waiting: Does not support this approach.	Noted. This supports our view
Charter Community Housing Harjinder Lota, Managing Director	In response to the specific question asking whether it is appropriate to award a DFG when the premises is under-occupied: Considers this inappropriate. Advises that incentives should be used where possible, that proposing alternative accommodation is likely to be difficult to achieve for private property, but that the need to achieve best use of resources.	Noted. This supports our view
	In response to the specific question asking whether it is appropriate to build extensions if a move could meet physical need: Advises that moves should be actively considered rather than extending.	Noted. This supports our view
	In response to the specific question asking how much weight should be given to applicants' wishes to remain in their current home when alternatives are available: Suggests that a maximum grant of £10k might be applied if an applicant was not prepared to move where that was otherwise appropriate	Noted. This approach is not judged to meet legal obligations.
	In response to the specific question asking about the extent of RSL commitment we should be seeking: Supports RSL contributions. Suggests that RSLs should provide for the cost of all	Noted. The proposal for RSL contribution will be a subsequent piece of work.

	minor adaptations up to £750. For other adaptations, a maximum contribution of £10k per property.	
	In response to the specific question asking whether clients on the waiting list should receive additional priority to reflect time waiting: Suggests that additional priority should be given after a 6 month wait.	Noted. We have concluded that assessed need will be the only criteria.
	Supports the proposal that RSL tenants should be means-tested to achieve a more consistent approach.	Noted. This supports our view
	Supports the proposal that adaptations should not be removed and confirms CCH have a policy not to do so following re-letting.	Noted.
	Advises that RSL contributions should apply only to their own stock.	Noted. The proposal for RSL contribution will be a subsequent piece of work but we are likely to agree.
	Supports the proposal to recover grant where applicable	Noted. This supports our view
	Suggests that the threshold for minor adaptations is reduced from £1000 to £750.	Noted. We have no such proposal at this stage