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Housing and disabled people: the role of local authorities

Lorna Adams, Sam Morris, Dominic Thomson, Helen Rossiter, Jonnie Felton, Phil Newbold and Zainab Hazel (IFF Research)

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Post: Research Team
           Equality and Human Rights Commission
           Arndale House
           The Arndale Centre
           Manchester M4 3AQ

Email: research@equalityhumanrights.com
Telephone: 0161 829 8500
Website: www.equalityhumanrights.com

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Contents

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Executive summary

Introduction

In 2017 the Equality and Human Rights Commission conducted an inquiry on housing for disabled people in Britain. The inquiry investigated the availability of accessible and adaptable housing, the support services around it and the extent to which the rights of disabled people to live independently are being fulfilled.

To inform this inquiry, we asked all local authorities across Britain to complete an online survey about their provision of housing and related support to disabled people. Eighty-three per cent of them did so. This research report highlights the areas in which local authorities perform well and less well. The findings suggest that local authorities are struggling to meet the housing needs of disabled people in a very challenging policy and funding environment. The data they hold, both on disabled people and their own housing stock, is typically poor; local authorities do not build enough accessible homes and disabled people experience long waits either to be allocated an accessible home or to have an adaptation installed in their existing one. There is also significant variation in local authorities' performance. The key findings explore these themes in more detail and by devolved nation.

Key findings

1) Local authorities lack the information to house disabled people properly

- There are major self-assessed data gaps in relation to both disabled people's needs and the accessibility of housing stock. Less than one in five (16%) authorities felt their data was 'good' or 'very good' for the purposes of estimating the number of disabled people currently inappropriately housed. Less than a tenth (9%) of authorities felt they had a 'good' or 'very good' idea of the proportion of privately owned housing that is accessible.
- Two-thirds (65%) of local authorities are unable to estimate the proportion of social and/or affordable housing that is accessible, and only around one in five

(22%) have an accessible housing register. This is higher in Wales (52%), where the use of registers is actively encouraged, and in London (42%), where the London Plan requires all homes to be built to accessible standards.

- In spite of this lack of information, around nine in ten (89%) consider themselves to be either very or quite successful in allocating appropriate housing to disabled people with specific impairments.

- This lack of information matters when setting policies and spending priorities. Planning policies across the UK require local authorities to support their targets with evidence. In England, unless a local authority can produce reliable data demonstrating local need for accessible housing, the default position is that the developer need not build any at all.

2) There are long delays in allocating accessible homes

- The average length of time that applicants for accessible homes spend on the local authority housing register is in excess of two years (25 months), compared with 27 months for those applying for general housing. Fewer than half (42%) of local authorities were able to report how long disabled people waited.

- In spite of the long waiting times that disabled people experience, local authorities rate their own performance highly. Ninety-four per cent of authorities believe themselves to be very or quite effective in their assessments of the housing needs of individual disabled people.

3) Local authorities' regulation and oversight of planning is weak

- Only a third (32%) of authorities agreed that developers are normally fully compliant with accessibility regulations. Despite this low level, only seven authorities (3%) had taken either formal or informal action against a developer who did not deliver the required number of accessible and/or adaptable properties to the standard required in the last three years.

- Most local authorities do not set targets for accessible housing. Just over a quarter (28%) have a general percentage target currently in force. Sixteen per cent said that they do not ask developers to provide accessible housing at all.

- Just 6% of local authorities monitored their accessible homes target to ensure it had been achieved.

- Viability assessments are used to determine whether a site development is financially viable. Many local authorities saw these as a significant challenge when trying to get developers to build more accessible homes, and assessments

frequently resulted in fewer accessible homes being included in plans because developers were concerned about low property sale prices or high land values.

4) Disabled people face lengthy waits to have adaptations installed and many are not getting the support they need

- On average, it takes local authorities five months (22 weeks) for adaptations to be approved and installed. Some local authorities performed very poorly: three authorities said people faced a waiting time of 18-months or longer. Some acted much more quickly, however. Authorities said they struggled to find reliable sub-contractors (38%), lacked the staffing capacity to deal with applications (32%), or that the system was too complex for applicants (31%).

- In general, there is a high level of acceptance of adaptation grant applications, and many local authorities routinely awarded the full costs of adaptations. However, some authorities behave differently: 6% of authorities in England reject more than a quarter of all applications made for adaptations. Welsh and Scottish authorities were less likely to reject applications.

- The most common reason given by local authorities for refusing applications was the means test. This test, set at a national or devolved government level, was widely criticised by local authorities as being arbitrary and complex. Landlord consent also remains a significant issue in England and Wales (although less so in Scotland).

- About four fifths (78%) of local authorities provide optional tenancy support to assist residents to remain in their existing homes (either the council's own social housing or more widely). However, only a quarter (25%) of authorities believe that they are fully meeting demand. Many consider this to relate to a lack of budget or funding limitations (28%), or to a lack of service capacity compared with demand (22%).

5) Local authorities' performance is variable

- A key finding of this research is the large variability in the performance of local authorities on numerous measures, ranging from setting housing targets to timely delivery of adaptations. This suggests there is scope for local authorities to learn from one another.

- Those authorities that are more successful in delivering housing for disabled people tend to be located in specific parts of Britain, suggesting that the policies and practices of national and devolved governments play an important role. Local authorities in Scotland and London, for example, generally feel better supported

in terms of data compared others across Britain. Two-thirds (62%) of Scottish authorities have commissioned in-house surveys, compared with a third (35%) in England. These areas are also more likely than average to be able to state the proportion of local housing which is accessible (52% in Scotland and 46% in London, compared with 30% across Britain).

- In London, the role of the Greater London Authority in providing data and encouraging high accessible housing targets is quite visible: 84% of London authorities set targets, and many (although not all) require 100% accessible housing, in line with the London Plan.

- In Wales, a drive to establish accessible housing registers has had a significant impact, with 52% of local authorities making a register available. In both Scotland and Wales, devolved governments have also pushed social housing providers to deliver more accessible and/or adaptable housing than required in planning rules, independently of local authorities.

- Small local authorities struggle to deliver in some areas and large authorities appear to benefit from important economies of scale. Authorities with larger populations were far more likely to have in-house specialist assessors trained to handle applications for housing from disabled people (78%) than local authorities with fewer than 100,000 residents (22%). Authorities with larger populations were also more likely to hold accessible housing registers (35% compared with12%).

Conclusion

This research has found that local authorities' performance in delivering housing for disabled people is patchy, and often inadequate. Of particular concern are the long waiting times that disabled people face, as well as the weak regulatory framework and oversight of the building of accessible homes. Local authorities operate in a difficult environment and the variation in performance by region and devolved nation shows that support from other tiers of government matters a great deal.

Variation in performance between districts in the same county or city can be wide, with disabled people in one district of a county waiting more than a year for an adaptation, while others just a few miles away wait only a few weeks. There is much scope for local authorities to learn from each other, and to improve disabled people's experience of seeking housing.

1 | Introduction

1.1   Background

The Equality and Human Rights Commission has carried out a major inquiry on housing for disabled people. The inquiry investigated the availability of accessible and adaptable housing, the support services around it and the extent to which the rights of disabled people to live independently are being fulfilled.

The aim of the survey described in this report was to support the inquiry's aims by gathering evidence and opinion from local authorities on their provision of housing and related support to disabled people. The survey was necessary because, despite the fact that local authorities have a central role in the provision of housing to disabled people in Britain, there was previously only limited information available on their activities in this area, and most of what was publicly available was not collated or provided in a consistent format.

1.2   Research objectives

The survey aimed to gather responses from a large proportion of local authorities across Britain regarding their work in ensuring disabled people are able to find suitable housing. In total a response rate of 83% was achieved, rising to over 90% in Scotland and Wales, allowing statistically meaningful reporting for these nations, as detailed in Chapter two (methodology).

Local authorities in Britain have responsibility for a variety of activities that may determine disabled residents' ability to obtain suitable housing:

- direct provision and allocation of social housing for those unable to afford to rent or buy in the housing market

- setting strategic housing policy, to determine the local requirement for accessible and adaptable homes of all tenures, including for sale

- enforcing planning policy for new developments, to ensure that developers deliver the required number of accessible and adaptable homes

- administering grants available to disabled people to make their homes accessible and suitable for their needs, and

- delivering support to disabled people to sustain both social rented and private rented tenancies.

More information on the responsibility of local authorities, and the different types of local authority surveyed across Britain, is contained in Chapter three.

The survey covered all the issues listed above, enabling conclusions to be drawn on local authority performance. The report seeks to identify local authorities' areas of weakness and strength, and also to scope out the constraints under which local authorities operate, and which of these are most important.

1.3   Broad survey methodology

The survey was carried out exclusively online, but with extensive postal, telephone and email contact also taking place to ensure local authority participation. Phone and email support was available from IFF Research staff to help local authorities participate. The survey was quantitative in nature but also included opportunities for local authorities to provide detailed feedback on specific issues. More detail on the survey methodology is provided in Chapter two.

1.4   Report structure

The remainder of the report is structured as follows:

- Chapter two: Methodology
  A brief description of how the survey was carried out, and how the data was analysed and interpreted, with further detail provided in Appendix A.

- Chapter three: Who needs accessible housing?
  This focuses on local authority understanding of the number of disabled residents in their area, their impairments or accessibility needs, how local authorities communicate with disabled residents, and how they assess need for accessible housing.

- Chapter four: Matching homes to the people who need them
  This covers the local authority's knowledge of the local housing stock's suitability for disabled people, and how the needs of disabled people are taken account of in the allocation process.

- Chapter five: Building new accessible homes
  This covers the local authority's role in delivering new homes suitable for disabled people, considering both housing policy and enforcement through planning policy.

- Chapter six: Helping disabled people to live independently in their existing home
  This explores local authorities' contribution to supporting disabled residents with grants for adaptations and advice to maintain existing private and social rented tenancies.

2 |
Methodology

2.1   Response rates

Organisations eligible to take part in the survey

The target audience chosen for the survey was all local authorities in England, Scotland and Wales, a complete list of which is readily available from the Office for National Statistics. In some areas of England, a two-tier structure of local authorities exists, where some services are delivered at the lower tier level (by district councils), and some at upper tier level (by county councils). Most of the relevant services are delivered by district councils, in particular housing and planning. Therefore, it was decided to target lower tier (district) authorities rather than upper tier authorities (counties).

In Scotland and Wales, only one tier of local government exists, and so all local authorities in these nations were contacted.

Most district or unitary local authorities in Britain are in England (326 of 380, or 86%). This is partly due to the comparatively small population of Scotland and Wales, but also because local authorities in these nations are generally larger than in England.

Some authorities, mostly in England, operate either partly or wholly as shared services, where one organisation delivers services covering multiple local authority areas. This enables them to take advantage of economies of scale which would usually only be available to much larger authorities. Because there is no central register of shared services, it is impossible to be definitive about the exact number of these.

Based on our contact with local authorities, however, we know there are at least 18 shared services in England, representing 38 local authorities. These are counted in this research in terms of the number of constituent local authorities, regardless of whether they submitted separate responses for each authority or a joint response for all authorities in the service.

The distribution of local authorities by nation and type is shown in Table 2.1.Lower tier districts made up more than half of respondents (58%), and single tier authorities in England another third (33%). Less than a fifth (16%) of respondents were located in Scotland or Wales, even though the response rate in these nations was higher than in England (see Appendix A).

Table 2.1 **Distribution of responses, by nation and type of authority**

Nation / Type	Authorities (number)	Authorities (%)
England (all types of authority)	267	84%
Lower tier (District)	162	58%
Single tier (all types)	105	33%
Unitary District	47	15%
Metropolitan District	32	10%
London Borough	25	8%
Others	1	*
Scotland (Unitary Authorities)	29	9%
Wales (County Boroughs)	21	7%
Total	317	100%

Response rates

Table 2.2 shows the overall response rate to the survey by nation and type of local authority; more detailed statistics on response rate, including standard error margins for these groups, is shown in Appendix A. In total, 317 local authorities completed the survey, a response rate of 83%. This rose to 91% of authorities taking part in Scotland and 95% in Wales. In both these nations, all local authorities are unitary, so no figures are presented for different local authority types.

Although the sample for Scotland and Wales is small, the response rate in these nations was very high, and therefore error margins are small enough to allow detailed analysis by nation (see Appendix A for more detail).

Table 2.2   Response rate, all GB and by nation and type of authority

	Number of authorities eligible for the survey	Number of authorities responding	Response rate (%)
All eligible local authorities, GB	380	317*	83
All authorities, England	326	267	82
Lower tier district authorities	201	162	81
Unitary authorities (all types)	125	105	84
Unitary District	55	47	85
Metropolitan District	36	32	89
London Borough	32	25	78
Others	2	1	50
All authorities, Scotland	32	29	91
All authorities, Wales	22	21	95

The size of local authorities in terms of the size of the population in the local area varies greatly, as the structure described above would suggest. The areas covered by local authorities included in the survey varied in population size from a few thousand to in excess of one million people; however, about half (45%) had between 100,000 and 200,000 people. The broad distribution of authority sizes is shown in Table 2.3.

Clearly, population size will have a significant effect on the scale of local authorities' funding, and so potentially on their behaviour regarding provision of housing and support to disabled people. Specifically, due to their greater size, large authorities will benefit from economies of scale, such as the ability to employ dedicated and specifically trained staff for a specialist function.

Table 2.3   Distribution of responses, by population size of authority

Population	Authorities (number)	Authorities (%)
Less than 100k	93	29%
100k – 200k	142	45%
200k or more	82	26%
Total	317	100%

Base: GB (317), England (267), Single tier (105), Lower tier (162), Scotland (29), Wales (21)

Taking into account the size of population resident in each authority (according to the 2011 Census), rather than purely the number of authorities covered, the survey results relate to geographic areas in which 84% of British residents live.

In England, size of local authority population has a close relationship to local authority type. Only 3% of single tier authorities in England have fewer than 100,000 residents, compared with nearly half (44%) of lower tier authorities, as shown in Figure 2.1. Unitary authorities in England generally have more than 200,000 residents.

In Scotland and Wales, however, there are significant numbers of both small and large unitary authorities.

Figure 2.1 **Nations and local authority types: relationship with population size**

Base: GB (317), England (267), Single tier (105), Lower tier (162), Scotland (29), Wales (21)
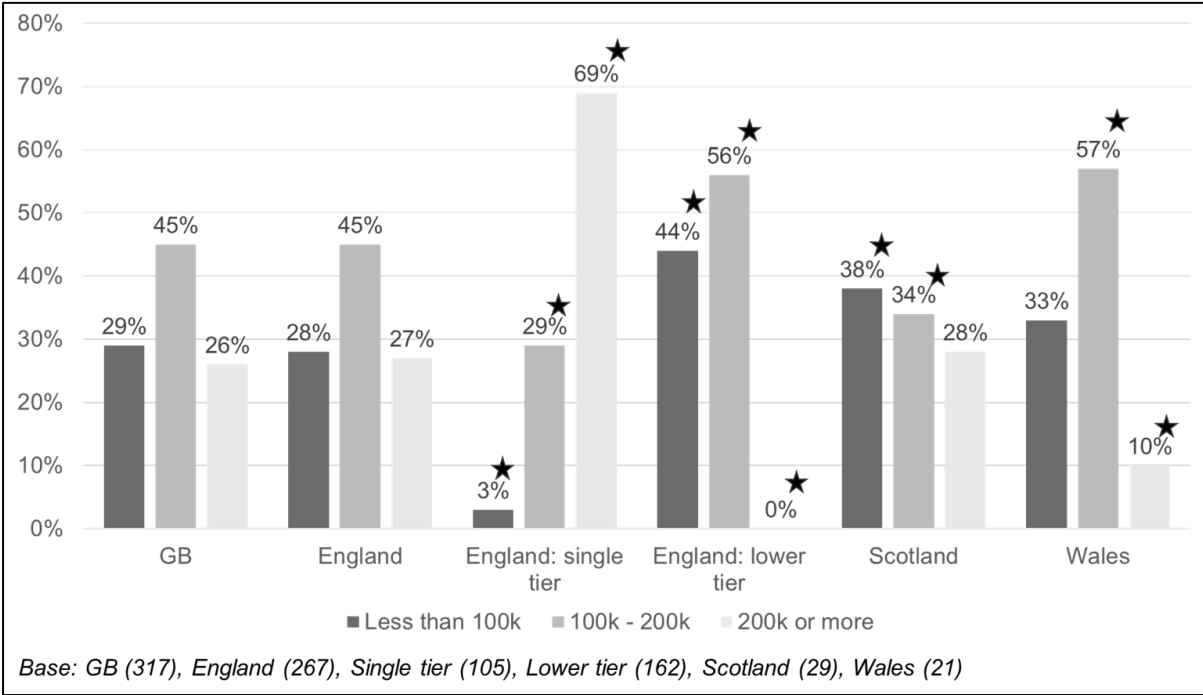
2.2   Survey method

Sample building

Within local authorities, typically the services relevant to providing housing to disabled people would be delivered across multiple departments, and in some cases across multiple organisations.

To tackle this potential problem, a 'lead respondent' within each authority was sought out to co-ordinate their response. This would normally be a person with a sufficient

overview of services and the authority to delegate filling in sections of the survey, or to order the preparation of data. Typical job roles for a lead respondent might be 'Housing Director' or 'Housing Strategy Manager'. Depending on the structure of the organisation, the lead respondent tended to work in a department with responsibility for housing strategy, or alternatively strategic planning.

Initially, a person thought to be an appropriate lead contact was located through a sample building exercise, looking at council websites and documents to find contact details for the appropriate person. These individuals were then contacted with phone calls to expand the number of local authorities with an identified lead contact.

The sample building exercise also included the collation of postal addresses and switchboard numbers for local authority head offices, to aid in mailouts and phone calling.

Online survey

The survey was carried out online, via a secure interviewing system hosted at IFF Research; this method was preferable primarily due to its flexibility. Unlike a telephone or face-to-face interview, an online survey easily allows multiple sessions, and can be completed at any time convenient to the respondent. Given that the survey requested data that might be held by multiple departments and not readily available, this was particularly important.

Although the survey was exclusively carried out online, participation in it was encouraged via a variety of methods including phone, email and by post.

The survey was opened with a postal mailout to the identified lead contact on 20 July 2017. In cases where no lead contact was identified, it was addressed to the Housing Strategy / Policy Team at that local authority. This letter was followed up with a multi-stage process to maximise survey responses:

- An automated email to all 380 authorities on 24 July, with pro-active following up of bounced emails
- An initial manual email on 31 July – 1 August to all authorities who could not be confirmed to have either read the email or logged in to the survey, to ensure that authorities filtering out automated emails were not missed
- Ongoing phone calling from that point onward throughout the fieldwork period
- Ongoing email contact via a dedicated mailbox
- A manual email on 21 - 22 August

- A further postal mailout on 24 – 25 August, addressed in all cases to the Housing Strategy / Policy Team to cover the possibility that the lead contact might be incorrect or uncooperative
- A manual email on 6 September
- A final reminder email on 11 September

Efforts were also made to accommodate the circumstances of individual authorities, for example assisting in forwarding emails where multiple organisations were involved, or allowing some responses to be submitted via email rather than through the online survey. In total the fieldwork ran for around eight weeks.

Provisions were also made for local authorities operating a shared service (where local authorities jointly provide some or all services) to either submit multiple surveys for each authority in the service, or to submit a single joint response for the entire service.

Throughout the process Scottish and Welsh local authorities were prioritised for telephone contact because of the greater difficulty of obtaining a statistically significant response in these nations where the number of local authorities is quite small.

2.3   Analysis techniques

The data gathered from the survey was processed to remove errors and ensure satisfactory data quality, to produce a data file and tables for analysis. Data from shared services was duplicated as necessary to produce data which allows results to be expressed in terms of a number of local authorities, rather than organisations. These outputs are the primary source of information for this report. The data and tables enable the production of headline results for all local authorities and each nation, and the analysis of differences between sub-groups of local authority.

All percentages are presented rounded to the nearest whole number. Where multiple percentages are added together (for example, the percentage saying a service is very good and fairly good, to produce a total 'good' figure), unrounded figures are used for the calculation. The total percentage shown may therefore differ slightly from the total of the rounded constituent figures. Where differences between sub-groups are mentioned in this report, these are always statistically significant at a 95% confidence level. In tables and charts, statistical significance is indicated with a star (*).

The devolved status of Scotland and Wales does mean that housing and planning policy varies substantially, particularly in Scotland where this policy area has been devolved for longer. Significant differences between nations cannot, therefore, be assumed to reflect variation in local authority performance, since it may be due to the differing environment in which they operate.

2.4   Limitations

Although a large enough sample was achieved to ensure statistical robustness, data was, of course, only obtained from willing participants in the survey. It is possible that the local authorities not participating might show different behaviour to those that did respond. In particular, those local authorities with the most limited resources or with the least interest in the issues discussed might be less likely to take part.

In addition, some authorities might have had lead respondents who were better placed to complete the survey than others, in terms of knowledge or time. Others might have faced barriers in terms of individual services being outsourced or provided by a county level authority. It should therefore be remembered when interpreting survey results that when an authority says they don't know the answer to a question, this may be as a result of a lack of knowledge or time on the part of the lead respondent, rather than the local authority as a whole not holding the information.

The research was conducted in the context of a formal inquiry under section 16 of the Equality Act 2006, which gives the Equality and Human Rights Commission the ability to compel organisations to provide it with information. While these powers were not used, local authorities were made aware of them and might have felt under pressure to respond. Responses to the questionnaire were not anonymous but have been kept confidential.

3 |
Who needs accessible housing?

3.1 Introduction

Local authorities have a key role in the provision of accessible housing, as a planning authority, as a facilitator of the provision of social housing, and in some cases as a direct provider of council housing.

But to provide housing which matches disabled peoples' needs, local authorities need first of all an understanding of the proportion of disabled residents, and their existing circumstances and needs. Local authorities also need a level of knowledge of the extent to which the housing stock in place already caters to disabled people's needs. The survey asked a number of questions which sought to understand in detail any gaps in data quality and availability.

3.2 Background: housing provision

Some local authorities in Britain are also landlords ('stock holding' local authorities), providing social rented housing, allocated on the basis of need and let at regulated rent levels, set by the Homes and Communities Agency (HCA). This is often referred to as council housing. Usually this housing is managed and maintained by the local authority itself, although in a small number of cases this responsibility can be sub-contracted to an Arms' Length Management Organisation (ALMO).

However, providing council housing is not a universal obligation: many local authorities do not provide it. In these areas, a similar quantity of housing is typically available at HCA regulated rent levels, but the dominant social landlord would instead be a Private Registered Provider (PRP in England) or a Registered Social Landlord (RSL in Scotland or Wales). Typically, PRPs and RSLs are charitable Housing Associations. These social landlords also operate in stock-holding local authorities, although typically on a smaller scale. Even in areas where council

housing exists, most new social housing is typically constructed by, or for, PRPs or RSLs.

Table 3.1 shows that local authorities in Scotland are much more likely to own council housing. There is also a strong link to authority size: 80% of authorities with a population of 200,000 or more responding to the survey said they owned council housing, compared with 48% of those with a population of less than 100,000.

Table 3.1   **Housing provision, by nation and size of authority**

	Authorities owning housing (number)	Authorities owning housing (% of authorities)
England	156	58%
Scotland	23	79%*
Wales	11	52%*
Total	190	60%
Up to 100k population	45	48%*
100k to 200k population	79	56%
200k or more population	66	80%*

Base: GB (316), England (266), Single tier (105), Lower tier (161), Scotland (29), Wales (21)

This variation has wide relevance to the way in which respondents will experience issues around housing and disabled people; stock-holding local authorities directly provide and modify properties, while other authorities work solely to facilitate housing provision through regulation and relationships with other organisations.

3.3   Background: facilitating housing delivery

Importantly, local authorities who have transferred their council housing continue to have a stake in the provision of affordable housing in their area, and an interest in facilitating its continued provision. In almost all cases, they still oversee the allocation of all social housing in their area, even if they do not provide it themselves (see Chapter 4). They also remain legally responsible for ensuring that homeless people receive housing (a responsibility known as the Main Homelessness Duty), which has motivated many to introduce advice and support services for residents (see Chapter 5).

Finally, all local authorities are responsible for ensuring that new housing delivery in their area – of all tenures of housing, including private market housing built by commercial developers – is broadly in line with the area's needs. They are expected to achieve this goal through granting or withholding planning permission for specific developments.

Local authorities can make various requirements of developers as pre-conditions for receiving planning permission to build new housing. At the broadest level, they can set percentage targets for accessible/adaptable housing over and above mandatory targets which apply to most new housing developments, subject to negotiation on a development-by-development basis. For example, a local authority might have a blanket requirement that 5% of housing in new developments be suitable for a wheelchair user. However, they do not have complete discretion in this area; they must back up any demand made to a developer with evidence, gathered in a housing market assessment.

This assessment is referred to by different terms in each nation: the Strategic Housing Market Assessment (SHMA) in England, the Local Housing Market Assessment (LHMA) in Wales and the Housing Need and Demand Assessment (HNDA) in Scotland.

Almost all local authorities said they have a housing market assessment in place. In England, 97% of authorities have an SHMA. All authorities in Scotland have a HNDA, and all but one of the authorities in Wales said they had an LHMA. The housing market assessment in all three nations is intended to include information on the requirement for housing for disabled people. If this information is not included, it would be difficult for a local authority to defend a challenge to any requirement to provide it. The survey included a number of questions which explored the extent to which this information is included in practice and why.

3.4   Data for housing market assessments

Authorities were asked to indicate which sources of data they currently use to assess the need for accessible and adaptable housing in order to put together their housing market assessment. The overall results are shown in Figure 3.2.

Of the 305 authorities who said they undertake a formal housing market assessment, each used on average 3.1 sources for their assessment. Three-quarters (75%) used census data to assess the accessible and adaptable housing needs in the population. This is more than double the number of authorities who indicated that

they consult findings from their own local household surveys (37%) – the second most frequently mentioned source of data used by authorities for the purpose of their housing needs assessment. About one-fifth of authorities used data collected from people registering with the council with an impairment or condition of some description (22%).

Roughly one-fifth of authorities incorporated data from a social housing provider (21%), and a similar proportion used DWP Disability Living Allowance claimant data (21%).

PIP and NHS and Department for Health data was less commonly used (15% each).

It is notable how few authorities (37%) collected their own data through a survey when, as noted previously, most rated the external data available to them as poor. This suggests that overall the evidence base for housing market assessments is quite weak.

As shown in Table 3.2, authorities in Scotland were more likely to use locally commissioned household surveys (62%), NHS data (55%) and social landlord data (55%) compared with the average authority in the sample. This suggests that authorities in Scotland, supported by the central government unit the Centre for Housing Market Analysis (CHMA) are more likely to consult a greater number of sources of data to support their housing needs assessments. Indeed, on average, Scottish authorities consulted 5.9 data sources, compared with 3.7 for Welsh authorities, and just 2.8 for authorities in England.

Figure 3.1 **Which of the following sources of data does the authority use for assessing the need for accessible and/or adaptable housing for the authority's housing market assessment?**

Base: GB, all authorities who conduct a housing market assessment (305)
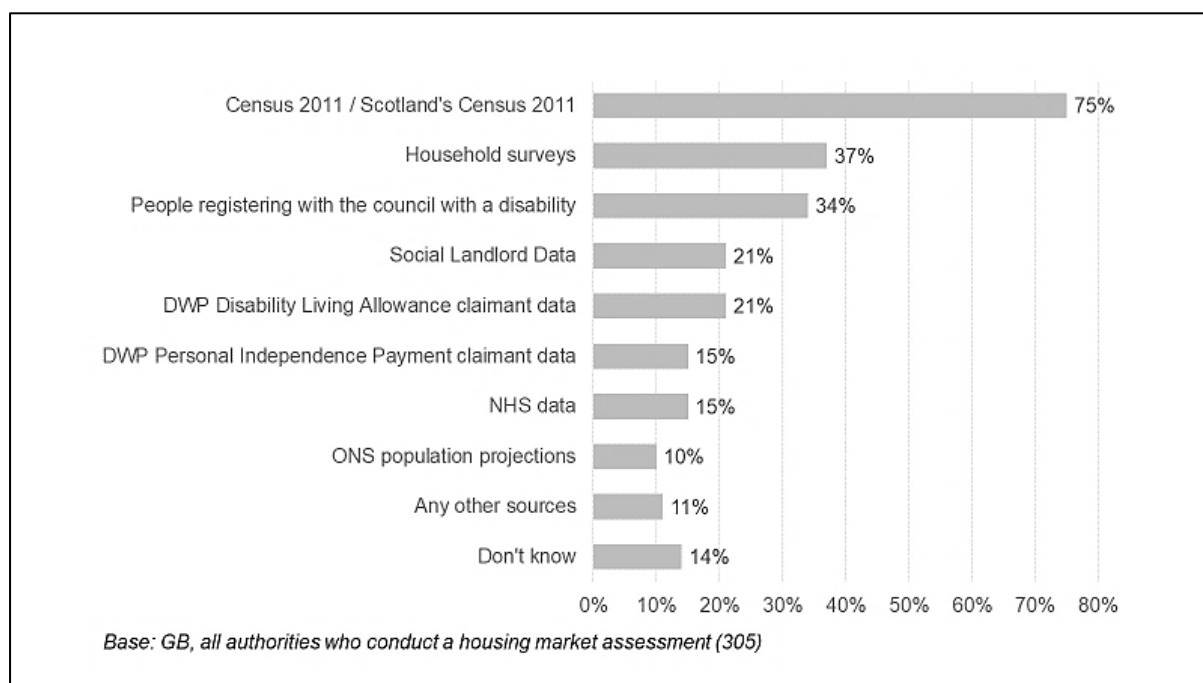
Table 3.2 **Data sources used for housing market assessments, by nation**

	All authorities (%)	Authorities in England (%)	Authorities in Scotland (%)	Authorities in Wales (%)
Census 2011 / Scotland's Census 2011	75	74	90*	63*
Household surveys	37	35	62*	26*
Data on people registering with the council with a disability	22	19*	52*	21
Social landlord data	21	15*	59*	47*
DWP Disability Living Allowance claimant data	21	20	28	21
DWP Personal Independence Payment claimant data	15	14	24*	21
NHS data	15	11*	55*	11

Base: authorities who conduct housing market assessment. GB (305), England (257), Scotland (29), Wales (19)

Perhaps reflecting different regional approaches to housing market assessment across England, authorities in the East of England were more likely to incorporate household surveys (56%) in their assessment than their counterparts in the East

Midlands (23%) and the neighbouring South East region (19%). Authorities in the East of England were also more likely to draw upon DWP Disability Living Allowance claimant data (35%) and DWP Personal Independence Payment data (32%) than those authorities in the East Midlands (14%; 11%) and the North West (12%; 6%). This may reflect regional cooperation in the design of assessments.

3.5   Data availability on disabled people

Local authorities were asked about the general usefulness of the data they possess for making a variety of estimations about disabled peoples' need and demand for accessible and adaptable housing. As shown in Figure 3.2, they were asked to rate the quality of their data on a scale of 'very poor' to 'very good' for seven purposes:

A. The total number of disabled people living in the authority area

B. The number of people with specific disabilities

C. The number of disabled people currently inappropriately housed

D. The number of disabled people currently in residential care who could live independently if appropriate housing were available

E. The number of people in the area likely to require an accessible home in the future.

F. Demand for specific adaptations in the home

G. Future demand for tenancy support from disabled people

Figure 3.2 How would you rate the usefulness of the data you have available for estimating the following…?

	Very poor 1	2	3	4	Very good 5	Don't know
Total number of disabled people living in authority area	4%	12%	36%	26%	5%	18%
Number of people with specific disabilities	10%	25%	28%	13%	4%	20%
Number of disabled people currently inappropriately housed	9%	20%	32%	14%	2%	23%
Number of disabled people currently in residential care who could live independently if appropriate housing available	14%	20%	18%	10%	3%	35%
Number of people in area likely to require an accessible home in the future	8%	18%	32%	17%	3%	22%
Demand for specific adaptations in the home	8%	17%	34%	14%	3%	25%
Future demand for tenancy support from disabled people	10%	23%	26%	9%	1%	32%
Overall usefulness	5%	17%	44%	11%	1%	22%

Base: GB, all authorities providing responses (314)

Local authorities were asked to rate the overall usefulness of the data they held for understanding the current and future needs of disabled people. The local authority responses were generally neutral: 44% felt data availability was neither good nor poor. The data was rated as 'good' or 'very good' for usefulness by 12% of authorities, while more rated it 'poor' or 'very poor' (21%).

Regarding data availability, authorities in Scotland were twice as likely to consider the overall usefulness of their data to be good (24%) compared with the average authority (12%), as shown in Table 3.3. All 15 authorities who felt the data they held was 'very poor' were in England.

Those authorities who didn't own any social housing stock were more likely to rate the usefulness of their data as generally poor when compared with stock-owning authorities (28% of non-stock-owning authorities compared with 18% of stock-owning authorities). This suggests that data sharing with independent social housing providers might not be as strong as with internal council housing departments.

Table 3.3   **Overall usefulness of local authority data, by nation**

	All authorities (%)	Authorities in England (%)	Authorities in Scotland (%)	Authorities in Wales (%)
Very poor 1	5	6	-	-
2	17	17	17	20
3	44	43	45	55
4	11	10	21*	15
Very good 5	1	-	3	-
Don't know	22	24	14*	10*
Total	100	100	100	100

Base: GB (314), England (265), Single tier (103), Lower tier (162), Scotland (29), Wales (20)

- represents a number of less than 0.5%

Authorities were also asked to rate specifically the usefulness of their data for estimating the total number of disabled people living in their area. This figure is particularly important for ascertaining current and prospective demand for services in the local authority. Without robust basic data on the number of resident disabled people, local authorities are sure to find it difficult to determine the appropriate level of provision for any initiative to benefit disabled people, including accessible housing, and to defend the scale of spending on that initiative if challenged. Even if a local survey shows that a certain percentage of disabled people locally require a type of housing, without data on overall numbers of disabled people (that is, population size) to relate this percentage to, such a survey is of limited use.

Responses were more positive than for data availability overall, although they still indicated substantial gaps in knowledge. Roughly three in 10 authorities (31%) felt the data they held was generally good, and 16% felt it was generally poor. Authorities in Scotland were considerably more likely (59%) than authorities in England (27%) to say that the data they held on the total number of disabled people living in the authority area was good.

Additionally, single tier local authorities in England were five times more likely to say the information they held on the number of disabled people was 'very good' (10%), compared with those authorities who operate in a two-tier system (2%). They were also more likely to say the information they held was generally good (34% compared with 22%).

As presented in Table 3.4, authorities that did not own social housing stock were more likely than those stock-owning authorities to say that the data they held on the number of disabled people in their authority was poor (25% and 14% respectively).

Table 3.4 **Usefulness of local authority data for estimating the total number of disabled people living in the local authority, by type of authority**

	All authorities (%)	Authorities who own social housing (%)	Authorities who do not own social housing (%)
Very poor 1	5	1*	8*
2	14	13	16
3	43	45	42
4	32	33	30
Very good 5	6	8	4

Base: GB excluding 'don't know' responses (259), authorities who own social housing excluding 'don't know' (148), authorities who do not own social housing excluding 'don't know' (110)

Estimating the number of people with *specific* impairments using existing data sources appears to be considerably more difficult for local authorities; authorities are more likely to rate the usefulness of their data in this regard as poor. Only 17% of authorities felt the data they held was good for estimating the number of people in the authority with specific impairments compared with 35% who considered their data to be poor.

Concerning the usefulness of data for estimating the number of disabled people currently inappropriately housed, approximately three in 10 (29%) authorities regarded their data as generally poor and only 16% felt their data was good. Authorities in Wales were considerably more likely to state that the data they held on this particular issue was good (40%) compared with authorities in England (14%), and Scotland (17%).

As presented in Table 3.5, larger local authorities were more likely than small authorities (with fewer than 100,000 residents) to say the data they held for estimating the number of disabled people currently inappropriately housed was generally good; the figures were 19% and 8% respectively.

Table 3.5   **Usefulness of local authority data for estimating the number of disabled people currently inappropriately housed, by type of authority**

	All authorities (%)	Authorities with a population of less than 100,000 (%)	Authorities with a population of between 100,000 and 200,000 (%)	Authorities with a population of greater than 200,000 (%)
Very poor 1	9	13	9	4*
2	20	18	22	18
3	32	33	30	36
4	14	8*	17	15
Very good 5	2	-	2	4
Don't know	23	28	20	24

Base: GB (314), Population of less than 100,000 (93), 100,000 to 200,000 (142), 200,000+ (82)
- represents a number of less than 0.5%

Of all the data sources, authorities were least confident in their estimates of the number of disabled people currently in residential care who could live independently if appropriate housing were available. Just over one in ten (13%) rated their data as broadly good in comparison to roughly one-third (34%) of respondents who felt their data was poor.

In England, it tended to be the larger, stock owning, single tier authorities who were more likely to rate highly the usefulness of their data on disabled people and their housing requirements. Looking across the three nations, Scottish authorities were more likely than English or Welsh ones to consider their data useful.

No significant differences were observed between types or locations of local authorities in relation to estimating the number of people in the area likely to require an accessible home in the future. This suggests that most local authorities, regardless of their individual attributes, had a broadly comparable level of understanding in relation to future demand. A similar proportion of authorities agreed that their data was generally good (20%) or generally poor (25%) for this purpose.

3.6   Improving data availability

Given the issues documented above in terms of data availability, those local authorities who had an existing knowledge of their data coverage (266 in total), were

asked to outline further information they would need to better understand the needs of disabled people. Six principal suggestions were identified among local authority responses.

Exactly one-fifth of authorities identified a requirement for better evidence of local disabled people's needs and demands, particularly the number of disabled people within each type of housing tenure (for example owner occupied, private rented sector and so on). This information would enable local authorities to direct resources accordingly.

For about a fifth (18%) of authorities, more specific and detailed information on the specific types of adjustments disabled people required (as opposed to simply knowing they have an impairment or condition of some kind) would help them better understand the housing needs of disabled people. Even in Scotland, where more assistance and data is reported to be available, this was a challenge:

> People living with different disabilities and combinations of disabilities can have very different housing needs and requirements. Making generalisations from data on prevalence of disabilities has been proven in the past to result in poor housing planning… Many people live in the private rented sector and owner-occupied sector and little is known about these tenures… census results give overall figures but tell us little about the actual housing need.
> - Unitary Authority, Scotland

The third most frequently mentioned suggestion identified by local authorities was better engagement, collaboration and cooperation between all stakeholders involved in the delivery of housing for disabled people. This was mentioned by 15% of authorities, highlighting the need for better communication with social services as well as a more transparent approach to data sharing by key stakeholders.

Specifically focusing on large authorities, for those with a population of greater than 200,000, the third most frequently mentioned suggestion was to encourage and fund local gathering of data (15%), compared with smaller authorities (9% of those with a population of less than 100,000 and 6% of those with a population of 100,000 to 200,000).

Three per cent of authorities overall suggested that a national database would be a solution; those with a population of greater than 200,000 people were far more likely to do so (9%). This may be because large authorities have more resource and experience in the use of large databases. Some specific points were made by local authorities in the survey responses, pointing out resource and organisational

constraints, and the difficulty of the task of quantifying disabled people's demand for housing:

> [It would be useful] if data could be collated by a third party on our behalf. Resource issues make it increasingly difficult to conduct robust local research to influence policy.
> - Unitary Authority, South Wales

> We are a two-tier authority. It is challenging to get information on housing need from the County Council.
> - District Council, East Midlands

> Population-based studies are not very useful in planning for the needs of people with significant disabilities. This is because the numbers are small, and people with disabilities still have good reasons for wanting to live in a particular part of the county, just like all other applicants…the only way to do this work properly is detailed analysis of real people known to NHS, social care and education colleagues. This is highly staff-intensive, but, I believe, essential if we are to plan ahead.
> - London Borough

> [We] need further support from the NHS – they have more up-to-date data on status and health of disabled people.
> - Unitary Authority, Scotland

Table 3.6 summarises the suggestions made by local authorities which would help them to better understand the housing needs of disabled people, organised by local authority population. It is worth noting that smaller authorities with fewer than 100,000 residents generally had fewer suggestions of all types; this may reflect their lesser access to resources and expertise.

Table 3.6   What further information would enable the local authority to better understand the housing needs of local disabled people?

	All authorities (%)	Authorities with a population of less than 100,000 (%)	Authorities with a population of between 100,000 and 200,000 (%)	Authorities with a population of greater than 200,000 (%)
Provide better evidence of need / demand	20	15	22	21
More specific / detailed information on the types of adjustments needed	18	14	15	27*
Better engagement / collaboration / cooperation between all organisations	15	12	18	12
More / better access to relevant sources of information e.g. NHS data	9	9	8	9
More flexibility for local areas to set policy	9	9	6	15
A comprehensive central database all parties can use	3	3	1*	9*
Other	9	5	11	9
Don't know / null	32	40	32	22*

Base: All able to answer (266), Population up to 100,000 (78), 100,000 to 200,000 (121), 200,000+ (67)

3.7   Communicating with disabled people about housing

Authorities were asked to indicate the reasonable adjustments they provide to ensure that disabled people can access and understand information about housing matters.

Most authorities (80%) indicated that they provide large print information and 58% use a support worker or advocate to facilitate communication. A similar proportion of authorities have a textphone service for people with a hearing impairment and a screen reader compatible website (39% and 38% respectively). Only 1% of the 310 authorities who responded to this question said that they didn't offer any reasonable adjustments, although a further 9% offered just one. The average authority made 3.1 adjustments from the list, shown in Figure 3.3.

Figure 3.3 **Which of these reasonable adjustments does the authority provide to assist disabled people to communicate with and/or receive information from the authority about housing?**

Base: GB, all authorities not suppressed at this section (310)
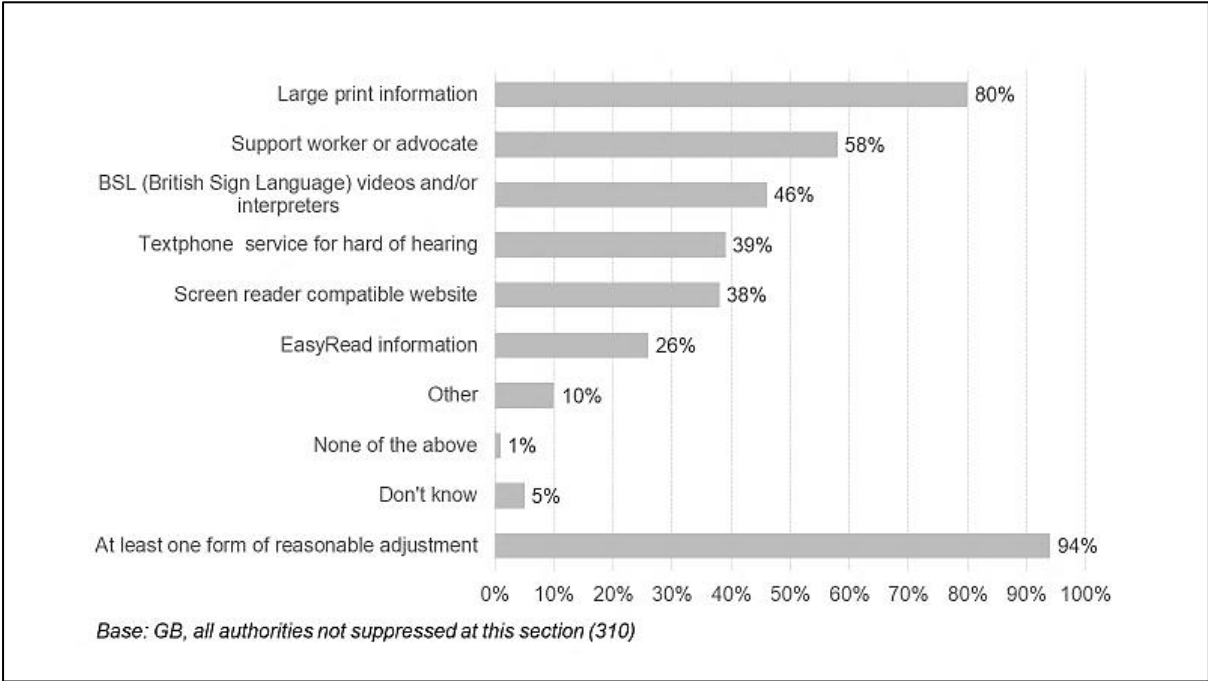
Authorities in Wales were more likely to use a support worker or advocate (80%) than local authorities in England (56%), potentially indicating a greater emphasis on a people-centred approach.

Authorities in the South East of England were more likely to use British Sign Language videos or interpreters than their counterparts in the East of England and the North West, with 56% of authorities in the South East using this compared with 34% in the East of England and 28% in the North West.

As presented in Table 3.7, stock-owning authorities were more likely to say that they offered some form of reasonable adjustment to facilitate communication with disabled people compared with authorities that don't own any housing stock. Almost all stock-owning authorities (97%) selected one of the reasonable adjustments provided compared with 90% of authorities without stock.

By extension, stock owning authorities were more likely to offer a range of reasonable adjustments, across the board. This may relate to their role as a landlord, as their housing departments will need to communicate directly with tenants as well as the general public.

Table 3.7   Reasonable adjustments provided to assist disabled peoples' correspondence with local authorities, by stock-holding status

	All authorities (%)	Stock-owning authorities (%)	Non-stock-owning authorities (%)
Large print information	80	82	78
Support worker or advocate	58	63*	51*
BSL (British Sign Language) videos and/or interpreters	46	53*	36*
Textphone service	39	46*	28*
Screen reader compatible website	38	40	36
At least one form of reasonable adjustment	94	97*	90*

Base: all authorities providing responses. GB (310), Stock-owning authorities (190), Non-stock-owning authorities (119)

3.8   Assessment of housing need

Local authorities were asked to indicate the ways in which they assess the housing needs of disabled people who require an accessible home. The most common methods were working with external occupational therapists; having a contract with an external organisation to provide this service; using in-house assessors; and using information provided in applications for housing.

Authorities often use the advice of external occupational therapists (that is those employed by the NHS or county councils), with 60% of authorities in Britain mentioning this when prompted.

Local authorities in England mentioned that they used external occupational therapists' advice more than the GB average (63%, higher than average, likely due to the county council structure). Around three-fifths (56%) of local authorities in Scotland stated they used this advice, and a third (30%) did so in Wales, lower than the GB average. Just over half (52%) stated they use information provided in applications for housing; this was not significantly different across local authorities in England (54%), Scotland (37%) and Wales (65%). About half (46%) said they have in-house assessors with specific training to deal with applications from disabled people. Local authorities in England were less likely to have these in-house assessors (43%) than in Wales (65%) or Scotland (63%).

Stock-owning authorities were more likely to have in-house assessors with specific training compared with those without council housing – just over half (54%) of stock-owning authorities compared with a third (34%) of authorities who do not own housing stock; this most likely reflects the need of stock-owning authorities for this specialist knowledge in their work as a landlord.

There were also large differences between single tier and lower tier authorities in England in the way they assessed the needs of disabled people who were looking for an accessible home. This reflected the split in county and district responsibilities, as well as the opportunities for economies of scale enjoyed by larger unitary authorities. Single tier (or unitary) authorities were more than three times as likely as lower tier authorities to have in-house specialist assessors who manage applications for accessible homes (75% and 22% respectively). By contrast, lower tier authorities were about two and a half times as likely as single tier authorities to take advice from external occupational therapists (81% compared with 33%); this may be because social care is an upper tier (county council) responsibility.

Similarly, authorities with larger populations – those with more than 100,000 residents – were far more likely to have specialist assessors (78%) than local authorities containing fewer than 100,000 people (22%). London authorities were particularly likely to have their own assessors (92%), reflecting their large population and single tier structure. Nearly two-thirds (62%) of authorities with fewer than 100,000 people said they use information provided in the application, in comparison with just two-fifths (40%) of those authorities where the population exceeds 200,000.

4 |
Matching homes to the people who need them

4.1   Introduction

As explained in Chapter 3, many local authorities no longer own social housing. However, almost all retain a responsibility for its allocation, that is, in the selection of tenants when properties become available. This is done through the operation of a Housing Register and/or Choice Based Lettings scheme, sometimes as part of a wider sub-regional consortium. These allocation schemes typically apply to most social housing in a local authority area, even if it has never been owned by the council.

In some authorities, mainly in Scotland (due to differing national government policies), the local authority does not carry out allocation for providers of social housing other than itself, and each individual social landlord must handle its own allocations. In some cases, this makes little practical difference, because the council is the dominant provider of social housing in any case and will continue to handle the allocation of its own housing; however, if the local authority does not own social housing or is not the dominant provider, residents seeking housing must apply separately to numerous social landlords. In Scotland, the survey indicates that 69%of authorities hold a Common Housing Register to co-ordinate social housing allocations across multiple landlords, and because many of the remainder own council housing, only 7% do not handle allocations at all.

Local authorities and housing providers can set their own criteria for housing provision through an official Allocations Policy. While they are required to give disabled people 'reasonable preference', the relative level of priority given compared with other groups in need may vary. Given that in many areas there are fewer social rented properties available than applicants, even if disabled people are awarded an apparently high level of priority, it is still possible that the local authorities will have given higher priority to other groups. The precise groups that in practice are given

higher priority than disabled people are selected at the discretion of local authorities and may vary substantially. This topic was not covered in the survey, but a typical example would be homeless households with young children.

4.2   Data availability on housing

Local authorities were asked to specify how good or poor their information was on the accessibility of any local accommodation owned by:

- the local authority (where applicable)
- social housing providers
- private rented housing offered to people who apply to the council for housing (where applicable), and
- other market housing, including private rented and owner-occupied housing generally.

Most local authorities that own housing stock rated the information they hold on this housing as very good or good (84%). This was fairly consistent by nation, although local authorities in England were more likely to state that this information was very good (33% compared with 17% in Scotland and 9% in Wales). Just 3% (six local authorities) with council-owned housing stock reported that they did not know what information they had. Large local authorities with more than 200,000 residents were more likely to rate their information as very good or good (91%), compared with those with a population of less than 100,000 (76%).

Almost half (49%) of authorities rated the information they held on social housing owned by other providers as either very good or good, considerably lower than for housing owned by the local authority. This suggests that authorities that do not own housing may have greater difficulty in allocating accessible housing to disabled people or estimating future requirements for that housing. Around a tenth (9%) of local authorities reported that they do not know what information they hold on social housing owned by other providers.

Only just over a quarter (28%) of local authorities who offer private rented housing to those applying to them for housing rated the information they held about these types of properties as very good or good. Sixteen per cent of local authorities reported that they did not know what information they hold on housing of this type.

Local authorities were also asked about data they held on the accessibility of market housing in their area, that is, owner-occupied or rented housing which is *not* used for

allocation to households applying to the local authority for help with housing. Most local authorities either said that the information they held was very poor or poor (36%) on this type of property, or that they did not know what information was held (28%). This could constitute a significant obstacle to constructing new accessible market housing, particularly in England: if the local authority cannot prove a shortfall of accessible housing exists locally, they may find it more difficult to meet the evidential requirements set out in the National Planning Policy Framework (NPPF) for setting a target.

Figure 4.1   How good would you say the information you hold on the accessibility of local accommodation is for…?

Base: All LAs who provide: housing owned by the local authority (190); housing owned by social housing providers (310); private rented housing (282); other market housing (316)
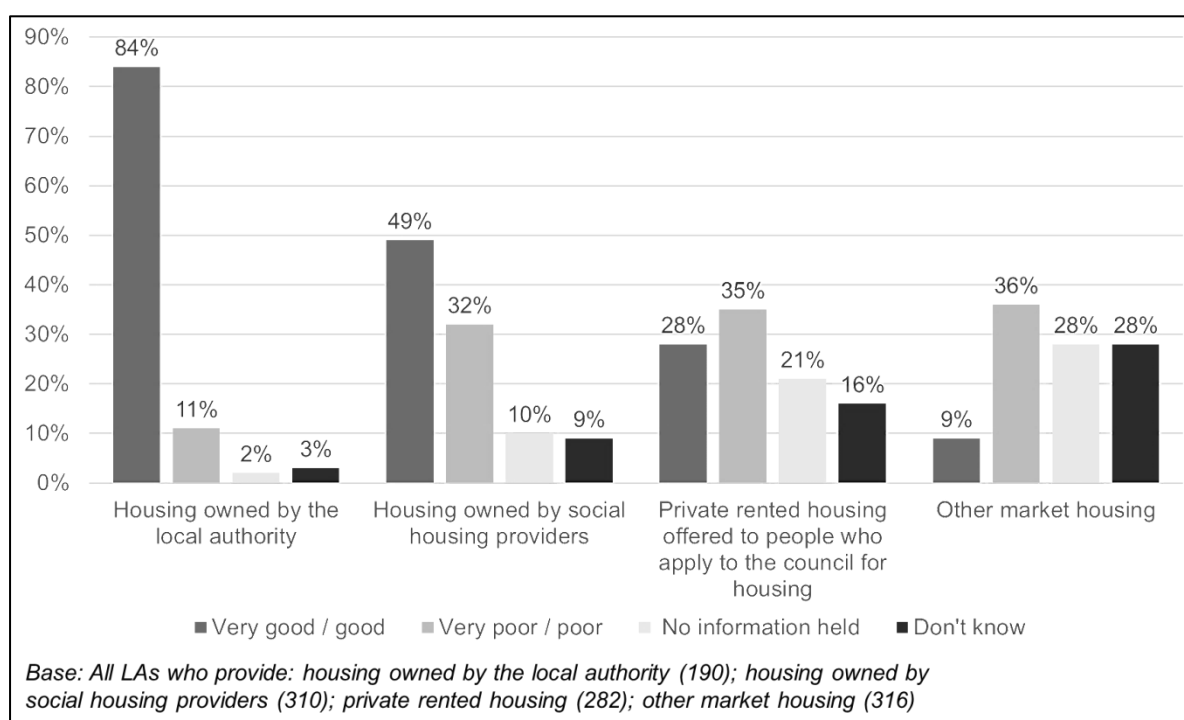
When asked to report on the *detail* of the information that they hold on the properties available, 84% of authorities with council-owned properties reported that they held information on the specific adaptations which had been made to these properties, but only 59% said that they had a detailed knowledge of the detailed level of accessibility of the properties (defined in the questionnaire as a level of information beyond a 'yes' or 'no' classification). This would indicate that while councils are quite good at keeping records of adaptations made, they are less likely to keep records of the impact of those adaptations on the overall suitability of the property for a disabled person to live in. Furthermore, only 30% of local authorities said that the information they held on their own housing included the potential for other currently non-

accessible properties to be converted to accessible homes. However, nearly all (98%) had at least one of these three types of information.

A lower level of detail was held on properties owned by independent social landlords. Half of local authorities (50%) had information on the specific adaptions made to properties of this type, and a quarter (25%) had detailed knowledge of the accessibility of these properties. Only 14% also said the information included detail on non-accessible properties which could be adapted to become accessible. In total 60% held any information on the accessibility of property owned by independent social landlords. A quarter (28%) said they held no information and 12% were unsure if they did.

For other tenures of housing, the level of detailed knowledge was even lower, as shown in Table 4.1, and tended to be focused on adaptations known to be installed.

Table 4.1   Does the information you hold on accessibility for those tenures of housing include…?

	Type of housing tenure:			
	Local authority (%)	Social housing providers (%)	Private rented, used for allocations (%)	Other market housing (%)
Specific adaptations made	84	47	33	13
Potential for other properties to be made accessible	30	14	7	3
Detailed level of accessibility (beyond 'yes / no')	59	23	17	3
None of these	2	28	42	59
Don't know	1	12	17	23

Base: all authorities who hold information on accessibility by housing type. Housing owned by authority: GB (181). Housing owned by social housing provider: GB (251). Private rented housing: GB (178). Other market housing: GB (142).

4.3   Common Housing Register

Most local authorities in Britain oversee the allocation of most of the social housing in their local area, whether or not they themselves own council housing. The survey erroneously assumed this was always the case in England and Wales; in at least one case this was incorrect, although it is not possible to say from the survey results

how many authorities in total in England or Wales do not allocate social housing at all.

In Scotland, it is more common for local authorities not to oversee the allocation of other providers' social housing in their local area (a drive to introduce Common Housing Registers started in 2004[1], but was not completed). Authorities in Scotland were asked whether they operate a Common Housing Register, that is, whether they oversee the allocation for social housing for some (or all) of the Registered Social Landlords in their area. Twenty of the 29 Scottish authorities (69%) reported that they had a Common Housing Register. Seven others (24%) were involved in allocations of housing for their own council housing stock only (which would usually be a clear majority of social housing locally). Only two local authorities (7%) had no involvement in housing allocation at all, although one of these was a major city authority.

4.4   Accessible Housing Registers

All local authorities in England and Wales, and authorities in Scotland with council housing or a Common Housing Register, were asked whether their authority has (or shares with other local authorities) a stand-alone register of accessible and/or adaptable housing which they use in the allocation of housing.

Around one in five (22%) reported that they did have a register of this type (or shared one with other local authorities, see Table 4.2). This was more likely in Wales (52%) where the use of registers is actively encouraged; and in London (42%) where the London Plan requires all homes to be built to accessible standards. Small authorities with a population of less than 100,000 were much less likely to have a register of this type (12%), compared with large authorities with a population of 200,000 or more (35%).

Of those authorities that had a register, most (58%) said that the register was not publicly available, while the remaining 42% reported that the register was public.

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[1] Scottish Government, *Building a Common Housing Register: a practitioner's guide*

Table 4.2   Provision of accessible housing register, by nation

	All authorities (%)	England (%)	Scotland† (%)	Wales (%)
Has accessible housing register	22	19*	26	52*
Has publicly available register	9	8	4*	33*
Has register, but not public	13	11	22*	19*
Has no accessible housing register	74	77*	74	38*
Don't know	4	4	-	10*
Unable to estimate proportion of social and/or affordable housing that is accessible	65	69*	46*	50*

Base: all authorities involved in allocation of housing (314). England (266), Scotland† (27), Wales (21)

† excludes authorities not involved in the allocation of housing

- represents a number of less than 0.5%

Clearly, most local authorities in Britain lack an accessible housing register. However, 62% of local authorities managing housing allocations reported that their systems provided detailed information on the suitability of properties for different impairments; this rose to 71% in Wales where accessible housing registers are more common.

On average, local authorities reported that 14% of the social or affordable rented housing (both council-owned and PRP or RSL owned housing) in their area is believed to be accessible based on their register. However only a small proportion held information (30%), rising to about half in Scotland, Wales and London (52%, 48% and 46% respectively). It is worth noting that even though small authorities (with less than 100,000 population) performed in line with the average, only 22% of lower tier district authorities in England had information available. There is also a strong connection with providing tenancy support services; only 15% of authorities that do not provide tenancy support services to residents are aware of the proportion of accessible housing in their social or affordable rented stock.

4.5 Success in matching properties to people with specific impairments

Around nine in 10 (89%) local authorities managing housing allocations reported that they were either very or quite successful in matching suitable properties to disabled people with specific impairments. This might be argued to be a surprising result given that many local authorities had little data to work with to achieve this. It might be that staff's informal knowledge of the accessibility of specific social housing developments could play a role in smaller local authorities.

Those local authorities with council-owned properties were more likely to rate themselves as very or quite successful in matching suitable properties (94%), compared with authorities without this housing type (83%).

Large local authorities with more than 200,000 residents were more likely to rate their ability to match applicants to suitable properties as very successful (41%), compared with those with a population of between 100,000 and 200,000 (25%) and less than 100,000 residents (20%). There were no significant differences by nation in the proportion of local authorities who rated themselves as either very or quite successful in matching suitable properties to disabled people with specific impairments.

4.6 Waiting times

Local authorities who said that they held information on the accessibility of their housing provision were asked to report the average length of time (in calendar months) that applicants requiring accessible housing spent on the housing register, as of 31 December 2016.

Only around four in 10 (42%) were able to provide an answer; this reflects the diversity of systems used to allocate social housing, many of which are no longer based upon waiting lists and therefore might not record waiting times. In addition, systems might or might not be able to separate out waiting times for those requiring accessible housing from other applicants. Local authorities with housing that was not owned by the council were less likely to provide an answer to this question (32%), compared with authorities with council-owned housing (48%).

Of those who were able to report on waiting times, the average length of time that applicants for accessible homes spent on the housing register was 25 months,

compared with 27 months for those applying generally. Although this would seem to suggest that disabled applicants have a very slightly shorter wait, not too much should be read into this small difference because it is not known if people leaving the register at this time were provided with a property. In other words, a longer wait might reflect deprioritisation, or it might counter-intuitively reflect prioritisation, since many local authorities periodically 'clean' waiting lists (that is, remove those unlikely ever to receive a home, leaving only high priority cases).

4.7   Policy on accessible homes

Local authorities who said they held any information on local accommodation were asked what they would do if they were unable to provide an accessible or adapted home to an applicant where it had been accepted there was need for one. Most authorities reported that they would explore options with the applicant to help them adapt their current home (93%). A smaller proportion (81%) said they would explore options to adapt an available home for the applicant that was not currently accessible.

Around two-thirds of authorities (67%) reported that they would suggest to the applicant that they carry on waiting for now (depending on anticipated length of wait). Exactly six in ten said that they would explore the option for the applicant to go into residential care or another type of accessible housing scheme. Just over half (55%) of local authorities reported that they would explore accessible housing options in the private sector.

Figure 4.2 Reaction to being unable to provide a suitably accessible or adapted home to a disabled applicant for housing

Explore options to adapt their current home — 93%
Explore options to adapt an available but non-accessible property — 81%
Suggest they carry on waiting for now (dependent on anticipated wait length) — 67%
Explore options for the tenant to go into residential care / accessible housing scheme — 60%
Explore options in the private sector — 55%
Look for alternative housing options (unspecified) — 6%
Explore new build programmes / properties — 5%
Buy an existing property — 2%
Depends on the outcome of the assessment — 2%

■ % Local authorities who said they would carry out each action

Base: All local authorities who hold any information on local accommodation (310)

Local authorities that provide direct tenancy support were more likely to explore options to adapt the applicant's current home (96%), compared with authorities that do not provide any tenancy support at all (89%).

Small local authorities with a local population less than 100,000 were more likely to report that they would explore housing options in the private sector (67%), compared with authorities with a population between 100,000 and 200,000 (53%) or over 200,000 (46%).

4.8   Self-assessment: effectiveness of local authorities in assessing the housing needs of disabled people

Those authorities who said they held any information on local accommodation were asked to report how effective their organisation was in assessing the housing needs of disabled people who required an accessible home. Most (94%) responded that they were either very or quite effective in their assessments, indicating a high level of confidence in this area. This does not necessarily mean they have a high level of satisfaction with the outcome, just that they are satisfied with their own performance in the wider context of the constraints on their work.

Local authorities with a population greater than 200,000 were more likely to report that they were *very effective* in assessing the needs of people who need an accessible home (54%), compared with authorities with a population between 100,000 and 200,000 (35%) and less than 100,000 (29%).

5 |
Building new accessible homes

5.1 Background: planning policy

As detailed in Chapter 4, local authorities are responsible for ensuring that new housing delivery in their area is broadly in line with the area's needs, including the needs of disabled people, and are expected to assess this using housing market assessments as an evidence base to back up their requirements.

Local authorities can use this assessment as backing for planning policy, giving them the ability to veto developments that do not, for example, meet a certain percentage target for accessible or adaptable housing (in excess of the mandatory minimum level of accessibility set down in Building Regulations or Building Standards, which must be achieved by all new dwellings).

The mandatory minimum varies across Britain and is laid down in rules set by national or devolved government. In England and Wales, Part M of the Building Regulations lays out a mandatory standard for accessibility of housing (called M4(1) in England), referred to as 'visitable' housing. This requires that the building is accessible by a disabled person capable of walking; it would not usually be described as 'accessible' housing. However, the mandatory standard laid down in Sections 4.1 and 4.2 of the Building Standards in Scotland is much higher, for example requiring wheelchair access to the ground floor of all new housing.

Where a local authority wants to require developers to build housing which is more accessible than the mandatory minimum, this must be done by incorporating their housing market assessment's findings into a local planning document (as detailed in the Glossary). The survey contained a number of questions for local authorities exploring the extent to which they are able to shepherd requirements for accessible or adaptable housing through this process.

Once this is done, local authorities can require developers to supply accessible housing in line with their target, subject to an assessment of viability. They may, however, choose instead to negotiate site-by-site with no fixed target.

In England, although blanket targets may still be set, since 2012 site-by-site negotiation must be entered into regarding percentage targets if the developer wishes to do so, under the National Planning Policy Framework (NPPF). In addition, local authorities in England (unlike in Wales or Scotland) cannot use any accessible housing standard they choose; they must use the specific standards laid out by national government in the M4(2) and M4(3) optional Building Regulations.

In Scotland and Wales, no such restrictions exist, and most respondents were unsure what specific additional standards they used. One Scottish authority mentioned using Housing for Varying Needs, Part 1, as required for all Scottish social housing, and which is mentioned in Scottish Building Standards as a suggested higher standard to consider. One Welsh authority mentioned using Lifetime Homes which, similarly, is a requirement for social housing in Wales, but not specifically endorsed for the purpose of planning negotiations.

It should be noted that there is nothing in any nation of Britain to prevent a developer providing *more* accessible or adaptable housing than is required by planning rules. Where the developer is a Registered Provider of social housing (or Registered Social Landlord), rules laid down by their national regulators (see Glossary) may require them to provide more, as explored later in this chapter.

5.2   Compliance with duties

Public Sector Equality Duty (Equality Act 2010)

When compiling their Local Plan, Local Development Plan and/or Local Housing Strategy, local authorities have a duty under Section 149 of the Equality Act 2010 (Public Sector Equality Duty or PSED) to have due regard to the need to eliminate discrimination and advance equality of opportunity.

In the survey, authorities were asked how they discharge this duty in respect of formulating and monitoring the housing assessment element of the Local Plan (or Local Development Plan in Scotland).

Most local authorities (64%) said that they conduct an Equality Impact Assessment on the Local Plan generally. Scottish authorities were less likely to do this (41%); however, they were instead more likely to say that they discuss and scrutinise disabled peoples' housing needs when formulating the Housing Needs and Demand Assessment (Scotland) specifically (45%). Only 14% of English and Welsh

authorities relied on this Strategic Housing Market Assessment (England) / Local Housing Market Assessment (Wales).

Examination in Public (EiP)

Six in ten authorities have had their Strategic Housing Market Assessment (England) / Housing Needs and Demand Assessment (Scotland) / Local Housing Market Assessment (Wales) examined by Inspectors appointed by the Secretary of State or devolved government, either directly or as part of a wider examination of a Local Plan or Local Development Plan. This proportion was higher in Wales (95%) and Scotland (79%) than in England (55%). Of those whose housing market assessment had been examined, 70% have had their housing market assessment and Local Plan approved, and 27% were under examination at the time of the survey, although only 3% had failed to have either their housing market assessment or Local Plan approved.

In Scotland, the accessible housing target is typically included in the Local Development Plan (61% said their plan included a target) and is examined (if necessary) as part of that process. If it is not expressly included within the Local Development Plan, then it will be included as part of the Local Housing Strategy (and, indeed, will be included in the Local Housing Strategy in any event as a result of information provided via the Housing Needs and Demand Assessment); however, the figures must be consistent with the Local Development Plan.

The process of assessment of the Local Housing Strategy was not asked about in the survey, and therefore figures for Scotland are dealt with separately from England and Wales, dealing only with the 61% of authorities who reported that their Local Development Plan did include an accessible housing target.

In England, the National Planning Policy Framework (paragraph 159) requires that local authorities carry out a Strategic Housing Market Assessment (SHMA) and a Strategic Housing Land Availability Assessment (SHLAA), both of which constitute Development Plan Documents forming part of the Local Plan for an area and are, therefore, examined during the Local Plan process.

In Wales, Welsh planning policy requires that a Local Market Housing Assessment (LMHA) is carried out, which constitutes part of the statutory Development Plan and, again, is subject to examination through the Local Plan process and informs the Local Housing Strategy.

Of those authorities in England and Wales who had their examination completed, most did not attempt to include an accessible housing requirement in the Plan (55%)

(see Table 5.1), a situation which would be expected to make it difficult to require this type of housing from developers. Of those who did, 71% had their Plan approved with no changes; only 13% had an amendment made. However, it is notable that when this occurred, it was generally to reduce the amount of accessible or adaptable housing required (12%). Given that local authorities are required to evidence accessible housing requirements with robust data, this finding may indicate the difficulty of this task.

Table 5.1 **Outcomes of Local Development Plan evaluation, overall and by nation**

Outcome	Overall (%)	England (%)	Wales (%)
An amendment to require more accessible and/or adaptable housing	1	1	0
An amendment to require less accessible and/or adaptable housing	5	6	0
Approval without changes of the amount of accessible and/or adaptable housing required	32	34	19
Neither - the Housing Market Assessment / Local Development Plan did not include a requirement for a specific quantity of accessible and/or adaptable housing	55	51*	81*
Don't know	7	8	0*

Base: All authorities in England and Wales who had their evaluation completed (115), England (99), Wales (16)

5.3   **Planning Policies**

As shown in Table 5.2, only around a quarter of authorities (28%) said that they set a target percentage for the proportion of housing built by developers on most or all developments to be accessible and/or adaptable, in excess of mandatory requirements laid down in Building Regulations or Building Standards. This type of policy was less common in Wales (5%), though more common among authorities with a population greater than 200,000 (41%) and much more common in London (84%).

As noted in the introduction to this chapter, mandatory accessibility standards in Scotland are far higher, and so when a local authority in Scotland requires housing to be more accessible than the mandatory minimum they are starting from a higher base. This is likely to explain why a higher proportion (34%) make no attempt to

require accessible housing from developers than in England (12%). However, in Wales the mandatory minimum is effectively the same as in England, yet still a third (30%) make no attempt to push developers to construct accessible housing.

It is important to mention that building regulations and planning policy are not the only methods of enforcing the delivery of accessible housing in Britain. In particular, national or devolved authorities can make requirements of social landlords as a condition of receiving subsidy for their housing – this is used in Wales (Lifetime Homes) and Scotland (Housing for Varying Needs, Part 1) to enforce higher standards on all new building by social landlords without any involvement from local authorities or the planning system.

Table 5.2   Prevalence of different planning policies to encourage construction of accessible or adaptable housing, overall and by nation

Policy	Overall (%)	England (%)	Scotland (%)	Wales (%)
Set a target percentage of housing built by developers on most or all developments to be accessible and/or adaptable	28	31*	17*	5*
Negotiate with developers on a site-by-site basis for the delivery of accessible and/or adaptable housing	49	51	28*	55
Encourage developers to deliver accessible and/or adaptable housing in any other way	30	31	17*	25
None of the above	16	12*	34*	30*
Don't know	8	8	10	0*

Base: All authorities providing data (314), England (265), Scotland (29), Wales (20)

Of those authorities across England, Scotland and Wales who set a target percentage for accessible and/or adaptable housing, the average proportion required was half (50%, or 11% including those authorities with a no target as zero). The distribution was polarised within this, however. This distribution is shown in Figure 5.1.

For wheelchair accessible dwellings, the average requirement within this was much lower, at 5%. It is possible to break down the 50% average requirement into standard accessible housing and wheelchair accessible housing. Average targets were 45% for standard accessible housing, and 5% for wheelchair accessible housing (less than 2% if including those authorities with no target as zero).

Figure 5.1   **Percentage of new homes that need to be accessible, according to mandatory planning requirements**

Requirements for accessible
and/or adaptable housing

- No target
- 1-10%
- 11-20%
- 21-50%
- 51-75%
- 76-99%
- 100%
- Don't know

18%

7%

1%

3%

4%

3%

65%

(mean = 44%, among those with a target)
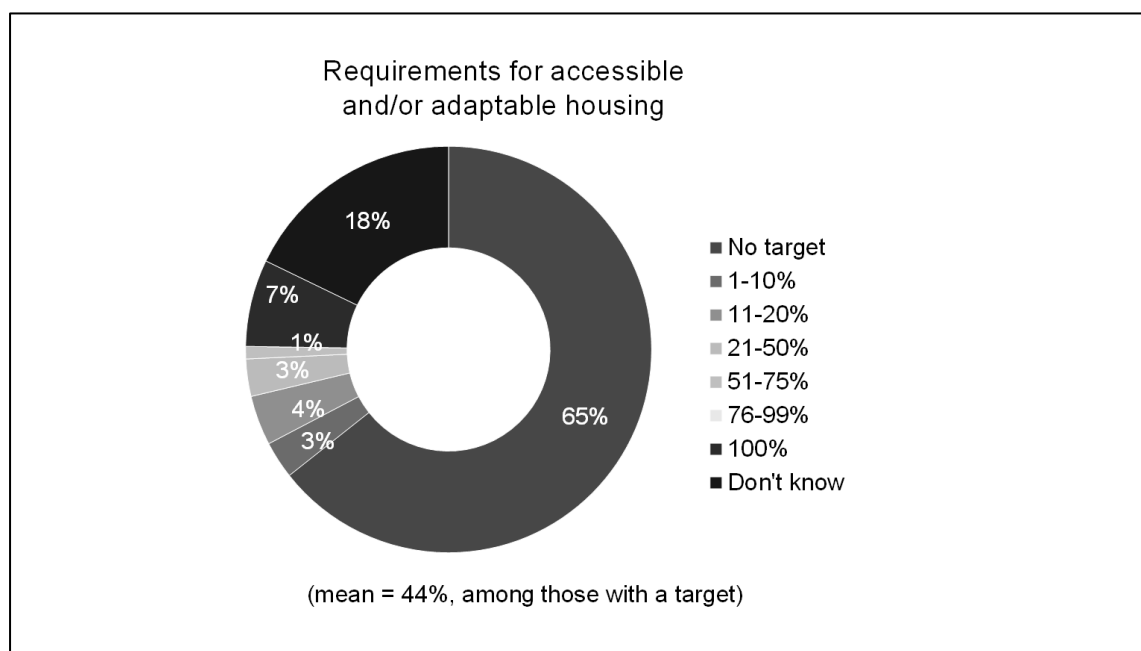
Base: All GB authorities providing responses (314)

As can be seen in Figure 5.1, a small number of authorities (7%) required 100% accessible housing; a selection of these cases was examined in detail and found to be genuine. They relate mainly (but not exclusively) to local authorities in London, where the average target (including those with a zero target) was 66%, far above the national average of 11%. The requirement for 100% accessible housing to at least Optional Building Regulation M4(2) derives from the London Plan (published by the GLA), although the survey does indicate that this is not complied with by every London authority; four London authorities said their target was 10%, and three said did they not require any accessible housing of developers.

Authorities in Scotland (34%) and Wales (30%) were more likely than authorities in England (12%) to say they had none of the types of planning policies described above in place. In Wales, this may be mitigated somewhat by the requirement for 100% Lifetime Homes in accordance with the Welsh Housing Quality Standard and Development Quality Requirement. In Scotland, this may be mitigated somewhat by the greater emphasis on provision via Building Standards. Whilst not being as exacting as some accessible homes standards (the default standard has 14 accessible features, so is nearly equivalent to M4(2)), Building Standards in Scotland (the Scottish equivalent of Building Regulations) require a mandatory level of accessibility far in excess of the English and Welsh standards, and can, therefore, be

used as a vehicle for requiring a proportion of properties (but not all) to meet a certain accessibility standard.

5.4   Ensuring standards of accessible and/or adaptable housing

Although more than a quarter of authorities set a target for the proportion of new homes to be accessible and/or adaptable, the evidence suggests that this target is rarely monitored. Among the local authorities who set a target, two-thirds said they did not know what percentage of this target is actually delivered as a proportion of all new housing constructed. This means that only a small proportion of authorities (6%) had a monitored target for accessible housing provision.

Of the 6% of authorities that were able to provide a figure for the proportion of accessible and/or adaptable homes ultimately built, the average (mean) percentage built was 18%. Although this appears to compare unfavourably with the overall average requirement for accessible housing (44%), it is closely in line with the average proportion that this same group (local authorities who were able to monitor delivery) had required originally (18%).

In England, less than one in five authorities (17%) said that there was a difference between affordable tenures and market housing with regard to the proportion of new homes required to be accessible and/or adaptable. In Scotland and Wales, however, it was more common for there to be a difference, with half of authorities (48% in Scotland, 50% in Wales) reporting a difference between required percentages.

In Wales, 100% of new affordable housing (as a condition of subsidy from the Welsh Government) is required to meet Lifetime Homes standards. The fact that not every local authority in Wales mentioned a target of 100% in the social housing sector is most likely because it is not a requirement they set.

Similarly, in Scotland, houses built under the Affordable Housing Supply Programme (AHSP) are required to meet the Housing of Varying Needs, Part 1 wheelchair accessibility standard. As in Wales, local authorities in Scotland did not always mention this, most likely because it is not a requirement set by them.

In general, as shown in Table 5.3, these sector differences resulted in a slightly higher overall requirement for affordable housing compared to housing in general, although not by a substantial amount. There was no appreciable difference found between targets set for housing built by or for the authority themselves, and housing built for an independent social landlord, nor by sub-type of affordable housing.

Table 5.3 **Percentage of new homes that need to be accessible and/or adaptable to a standard in excess of mandatory planning requirements in specific tenure types, by percentage requirement**

Percentage requirement (%)	Affordable housing for rent, from LA (%)	Affordable housing for sale / part sale, from LA (%)	Affordable housing for rent, from RP/RSL (%)	Affordable housing for sale or part sale, from RP/RSL (%)
0	47	52	46	51
1 to 9	1	1	2	1
10 to 24	8	5	7	5
25 to 49	3	2	3	3
50 to 99	1	1	1	1
100	9	8	10	8
Don't know	31	31	32	32

Base: All authorities providing data (314)

5.5 Compliance with requirements for accessible / adaptable housing

Of those authorities who impose on developers some proportional requirements for accessible and/or adaptable housing, 67% secure compliance through pre-application discussions, ensuring that the requirements form part of the approved planning application. In England and Wales, 49% of authorities use Section 106 planning obligations (as detailed in the Glossary) and 30% use Building Regulation certifications.

In Scotland, only 15% of authorities use Section 75 agreements (equivalent in function to Section 106, as detailed in the Glossary) to ensure compliance. Scottish authorities were also less likely to impose conditions on planning permission (15%, versus 49% in England and 55% in Wales). This may relate to the higher mandatory minimum laid down in national Building Standards in Scotland; two-thirds (62%) mentioned using these to enforce compliance.

5.6   Housing developers and accessible and/or adaptable homes

Authorities were asked to rate their level of agreement with six statements relating to their experience of working with developers in their area to deliver accessible and/or adaptable homes. These statements were:

A. Developers tend to find ways around regulations and standards on building accessible homes.

B. Developers are normally fully compliant, and don't seem to have any problems meeting building regulations on accessibility.

C. When it comes to building accessible homes, we try not to impose a lot of regulation on developers, because we don't want to discourage new development.

D. It can be difficult to get developers to build accessible homes because they see them as more expensive and less profitable.

E. Developers face too much red tape when it comes to building accessible homes.

F. There is a pressure to maximise land use through density and design.

Levels of agreement with these statements are shown in Figure 5.2. One in four authorities agreed or strongly agreed that developers tend to find ways around regulations and standards on building accessible homes with a similar proportion (26%) disagreeing or strongly disagreeing. This perception was less common in Scotland, with only 7% of Scottish authorities agreeing with this statement and 38% disagreeing.

Figure 5.2 **Agreement with statements relating to authorities' experience of working with developers to deliver accessible/adaptable homes**

	Strongly disagree	Disagree	Neither/nor	Agree	Strongly Agree	Don't Know
Developers tend to to find ways around regulations and standards to building accessible homes	4%	23%	30%	18%	7%	18%
Developers are normally fully compliant, and don't seem to have any problems meeting building regulations on accessibility	4%	18%	27%	26%	6%	20%
We try not to impose a lot of regulation on developers when it comes to building accessible homes because we don't want to discourage development	11%	21%	30%	22%	3%	13%
It can be difficult to get developers to build accessible homes because they see them as more expensive and less profitable	3%	11%	14%	41%	16%	15%
Developers face too much red tape when it comes to building accessible homes	9%	34%	32%	4%	1%	20%
There is a pressure to maximise land use through density and design	8%	16%	40%	22%		13%

Base: All GB authorities providing responses (314)

Thirty-two per cent of authorities agreed that developers are normally fully compliant with accessibility regulations, though 21% disagreed; 27% said that they neither agreed nor disagreed, and 20% said they did not know. Compliance was seen as much less common in England (28% agreed) than in Scotland (59%) and Wales (55%). Despite the low level of agreement that developers are normally compliant with accessibility regulations, only seven authorities (3%) had taken either formal or informal action against a developer who did not deliver the required number of accessible and/or adaptable properties to the standard required in the last three years. It is not clear from the research why local authorities have not taken action in more cases, and it should not be assumed that (although possible) this is out of choice; for example, it could be due to a lack of resources to enforce compliance, or to the nature of the regulations or enforcement powers available.

Fifty-six per cent of authorities with accessibility or adaptability requirements for developers said that they have an officer or officers charged with monitoring compliance with these requirements, and this was more likely among authorities with a population greater than 100,000 (59%).

A quarter of authorities said that they try not to impose a lot of regulation on developers, to avoid discouraging development of new homes. However, this attitude varied between regions. Some regions were more likely than others to comprise

local authorities that preferred not to impose regulations on developers (North West: 50%, South West: 42%) while in other regions this attitude was less prevalent (London: 8%, East of England: 9%, South East: 14%). One respondent commented:

> A lack of a robust policy to require delivery of such homes [is an obstacle]. The prevailing view of councillors was that setting a target in policy would be too onerous on developers, hence, site-by-site discussions.
>
> - District Council, South East England

Most authorities across Britain (57%) agreed that it can be difficult to get developers to build accessible homes because they see them as more expensive and less profitable, though this attitude was less prevalent in London (28%). The issue was highlighted by two respondents as follows:

> Developers have greater preference to build general mainstream housing which meets basic building regulations. Building accessible/adaptable housing can be seen as an additional expense with no additional gains for the developer.
>
> - Unitary Authority, Scotland
>
> Developers will only build accessible market homes to a higher standard [than] building regulations if they believe they can sell them at a price that considers the larger footprint and therefore the reduced density.
>
> - Unitary Authority, West Wales

Only one in twenty authorities agreed that developers face too much red tape when it comes to building accessible homes. Most authorities (62%) agreed that there is a pressure to maximise land use through density and design and this attitude was especially prevalent in London (84%), as might be expected given the very high cost of land there.

When asked to describe the single biggest challenge authorities faced when trying to get developers to build more accessible homes, the issue of developers' finances came up very frequently. Independent site viability assessments (see Glossary), typically used in negotiations between developers and local authorities, frequently resulted in reductions in the proportion of accessible housing required. Viability was seen as a problem specific to their local area by many authorities, but in practice the argument applied in almost all areas, either justified by reference to low property sale prices or high land values:

[It is difficult to] evidence the specific need for such accommodation along with [demonstrating] the viability of providing such accommodation.

- District Council, South West

In London, a higher proportion of authorities (16%, compared with 4% across England, Scotland and Wales) said that they faced no challenges in getting developers to deliver accessible homes. This is particularly interesting in the light of the much higher targets for accessible home construction set in London via the GLA London Plan, although this may relate to higher land values.

Many local authorities saw this partly as a matter of national policy. They felt they were not supported in making demands of developers, either through the NPPF in England, general government requirements, or the Building Regulations or Standards.

There is a lack of strong national planning policy requirement in NPPF to underpin planning decisions and local plan policy.

- Unitary Authority, Yorkshire and the Humber

[The] requirement for both a robust evidence base and [policy approved through an Examination in Public] [is] too high a bar.

- District Council, South West

Accessibility of new homes is now governed by the Building Regulations regime rather than planning. This is a less flexible approach and homes either comply with M4(2) or they do not. Planning authorities do not [sic] have the power to require homes to comply with most of the standards in M4(2) but not all. It's all or nothing. As such, if a second floor flat in a two-storey building is not wheelchair accessible – because there is no elevator, for example, then the flat need only be M4(1).

- London Borough

Around one in four authorities (27%) spontaneously mentioned issues related to viability assessments or cost of building accessible homes while one in six (16%) suggested that developers generally prioritise profit over social good.

Viability and site restraints may be challenges that affect developers' ability / desire to deliver more accessible homes. However, the main challenge is creating a stronger business case / requirement for developers to deliver more accessible homes and the ability to shape this.

- Metropolitan Borough, North West

Finally, a number of authorities mentioned bureaucratic delays. It was reported that a change in national government policy could result in an existing policy enforcing accessible housing being rendered invalid, at which point a defensible replacement could take months or years to put in place. Many authorities mentioned that they were awaiting approval of a Local Plan which should improve the situation.

> In addition, we need to have robust planning policies in place to ensure accessibility standards are met, the Government can also remove or change the name of standards which our polices refer to, for example the Code for Sustainable Homes, which is unhelpful.

- District Council, East Midlands

6 |
Helping disabled people to live independently in their existing home

6.1   Grants for adaptations

Background

All authorities have some role in providing adaptations to disabled people who require them whatever tenure of housing they reside in. People can apply to the council for adaptations to be made to their owned or rented property. In England and Wales this is done through the Disabled Facilities Grant (DFG), and in Scotland the process is covered by the Housing (Scotland) Act 2006 (Scheme of Assistance) Regulations 2008. In Scotland, the responsibility for provision is shared with local NHS boards, via Integrated Joint Boards (IJBs).

Local authorities have some discretion over the approval or refusal of applications, although some criteria laid down centrally are quite specific. Applications in England and Wales can be refused for being 'not reasonable and/or practicable to fit' or 'not necessary' or 'not appropriate' to the individual's needs. These terms are open to interpretation and waiting times may also vary.

A number of other schemes for additional or other home adaptations or equipment are mandated by national governments or run voluntarily by groups of local authorities. These are not covered in detail by this research.

Application volumes

The average authority in Britain received 194 applications in 2015/16 to provide adaptations to homes. The trend in the number of applications has been broadly flat since 2013/14, with about 200 per authority in each year.

As shown in Table 6.1, the number of applications per authority, as might be expected, varied broadly in line with authority population.

Table 6.1 **Applications for grants, by nation and per 1,000 residents**

	Number of applications	Applications per 1,000 residents
England	184	1.1
Scotland	209	1.9
Wales	286	1.9
Average	194	1.3

Base: all authorities. GB (317), England (267), Single tier (105), Lower tier (162), Scotland (29), Wales (21)

Approval rates

In England, on average, local authorities approved exactly three-quarters of applications for DFGs, rising to nine in ten in Wales. Generally, applications are either accepted or rejected; few local authorities say any applications result in partial funding in either England (3%) or Wales (5%).

Outright rejection of applications is mainly confined to England where, at the average local authority, 4% are rejected, compared with less than 1% in Wales. Local authorities said that applications were more likely to be withdrawn by the applicant (10% in England, 6% in Wales). On average, local authorities in England said that 3% of applications remained under consideration (less than 1% in Wales), but on average did not state the outcome of 5% of applications (3% in Wales). It may be that in some cases a backlog of applications, or a need to correct errors made on forms (frequently referred to in local authorities' comments) meant that applications had been received but were not yet being considered.

These figures paint a picture of a generally high level of acceptance of grants, but they do conceal the fact that there is a small number of local authorities that behave differently. In England, 6% of authorities reject more than a quarter of all applications made for adaptations, and 16% cover the full cost in response to less than half of all applications. Other than being located in England, there was no clear characteristic separating this group of authorities from the others.

In Scotland, the system is different and is based on rules set by the Scottish Government – most adaptations are not fully funded, requiring a user contribution of 20%. A third (36%) of applicants were awarded mandatory grant at 100% of the cost, and two-fifths (59%) awarded mandatory grant at 80% of the value of the adaptation. Outright refusal is rare (1%) and a larger proportion of applications (7%) are withdrawn by the applicant.

Consultation

In deciding whether or not to accept an application for an adaptation, most local authorities consulted the applicant (86%), an advocate for them (74%), family members or carers (72%) and, less commonly, healthcare professionals (57%) (Figure 6.1). In general, local authorities were more likely to consult individuals and their immediate representatives than professionals and organisations.

There was no clear variation by nation, but authorities with more than 200,000 residents were more likely to consult widely, including with healthcare professionals (70%), social care professionals (50%) and national disability organisations (32%).

Figure 6.1   Those consulted by local authorities when deciding on an application for an adaptation

Base: GB, all authorities (317)
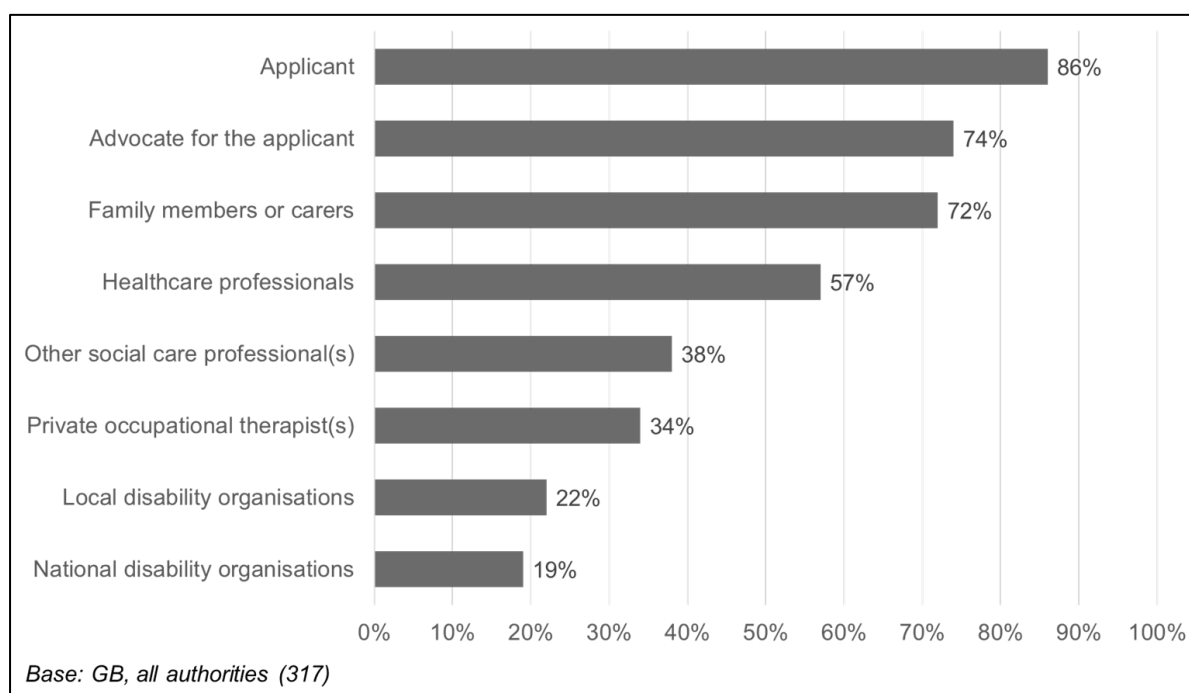
Reasons for refusals

As shown in Figure 6.2, the leading reason for refusing an adaptation in England and Wales was the failure of the means test. That applications are commonly rejected on these grounds suggests that applicants are either unaware of the test or find it difficult to tell if they are likely to qualify.

It is worth noting that very few local authorities in Scotland who responded to the survey said they ever refused applications (8 in total). Therefore, the reasons shown in Figure 6.2 do not apply to Scotland, figures shown are for England and Wales only.

The reasons given for the refusals in Scotland were:

- Not reasonable and/or practicable to fit the adaptation to the property (4 local authorities)
- Applicant did not pass means test for non-mandatory grant (1 local authority)
- Cost prohibitive (1 local authority)
- Not considered appropriate to the individual's needs (possibly based on advice from social services) (1 local authority)

Figure 6.2 Reasons given by local authorities for refusing an application for an adaptation

Base: England and Wales, all refusing any applications (103)
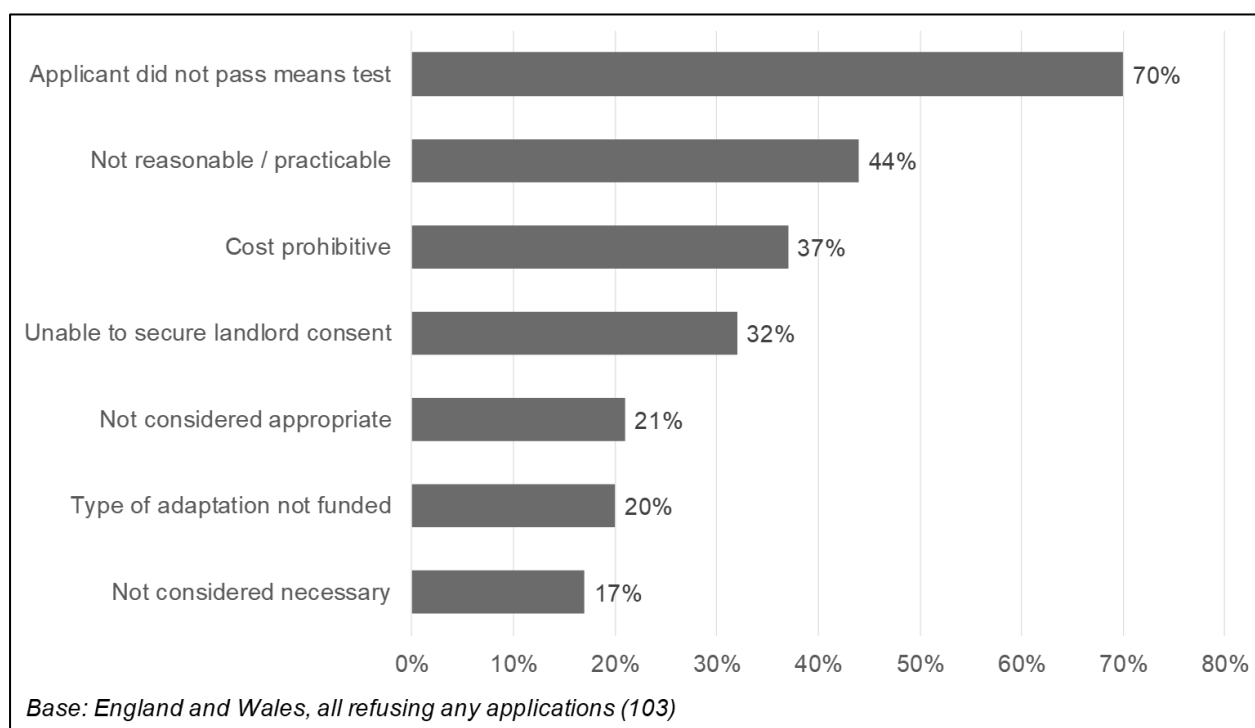
Installation time

As well as asking local authorities what proportion of applications was approved, the survey also asked the timeframe within which the applications were approved and then the adaptations actually installed. Obviously, both issues have a major impact on the people whose lives are affected by these decisions. The first element of this is waiting time for the decision on the outcome of an application.

A few (13%) local authorities who provided adaptations did not have information on application waiting times readily available, rising further among small authorities with a population of less than 100,000 (17%). Of those with data available, 46% said that they typically delivered a decision within four weeks; the average was eight weeks.

As with refusal rates, however, a few authorities (4%) performed less well, taking more than six months to approve a typical application. These authorities were almost exclusively found in England, but otherwise did not fit any specific profile.

Once approved, the adaptation must be installed, a process usually organised via the local authority. This took an average of fourteen weeks, although there was substantial variation. Scottish local authorities performed particularly well here; 41% typically delivered adaptations within eight weeks of a decision, compared with just 21% in England and Wales. Again, although most authorities in England and Wales performed fairly uniformly, some English local authorities (7%, accounting for 5% of all British authorities) typically took over six months to deliver adaptations following their approval.

In total, the process at the average local authority took 22 weeks from application to installation for a typical adaptation (23 weeks in England; 14 weeks in Scotland and 18 weeks in Wales). However, some authorities moved much more slowly: three authorities typically took more than 18 months from application to installation, two of them large urban authorities in the North West of England.

Figure 6.3 **Time taken to approve a grant and to install the adaptation (weeks)**

Base: GB, all able to comment on providing adaptations (256)
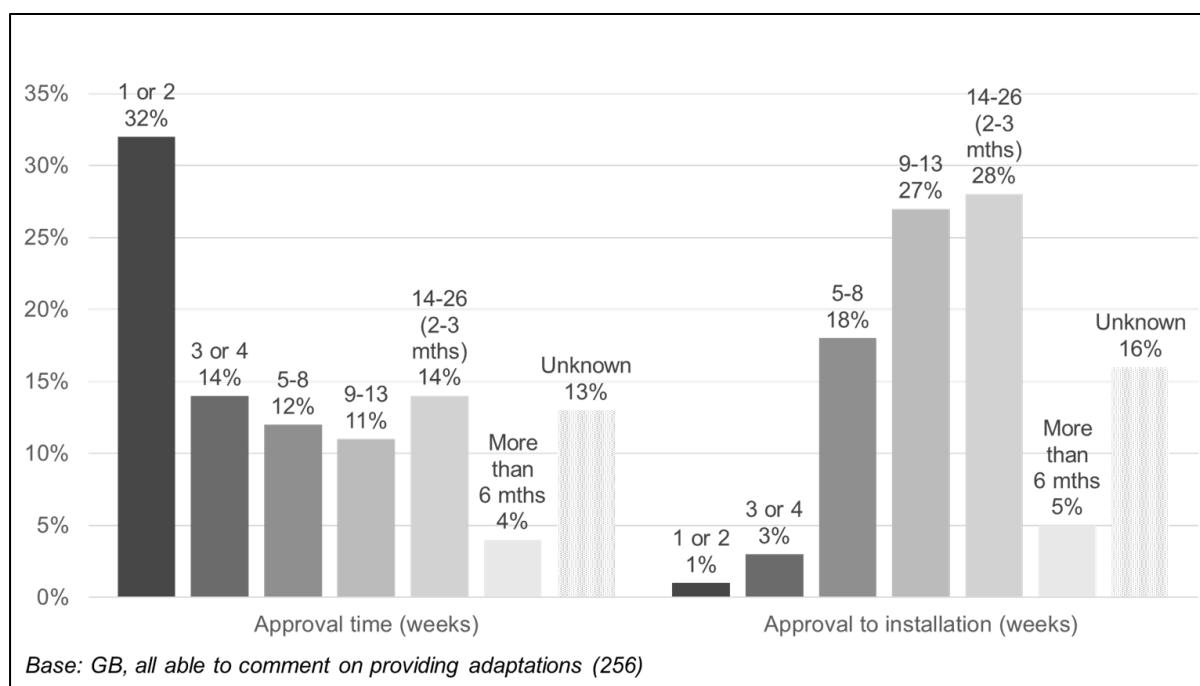
Challenges identified

Given the variations in performance among local authorities administering grants for adaptations, it is worth examining the challenges they identified to the process. No single challenge dominated the process, as shown in Figure 6.4.

Figure 6.4 Challenges identified by local authorities in delivering adaptations

Base: GB, all authorities (317)
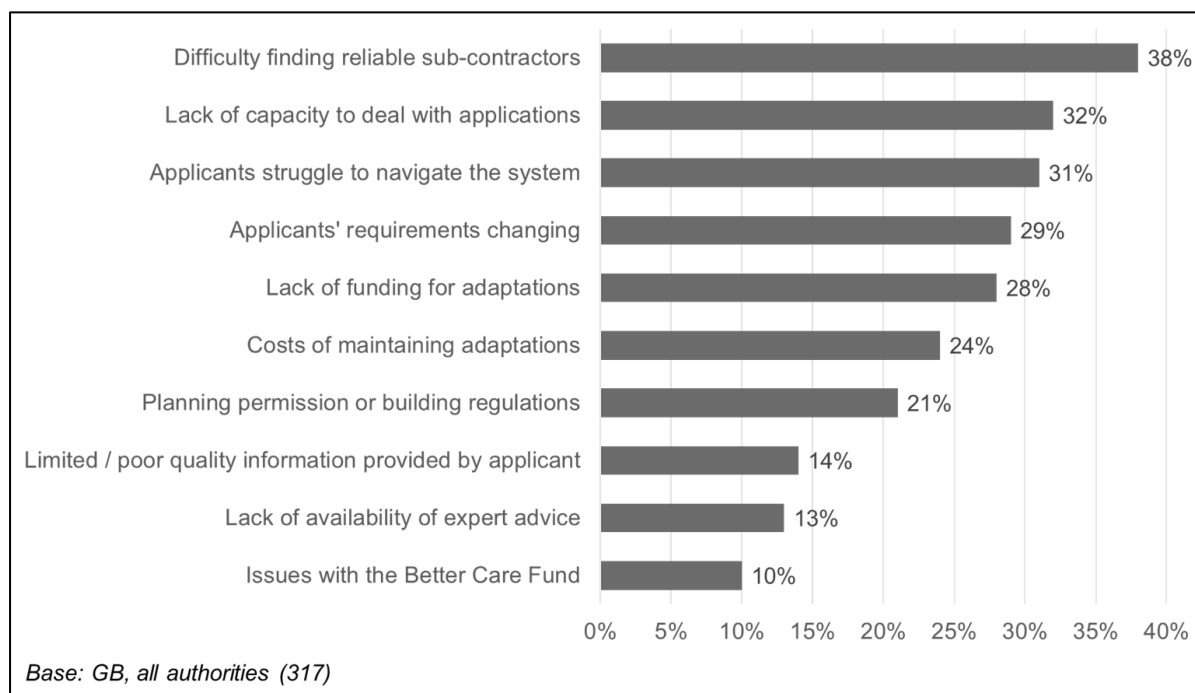
A difficulty finding reliable sub-contractors is the most widespread problem (38%), followed by internal capacity limitations (32%). Around a third (31%) also mentioned the difficulties applicants have in navigating the system.

A lack of funding for the adaptations was mentioned by only around a quarter (28%) but there was substantial geographical variation in concern about funding for adaptations. While in England less than a quarter of authorities felt funding was a problem (23%), this rose to over half in Scotland (55%) and Wales (52%). Within England, it is notable that only 7% of authorities in the South East (which does not include London) were concerned about adaptation funding shortfalls, while 46% found this a concern in the adjacent East of England region, making funding the leading challenge to making adaptations in that part of the country.

The arbitrary nature of the means test used, and particularly the exclusion of outgoings and housing costs from the test, was criticised very strongly by some authorities. The limits on grants of £30,000 in England and £36,000 in Wales were also felt to be too low.

A few authorities also mentioned the difficulty persuading landlords in England and Wales – even social landlords – to allow adaptations to take place, because the provision of the Equality Act 2010 requiring landlords to comply has not yet been brought into force through regulations in England and Wales.

Several authorities also suggested that a shortage of occupational therapists to assess applications was a significant bottleneck in the process. This is a particular issue for district authorities because occupational therapy is a county council (upper tier) responsibility. Some authorities summarised the issues in their comments:

> The means test… does not take account of people's housing related costs and outgoings. In some cases the client's assessed contribution [is] either prohibitive or [must be subsidised by the local authority's] Adult Social Care budget.
>
> - District Council, East Midlands

> In Wales, the DFG limit is £36,000, and this has been so for over ten years. With the [increased] health and safety requirements on site, and increases in costs generally, we are struggling to achieve larger schemes within that cost limit.
>
> - Unitary Authority, West Wales

> Growing numbers of disabled people are living in the privately rented sector, but we are unable to compel landlords to adapt their properties. This can also be a problem in the housing association sector.
>
> - District Council, East of England

> [The] availability of Occupational Therapists from the County Council to carry out assessments [is a barrier].
>
> - District Council, East Midlands

Respondents were also asked what single change would most improve the system. Most commonly, they identified reform of the means test used (21%) although this was mentioned less often in Scotland (7%). An increase in the upper limit for grants under the DFG was also mentioned by 18% of authorities in England and 19% in Wales. Reform of funding arrangements was mentioned by a small proportion across

Britain (13%), but mostly in Scotland (31%) and Wales (29%), and less so in England (9%).

Individual authorities also expressed a variety of specific ideas for specific changes that would help disabled people to live independently. In Scotland, landlords are required, under the Equality Act 2010, to make reasonable adjustments and cannot unreasonably withhold consent, following a request to make adaptations. At present, this does not extend to communal areas. However, a number of Scottish local authorities would like the obligation to be extended to communal spaces, as allowed for in the Act.

The main concern in Scotland, however, was for applicants living in Registered Social Landlord housing. Funding was often reported to run out early in the year for such tenants. In addition, there was perceived to be a 'loophole' in the Scottish legislation requiring landlords to allow adaptations, in that it did not apply to communal spaces such as stairwells.

Also in Scotland, a specific and potentially serious issue with funding adaptations to RSL-owned properties was mentioned by multiple authorities:

> The lack of right to adapt the communal area to access flats in blocks has a negative impact…
>
> - Unitary Authority, Scotland

> There remains an inequity in relation to funding across tenures with Council and private households now under delegated authority of the Health and Social Care Partnership, while RSLs remain funded [directly] by Scottish Government. RSL funding often runs out very early in the year and they [RSLs] report they are unable to use their own resources.
>
> - Unitary Authority, Scotland

Meanwhile, one council in England called for more involvement of the NHS in adaptations, as now happens in Scotland. There was also a suggestion that DFG criteria needed reforming to take a more holistic approach to disabled people's needs:

> I think the NHS could invest more in DFG work as the preventative invest-to-save argument is strong. There is no [financial incentive] for a district council, in relation to our core services.

- District Council, East of England

We can make a level access into the property, but it won't fund a hardstanding [a surfaced area on which to park a car] near to the property to allow people to easily access their vehicle.

- District Council, East Midlands

6.2 Tenancy Support

Scale of provision

About four-fifths (78%) of local authorities provide tenancy support services, aimed at helping tenants to remain in their homes, rising to 91% among large authorities with more than 200,000 residents. The proportion providing tenancy support was also higher in Scotland (90%), Yorkshire and the Humber (93%), Wales (95%) and London (96%).

These services include non-financial support to manage rent arrears, benefits, domestic budgeting including debt counselling, repair issues, neighbour disputes and anti-social behaviour issues that are related to the tenancy. Although not specifically aimed at disabled people, these services have particular relevance because of their potential to help with access to benefits and grants targeted at disabled people, including for example grants for home adaptations.

Traditionally, tenancy support has been provided by social landlords, including councils, as a service exclusive to their tenants. It is important to note that housing associations usually provide tenancy support to their tenants independently of local authorities; this survey could obviously not include this type of support. However, an increasing number of authorities either extend existing tenancy support to residents where they are *not* the landlord, including the private rented sector, or provide (or often commission from a third party) a support service even where they do not have social housing stock themselves.

In line with the above, the survey showed the provision of tenancy support by stock-holding local authorities to be widespread (95%), but less so among those who do not hold housing stock (52%). Among those without their own housing stock, it was also more common to outsource tenancy support. Whilst 70% of stock-holding

authorities directly provided tenancy support in-house, only around a quarter (23%) of those without housing stock did so.

Effectiveness

The substantial difference between stock-holding and other authorities is also seen in their self-assessment of the effectiveness of the service. More non-stock-holding authorities said they do not know if they are meeting demand (31%) than believe they are fully meeting it (14%). Stock-holding authorities are relatively positive: a third (31%) believe they are fully meeting demand, and half (54%) that they are somewhat meeting demand. However, it should be remembered that some stock-holding authorities may be providing support to their own tenants only, so they may have a less ambitious aim in mind. Authorities in Scotland were much more likely to feel they were fully meeting demand for tenancy support (45%) than in England (22%) and Wales (30%).

Those who said the service was not fully meeting demand were asked why. The largest proportion of respondents cited budget or funding limitations (28%), or a lack of service capacity compared with demand (22%), with no other reasons mentioned by more than a tenth of respondents. Some comments were:

> We have problems due to the rural nature of much of our county. We re-structured our tenancy support services a year ago… to provide more consistent services in both urban and rural areas, with one organisation providing services to all client groups in area-based contracts. This has proved very successful, with more people being helped, at lower cost, and with faster access to services. However, there are concerns that the Supporting People budget is going to be cut severely from April 2018, which could jeopardise the improvements which we have made.
>
> - Unitary Authority, West Wales

> Limited specialist advice [is] available, and so a lot of [tenancy support] involves signposting onto other organisations and departments for specific advice.
>
> - Unitary Authority, Scotland

> When housing associations make cutbacks, support services are often the [area most] affected. Private sector landlords aren't required to go

above and beyond when meeting need. Providing support is a luxury and not essential by law to either one of these [types of landlord].

- District Council, North West

Asked about prospects for the future, most local authorities were mildly positive: over a third (36%) said that they expected the service to improve, while a slightly smaller proportion (29%) expected it to worsen. The situation was quite different in Scotland, where just over half (52%) expected improvement and only a small group (14%) expected provision to worsen. Local authorities in Wales were more pessimistic: only a fifth (20%) expected improvement, and nearly half (45%) expected the situation to worsen slightly.

Figure 6.5 **Expected trends in the delivery of tenancy support in the next five years, overall and by nation**

	Worsen significantly	Worsen slightly	No change	Improve slightly	Improve significantly	
GB	10%	19%	18%	25%	12%	16%
England	12%	18%	17%	24%	12%	18%
Scotland	7%	7%	24%	34%	17%	10%
Wales		45%	25%	15%	5%	10%

■ Worsen significantly   ■ Worsen slightly   ■ No change   ■ Improve slightly   ■ Improve significantly

Base: GB, all authorities providing tenancy support (306), England (257), Scotland (29), Wales (20)
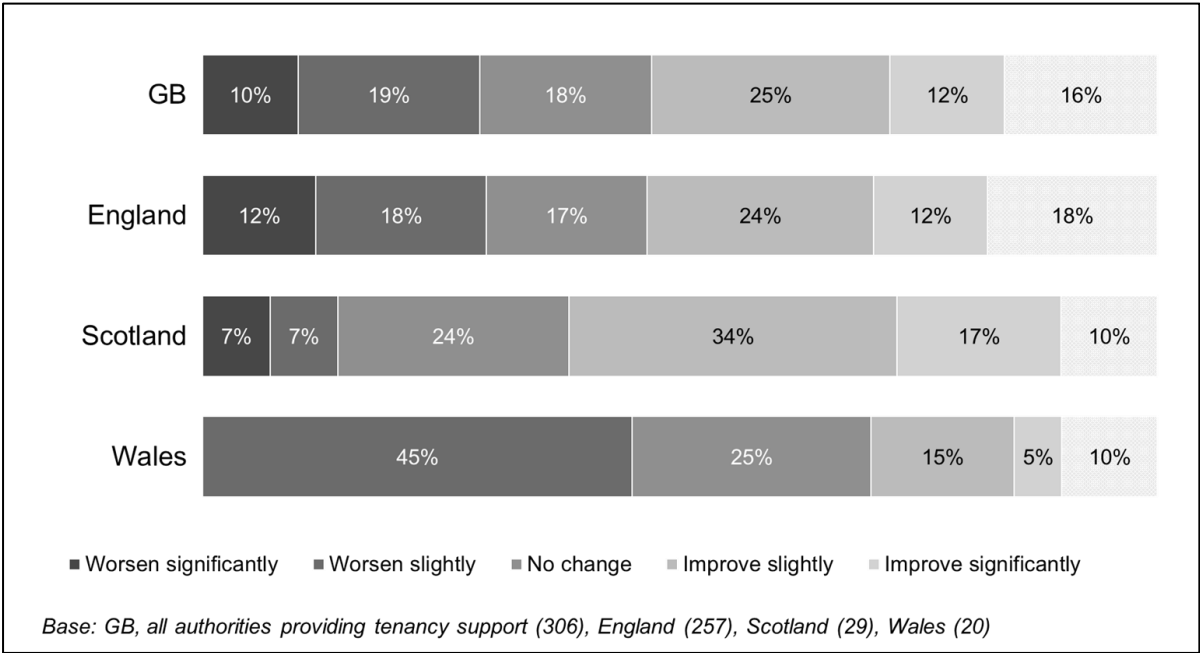
When asked what recent changes to policy or law had made the largest impact on disabled people's ability to maintain a tenancy or live independently, local authorities focused primarily on funding cuts made to Supporting People services. While some suggested there had been increases in efficiency or that they had found ways around cutting services (for example through user charging), others emphasised that they felt there was limited scope to mitigate the impact:

> Supporting People funding was removed two years ago and since then we have implemented a charging system for all new tenants of sheltered homes

who now pay for the service. Existing tenants are subsidised and charges brought in for them incrementally.

- District Council, South West

The overall reduction in local authority funding has meant a reduction in tenancy support and other prevention services. This is not specific to disabled people but may have a disproportionate impact on them given that they already face additional challenges.

- Unitary Authority, West Midlands

These were followed by various concerns regarding welfare reform (27%), more specifically the Universal Credit (17%) and caps on LHA or Housing Benefit (16%).

Changes in welfare benefits including PIP, Universal Credit & ESA have increased the number of disabled residents requiring advocacy and representation.

- London Borough

Figure 6.6 **Changes in policy identified by local authorities as having impacts on disabled people's ability to maintain a tenancy or live independently**

Base: GB, all authorities not feeling able to meet need for tenancy support (178)
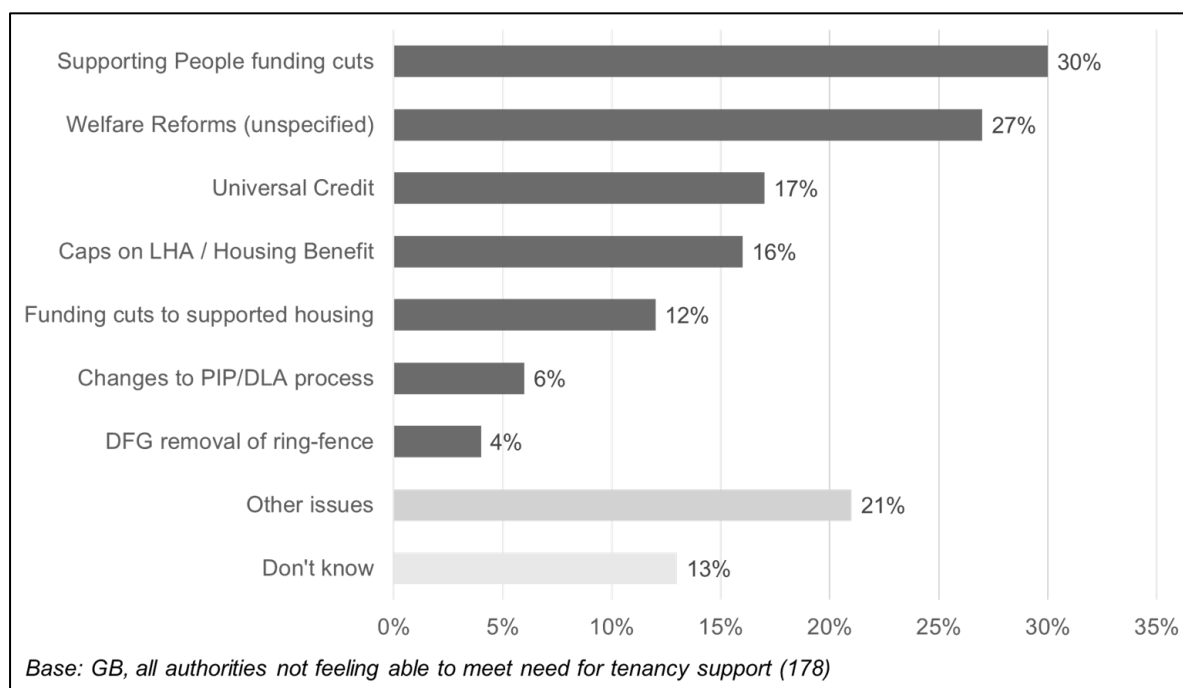
Individual authorities also raised a range of further issues. Although not cited by a large number of respondents, the potential impact of welfare reform on the provision of specialist supported housing seemed particularly relevant to this study:

> We also have concerns about the future viability of existing supported housing schemes as rents are reduced as a result of welfare reform. This has also impacted on the viability of developing new supported housing schemes for vulnerable or disabled clients.

> - District Council, South East

7 | Conclusions

7.1 Introduction

This research has shed light on how local authorities work to ensure disabled people have access to suitable housing, filling important gaps in the evidence base regarding their work in this area. As well as highlighting the areas in which local authorities perform well and less well, it also examines some of the challenges local authorities face in their work.

As noted in the introduction, local authorities enable disabled people to access suitable housing in several connected ways:

- direct provision and allocation of social housing for those unable to afford to rent or buy in the housing market
- setting strategic housing policy, to determine the local requirement for accessible and adaptable homes of all tenures, including for sale
- enforcing planning policy for new developments, to ensure that developers deliver the required number of accessible and adaptable homes
- administering grants available to disabled people to make their homes accessible and suitable for their needs, and
- delivering support to disabled people to sustain both social rented and private rented tenancies.

Some of these areas of policy are very complex and there are many ways in which the survey outcomes could be interpreted. Furthermore, many of the individual issues covered in the report could usefully be investigated in more detail.

However, there are some important conclusions to be drawn, which are outlined below.

7.2   A challenging environment

Lack of data

In a variety of areas of their work, local authorities need to have some idea of the number and range of disabled people likely to require housing and housing-related services of various types, and of how well the existing housing stock in their area caters to their needs. The analysis in Chapter 3 of this report shows significant self-assessed gaps in both areas. Less than a fifth (16%) of authorities feel their data is 'good' or 'very good' for the purposes of estimating the number of disabled people currently inappropriately housed; and less than a tenth (9%) of authorities feel they have a 'good' or 'very good' idea of the proportion of privately owned housing that is accessible (Chapter 4).

This lack of information matters when setting policies and spending priorities. As documented in Chapter 5, national planning policy states that unless a local authority can demonstrate – through producing reliable data to support their position – that there is a local need for accessible housing, the default position is that the developer need not build any at all.

Allocating housing

When allocating affordable or social rented properties to tenants applying to them for housing, as explored in Chapter 4, local authorities rate their own performance highly. Around nine in ten (89%) consider themselves to be either very or quite successful in allocating appropriate housing to disabled people. An even higher proportion (94%) believe themselves to be very or quite effective in their assessments of the housing needs of individual disabled people.

Looking at the detail, however, there are clearly some shortcomings despite this confidence: two-thirds (65%) of local authorities are unable to estimate the proportion of social and/or affordable housing that is accessible, and only around a fifth (22%) have an accessible housing register (rising to 52% in Wales).

Pushing developers to deliver

Local authorities can use planning permissions as a method to push developers to provide accessible and affordable housing, provided they can produce reliable evidence of need, as detailed in Chapter 5. Making these requirements is particularly important in England and Wales, where mandatory standards for accessibility are substantially lower.

However, output remains relatively low, and largely unmonitored. Of the 6% of local authorities that monitored how much of housing built was accessible and/or adaptable, an average of 18% was recorded.

The research identified several points in the planning process at which requirements set by local authorities can get watered down, but most importantly, showed that many local authorities do not try to set targets in the first place. More than half (55%) did not include a target for accessible and/or adaptable housing delivery in their most recent Local Plan or Local Development Plan submitted to an inspector. At least partly as a result, only some (28%) have a general percentage target currently in force, although many (49%) negotiate with developers on a site-by-site basis instead.

Grants and loans for housing adaptations

As detailed in Chapter 6, local authorities in England and Wales administer the Disabled Facilities Grant on behalf of national government. In Scotland a separate scheme run in partnership with local NHS boards has a similar function.

In general, the evidence paints a picture of a high level of acceptance of grants, and many routinely awarding the full costs of adaptations. However, a small number of authorities behave differently: 6% of authorities in England reject more than a quarter of all applications made for adaptations, and 16% cover the full cost in response to less than half of all applications.

The leading reason for refusing applications was the means test, mentioned by 70% of authorities. This test, set at a national or devolved government level, was widely criticised by local authorities as being arbitrary and complex. Landlord consent also remains a significant issue in England and Wales (although less so in Scotland).

In most places, the key issue facing applicants for grants is the pace of approval and installation, which typically takes 22 weeks. Again, some performed much more poorly, with three authorities taking more than 18 months on average from application to installation. Some acted much more quickly, however, suggesting that considerable improvement is possible. Authorities typically said they struggled to find reliable sub-contractors (38%), lacked the staffing capacity to deal with applications (32%), or that the system was too complex for applicants (31%).

Tenancy support

In addition to grants and loans, councils can provide tenancy support to assist residents to remain in their existing homes, as explored in Chapter 6.

About four-fifths (78%) of local authorities provide support, including nearly all large urban authorities. However, few authorities believe they are fully meeting demand (22% in England, 45% in Scotland and 30% in Wales). Most consider this to relate to a lack of budget or funding limitations (28%), or to a lack of service capacity compared with demand (22%). Some local authorities pointed out that this is not a mandatory service to provide, either for them or for other social landlords.

7.3   Variable performance

A common thread throughout the report is the great variability in performance of local authorities on numerous measures, ranging from setting housing targets to timely delivery of adaptations. It is likely much of this is due to performance of staff and teams; for example, variation in the performance in delivering adaptations appears random. This suggests unrealised potential for local authorities to learn from one another. But, in many other areas, performance seems clearly linked to a local authority's circumstances, suggesting that there is also potential to drive change from outside local authorities.

Support from other tiers of government

The distribution of local authorities which are more successfully delivering housing for disabled people is not entirely random: those authorities performing well tend to be located in specific parts of Britain, suggesting that the policies and practices of national and devolved governments play an important role.

Local authorities in Scotland and London generally feel better supported in terms of data; two-thirds (62%) of Scottish authorities have commissioned in-house surveys, compared with a third (35%) in England. They are also more likely than average to be able to state the proportion of local housing which is accessible (52% in Scotland and 46% in London, compared with 30% across Britain). They also generally use more sources in their Housing Market Assessments than in England or Wales. In Scotland, local authorities have access to the Centre for Housing Market Assessment (CHMA), which provides advice on assessing housing need.

In London, the role of the GLA in providing data and encouraging high accessible housing targets is quite visible: 84% of London authorities set targets, and many (although not all) require 100% accessible housing, in line with the London Plan.

In Scotland, despite reportedly better data, a third (34%) of local authorities said they made no effort to push private developers to deliver accessible housing in excess of the mandatory minimum accessibility standard. However, the Scottish mandatory building standard (which local authorities must enforce), is much higher than the English and Welsh equivalents. In combination with the requirement for social and affordable housing built with grant funding to be built to the Housing for Varying Needs Standard, this is likely to mean that new housing delivered in local authorities in Scotland is more accessible in practical terms than in England or Wales, even in cases where local authorities do little to help.

Meanwhile in Wales, again a third (30%) of local authorities made no attempt to push private developers to deliver accessible housing, a potentially more serious situation given that the mandatory minimum standard in Wales is quite low. However, the Welsh government requires all social housing providers to deliver 100% accessible housing to the Lifetime Homes standard, independently of local authorities, which may again have a practical effect on the ability of disabled people to access housing. A drive across Wales to establish accessible housing registers has also had a significant impact, with 52% of local authorities making a register available.

Small authorities

The evidence gathered in this report suggests that smaller local authorities struggle to deliver in some areas; large authorities appear to enjoy important economies of scale. For example, authorities with larger populations – those with more than 100,000 residents – were far more likely to have in-house specialist assessors trained to handle applications for housing from disabled people (78%) than local authorities with fewer than 100,000 residents (22%). Authorities with larger populations were also less likely to hold accessible housing registers (12% compared with 35%).

Structural advantages

In some cases, authorities that hold housing stock, or who deliver tenancy support, appear to perform better in other apparently weakly related areas; for example, only 15% of authorities that do not provide tenancy support services to residents are aware of the proportion of accessible housing in their social or affordable rented stock. Meanwhile, stock-holding local authorities (those who act as landlords in their

own right) are more likely to say that they offer reasonable adjustments, such as support workers, BSL videos or a textphone service.

7.3 Conclusion

In conclusion, local authorities' performance in delivering housing for disabled people is patchy. While this research has shown that local authorities operate in a difficult environment, and the variation in performance by region and devolved nation shows that support from other tiers of government matters a great deal, there is still much that local authorities can do.

Variation in performance between districts in the same county or city can be wide, with disabled people in one district of a county waiting more than a year for an adaptation, while others just a few miles away wait only a few weeks. There is much scope for local authorities to learn from each other, and to improve the experience of seeking housing for disabled people.

Appendix A |
Response rates and technical details

A.1   Response Rates: additional detail

Table A.1 shows the response rate for each region within England; as can be seen the response rate was fairly uniform.

Table A.1   Response rate, by region within England

	Number of authorities eligible for the survey	Number of authorities responding to the survey	Response rate (%)
GB	380	317	83
England	326	267	82
East Midlands	45	36	80
East of England	52	35	67
London	33	26	79
North East	12	11	92
North West	41	34	83
South East	74	56	76
South West	41	26	63
West Midlands	33	26	79
Yorkshire + Humber	22	17	77
Under 100k population	116	93	80
100k to 200k population	169	142	84
200k or more population	95	82	86

Table A.2 shows a breakdown of response rates among authorities, including reasons for non-response. Many local authorities logged in but did not complete the

survey; the main reason given for this was a lack of staff time, rather than any objection to the survey or its content.

Also shown is the number of *organisations* involved; these numbers are lower because some local authorities operate as shared services, although this did not have a substantial effect on the overall response rate.

Table A.2   Response rate, all GB, detail

	Authorities (number)	Authorities (% of those eligible)	Organ-isations (number)	Organ-isations (% of those eligible)
All eligible authorities, lower tier / unitary	380	100	360†	100
Refused	4	1	4	1
Lead contact not found	1	-	1	-
Lead contact found, not logged in	2	1	2	1
Logged into survey, did not start	44	12	40	11
Started survey, did not finish	12	3	10	3
Completed survey	317	83	303	84

† this number may be lower in reality; it is possible that some additional authorities who did not take part were also operating as shared services, but did not inform researchers of this.
- represents a number of less than 0.5%

Where a result shown on a table or chart in this report is significantly different to the overall result shown, with at least a 95% confidence level ($p < 0.05$), this is indicated with a star (*).

A.2   Error Margins

Table A.3 shows the error margins for survey data, overall and for sub-groups, to a confidence level of 95%. Calculations here take into account finite population correction, an adjustment made to take into account the large proportion of local authorities surveyed.

These are worst-case estimates, calculated for a survey result of 50%. Survey results closer to 0% or 100% will have smaller real error margins. For example, if 50% of local authorities responding give a particular response, assuming the sample is representative, we can say that we are 95% confident that the true value for local authorities in England generally is within ±2.2%, that is between 47.8% and 52.2%.

Table A.3   Error margins, by nation, region, authority type and population size

	Number of authorities eligible for the survey	Number of authorities responding to the survey	Error margin† (±%)
GB	380	317	2.2
England	326	267	2.6
Lower tier authorities	201	162	3.4
Unitary / single tier authorities	125	105	3.8
East Midlands	45	36	7.4
East of England	52	35	9.6
London	33	26	9.0
North East	12	11	8.9
North West	41	34	7.0
South East	74	56	6.5
South West	41	26	11.8
West Midlands	33	26	9.0
Yorkshire and the Humber	22	17	11.6
Scotland	32	29	5.7
Wales	22	21	4.7
Under 100k	116	93	4.5
100k to 200k	169	142	3.3
200k or more	95	82	4.0

† on a value of 50%, taking into account finite population correction

Appendix B | Glossary of terms

Glossary

Accessible Housing

Accessible Housing is housing which is accessible to disabled people. There is no single agreed definition for accessible housing. This is partly because what is accessible to one disabled person may be inadequate for another; accessibility in a practical sense is very much dependent on individual requirements.

Having said that, there a range of formally defined standards for accessibility of housing to disabled people, varying by nation. Lifetime Homes is an independently defined standard applicable across Britain, developed by the Housing Association Habinteg, which specialises in housing disabled people (http://www.lifetimehomes.org.uk/). Although some local authorities do refer to it internally, only one authority responding to the survey, in Wales, used it to define accessibility for planning purposes.

In England, standards for accessible housing are legally defined in Part M of the Building Regulations (https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m). However, these standards are widely used only for planning requirements and enforcement; for other purposes, a variety of standards are used. Indeed, several local authorities completing the survey communicated that they did not use any particular definition of accessibility for their own internal purposes (for example Housing Registers), but just relied on the view of staff and/or property owners.

In detail, under Building Regulations in England, all new dwellings must be M4(1) 'visitable dwellings'; this is a mandatory minimum, which is designed to produce a dwelling accessible to a disabled person who can walk, without necessarily making provision for further adaptations. This does not qualify a property as accessible for the purpose of this survey.

Local authorities in England may additionally require a proportion of new housing constructed by developers to be accessible, through the planning system. They may use two standards: M4(2) 'accessible and adaptable dwellings' or M4(3) 'wheelchair user dwellings'. They are prohibited from using any other accessibility standards for this purpose (for example Lifetime Homes).

In Wales, a mandatory minimum level for accessibility of new housing is defined in Part M of the Welsh Building Regulations (http://gov.wales/topics/planning/buildingregs/approved-documents/part-m-access-and-use/?lang=en), which is closely equivalent to the M4(1) 'visitable' standard in England. This does not qualify a dwelling as 'accessible' for the purposes of this survey.

There are no higher standards defined in law in Wales, at the time of writing. In some contexts, however, Lifetime Homes standards (http://www.lifetimehomes.org.uk/) are used by the Welsh Government for the purposes of defining accessible housing, and as a condition of grant funding for Private Registered Providers seeking to construct new housing in Wales. Welsh local authorities have a free choice regarding standards to use for making requirements of developers through the planning system.

In Scotland, a mandatory minimum level for accessibility of new housing is defined in Sections 4.1 and 4.2 of the Building Standards Technical Handbook (https://beta.gov.scot/publications/building-standards-technical-handbook-2017-domestic/). This does not, strictly speaking, qualify a building as accessible for the purposes of this research, but it does substantially exceed the mandatory standards used in England and Wales in ways likely to benefit disabled people greatly, for example requiring the ground floor of a dwelling to be wheelchair accessible throughout and to contain a room suitable for use as a bedroom.

The Housing for Varying Needs, Part 1 wheelchair accessibility standard (https://www.thenbs.com/PublicationIndex/documents/details?Pub=TSO&DocID=201930) developed in 1998 by Scottish Homes, is mentioned in the Building Standards Technical Handbook as being potentially suitable for use as a higher standard than required by law, but is explicitly not endorsed by it. Compliance with it is a condition of grant funding for Registered Social Landlords seeking to build new housing in Scotland. This housing would count as accessible for the purposes of this survey, but local authorities could choose to use another accessible home standard (for example, Lifetime Homes) for making requirements of developers if they wished to do so.

Accessible Housing Register

A register or list of properties, suitable for allocation to people on a local authority's Housing Register, which are accessible to disabled people.

Adaptable Housing

Adaptable Housing is housing which has been designed or has been assessed as being practicable to convert into Accessible Housing, suitable for disabled people. There is no agreed standard for adaptable housing.

Adaptations (to homes)

Changes made to a property, including the addition of equipment or structural modifications that enhance the ability of a disabled person to live independently.

Affordable Housing

Any housing provided at a subsidy relative to the open market value, where the subsidy applies in perpetuity (this would not include Help to Buy or discounted sale where the discount does not apply on resale). Major categories within this include council housing, social housing, social rented housing, affordable rented housing, intermediate rented housing, and some shared ownership schemes.

Affordable Rented Housing

Housing owned by a social landlord and rented at a percentage (up to 80%) of the market value rent for the property, by a social landlord, under regulation by the Homes and Communities Agency (HCA) in England, Scottish Housing Regulator (SHR) or Welsh Government.

Allocation (of housing)

The process under which local authorities match households applying for affordable housing to the available stock of housing, whether that be through a Housing Register and waiting list, or through a Choice Based Lettings (CBL) scheme.

Building Regulations

In England and Wales, the basic rules developers must comply with when building new or renovated housing. Includes Part M, which determines minimum mandatory (and in England, additional optional) standards for accessibility and adaptability of housing.

Building Standards

In Scotland, the basic rules developers must comply with when building new or renovated housing. Includes Chapter 4, which determines minimum mandatory standards for accessibility and adaptability of housing.

Disabled People

For the purposes of this research, disabled people are defined in accordance with the Equality Act (2010). Someone is considered to be a disabled person under the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial' and 'long-term' adverse effect on their ability to carry out normal daily activities (https://www.gov.uk/definition-of-disability-under-equality-act-2010).

EasyRead

EasyRead documents are designed to tell people with learning disabilities what they need to know, in an easy to understand format. EasyRead is not a simple translation of existing documents, nor simply the use of large print or pictures; it also requires consultation with the target audience to select information useful and accessible to them (https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats).

Examination in Public

This is the process by which a Local Plan (in England), Local Development Plan (in Wales) or Housing Strategy and Local Development Plan (in Scotland) is examined by a national or devolved government (HM Planning Inspectorate in England, or the Scottish or Welsh Governments) before it comes into force. This may result in amends, including to the proportion of accessible housing required in new housing developments.

General Needs Housing

Affordable housing let by a Private Registered Provider, Registered Social Landlord, or Local Authority, not offered with additional support, and suitable for most tenants.

Homes and Communities Agency (HCA)

The HCA is a non-departmental public body; for the purposes of this report, its key function is the regulation of social housing providers in England.

Housing Association

A specific type of Registered Social Landlord or Registered Provider; these are private (since privatisation in 1988) and independent of government, but are non-profit making by constitution, and regulated by the Homes and Communities Agency (HCA) in England, Scottish Housing Regulator (SHR) or Welsh Government.

Housing market assessment

Used in this report as an umbrella term, covering the various housing market analyses that local authorities are required by national governments to produce, in order to back up requirements made of developers to deliver various types and sizes of housing, including accessible and adaptable housing. These may include a survey of local households to determine housing requirements, or may rely purely on available secondary data. If an evidence base is not supplied or is found inadequate, local authorities may be legally unable to require developers to deliver accessible or adaptable housing.

Housing Need

Used in this report in the broadest sense of a household's need for housing, rather than the narrow technical definition typically used for the production of housing need estimates in housing market assessments.

Housing Need and Demand Assessment (HNDA)

A wide-ranging study of local people's housing requirements, which all local authorities in Scotland are required to carry out by Scottish Government legislation, supported by the CHMA (Centre for Housing Market Analysis). This is used to gather evidence to back up targets for the delivery of affordable and market housing (http://www.gov.scot/Topics/Built-Environment/Housing/supply-demand/chma/hnda)

Intermediate Rent Housing

A tenure of housing which charges rent at a fixed point between market rent and social rent, as set by Homes and Communities Agency regulation.

Local Housing Market Assessment (LHMA)

A wide-ranging study of local people's housing requirements, used to gather evidence to back up the delivery of affordable and market housing, which all local authorities in Wales are asked to carry out by Welsh Government:

(http://gov.wales/topics/housing-and-regeneration/publications/starthouseassessguide/?lang=en).

Local Development Plan

In Wales, this is the main local planning document, outlining a local authority's intended development for the area, in terms of types of development, locations and timing. It incorporates the local Housing Strategy, including the requirement made of developers for accessible housing. It is subject to public consultation, and an assessment via an Examination in Public by the Welsh Government, which may result in amends being made, before it comes into force.

In Scotland, this is the main local planning document, outlining a local authority's intended development for the area, in terms of types of development, locations and timing. It is subject to public consultation, and an assessment via an Examination in Public by the Scottish Government, which may result in amends being made, before it comes into force. Although it contains the requirement made of developers for affordable housing, it does not incorporate the Housing Strategy, which in Scotland is examined and approved separately by the Scottish Government.

Local Plan

In England, this is the main local planning document, outlining a local authority's intended development for the area, in terms of types of development, locations and timing. It incorporates the local Housing Strategy, including the requirement made of developers for accessible housing. It is subject to public consultation, and an assessment via an Examination in Public by HM Planning Inspectorate, which may result in amends being made, before it comes into force.

Market Housing

Housing sold on the open market or let to tenants on the open market, not under Homes and Communities Agency regulation. Covers both private rented housing and owner-occupied housing, and some shared ownership schemes.

National Planning Policy Framework (NPPF)

A short document issued by the Department for Communities and Local Government (DCLG) which replaced the former Planning Regulations for England in 2012 (https://www.gov.uk/government/publications/national-planning-policy-framework--2).

Population Needs Assessment (PNA)

In Wales, an assessment of the requirements of a Local Authority's population for care and support, which local authorities are required to carry out under the Social Services and Well-being (Wales) Act 2014.

Private Registered Provider (PRP)

In England, a provider of affordable housing registered with the Homes and Communities Agency which is not a local authority or government agency – for example a Housing Association or Almshouse Charity.

Private Rented Housing

Housing let to tenants privately, not under Homes and Communities Agency regulations, with the landlord setting rent levels independently. Despite the name, this can be provided (and is quite widely provided) by independent social landlords and/or local authorities, in addition to their affordable and/or social housing stock. Sometimes referred to as the Private Rented Sector (PRS).

Public Sector Equality Duty (PSED)

Under section 149 of the Equality Act 2010, public sector bodies have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. In this context, public bodies have a duty to take into account the needs of disabled people in their policies and practices (https://www.legislation.gov.uk/ukpga/2010/15/section/149).

Reasonable adjustments

Steps taken to ensure equality for disabled people, which may mean changing the way in which services are delivered, for example by providing extra equipment and/or the removal of physical barriers.

Registered Provider (RP)

In England, a provider of affordable housing registered with the Homes and Communities Agency – for example a Housing Association or Almshouse Charity. Local Authorities can be Registered Providers (RPs), but not Private Registered Providers (PRPs).

Registered Social Landlord (RSL)

In Scotland and Wales, a provider of affordable housing registered with the Scottish Government or Welsh Government – for example a Housing Association or Almshouse Charity. This term excludes Local Authorities; it was also previously used to describe Private Registered Providers (PRPs) in England.

Scottish Housing Regulator (SHR)

A non-ministerial department of the Scottish Government; for the purposes of this report, its key function is the regulation of social housing providers in Scotland.

Screen Reader

A piece of software which reads out website content, to make it accessible to those with difficulties seeing written text. Websites usually need to be designed with the use of screen readers in mind for them to work effectively.

Section 75 (s.75)

This is the main mechanism for the delivery of affordable housing in Scotland. Section 75 of the Town and Country Planning (Scotland) Act (1997) allows local authority planning departments to require contributions, arrangements or place restrictions on housing developers as Planning Agreements or Planning Obligations. Applicants can offer such agreements unilaterally or negotiate and agree them as support for their application. They may take the form of requirements to build a particular type of housing, an additional facility, or a financial contribution toward such things being provided off-site.

Section 106 (s.106)

This is the main mechanism for the delivery of affordable housing in England and Wales. Section 106 of the Town and Country Planning Act (1990) allows local authority planning departments to agree contributions, arrangements or place restrictions on housing developers as Planning Agreements or Planning Obligations. Applicants can offer such agreements unilaterally or negotiate and agree them as support for their application. They may take the form of requirements to build a particular type of housing, an additional facility, or a financial contribution toward such things being provided off-site.

Shared Ownership housing

A tenure of housing where the occupier of a dwelling buys a proportion of the property and pays rent on the remainder, typically to a local authority or housing association (in which case it would usually be considered a form of affordable housing) but sometimes also to a private landowner (in which case it would usually be considered a form of market housing).

Shared Service

Where multiple local authorities share staff, in order to provide one or more services to the participating local authority areas.

Social Housing

Defined in this report as including all rented housing tenures which are provided under regulation from the Homes and Communities Agency (HCA) in England, Scottish Housing Regulator (SHR) or Welsh Government, and allocated on the basis of need rather than advertised.

Social Landlord

Used in this report as an umbrella term for landlords that are charitable or public sector rather than private (for example Registered Social Landlords (RSLs) and Local Authorities); in England this term is synonymous with Registered Provider (RP).

Social Rented Housing

Housing owned by a social landlord, and let to tenants at social rent, which is specified by the Homes and Communities Agency (HCA) in England, by the Scottish Housing Regulator (SHR) or Welsh Government.

Supported Housing

Social or affordable housing let by a Private Registered Provider, Registered Social Landlord or Local Authority, including a package of additional support from the landlord or their sub-contractor.

Supporting People

Supporting People is a UK Government programme helping vulnerable people in England and Wales live independently and help them to remain in their home. Initially, it was to help tenants maintain their social housing tenancies, but it has

since been broadened to provide housing related support for anyone regardless of housing status. This includes private and social tenants, home owners, homeless people and those in temporary accommodation as well as people in sheltered accommodation or other specialist housing. It is run by local government and provided by the voluntary sector.

Tenancy Support

Support, advice and advocacy provided to tenants of any tenure of rented housing typically, but not exclusively, by a social landlord, to help them to maintain their tenancy. This may cover non-financial support with managing rent arrears, benefits, domestic budgeting including debt counselling, repair issues, neighbour disputes, anti-social behaviour issues that are related to the tenancy, and advice in accessing other services.

Tenure (of housing)

The legal framework under which a property is occupied; this would include the long-established main tenures of owner-occupation, private rent and social rent, and the various minor tenures which combine elements of these.

Textphone, text relay or next generation text

A phone service which operates through text rather than audio, targeted at people with a hearing impairment. It requires specialist equipment; it is significantly different from a normal SMS text or webchat service.

Viability Assessment

An assessment of the viability of a housing development, prepared by an independent consultant to a fixed methodology determined in English or devolved national planning guidance. Typically, these are generic studies of hypothetical sites commissioned by local authorities as part of the production of a Housing Strategy, Local Plan or Local Development Plan. For a major development, a bespoke assessment is usually carried out, either by a local authority or a developer (or, if a dispute arises, both).

Viability assessments consider whether a development is financially viable, taking into account the cost of land, the cost of development, likely sales prices or rents, planning requirements, and an arbitrarily set reasonable incentive for development (that is, profit margin for those involved). They are typically used to determine if a

planning requirement – including for accessible housing – under Section 106, Section 75 or any other regulation, is reasonable.

Appendix C | Questionnaire

S   Screener

S1   **Welcome to the EHRC Disability and Housing survey. This survey is being carried out by IFF Research on behalf of the Equality and Human Rights Commission, as part of a new EHRC inquiry into how the rights of disabled people to independent living are being fulfilled through housing provision and tenancy support.**

It is intended to help the EHRC understand what local authorities are providing for disabled people in terms of housing, and how much variation in approach there is around the country, by region and between local authorities – as well as the challenges and opportunities they face. This will help the EHRC build a picture of current provision and the rationale behind it.

The survey is voluntary at this stage and the EHRC is confident that you will wish to participate in a spirit of transparency and openness. However, in the event that it has concerns regarding the response rate or the evidence submitted, it will consider using its legal powers to compel full completion of the questionnaire.

In addition to the survey, the information gathering will also include in-depth interviews with selected local authorities and other relevant organisations and government departments.

You're reading this because you have been identified by IFF Research as the person most likely to have an overview of policy decisions at <AUTHORITY> **regarding housing and disabled people. If you're not the right person, please indicate this below, and if possible let us know who the correct person would be.**

You can access a PDF version of the survey questions <u>here</u>, which you could use to collect the data from colleagues before entering it into the online survey. Please do not send a completed paper questionnaire back to us – we need the responses to be entered into the online survey.

<u>The deadline for completing the survey is Friday 8th September 2017.</u>

I'm the person described above, or I have been asked by them to take part – **<u>start now</u>**	1
I'd like more information to help me decide whether I should take part	1

ASK ALL (IF CONTINUING, S1 = 1)

S3   **Because this survey is part of an EHRC inquiry, what you say here will be submitted to the EHRC for the purposes of carrying out the inquiry, attached to your name and organisation. However, we would like to reassure you that nothing you provide would be put in the public domain that would identify you as an individual without your consent.**

You may be contacted by IFF Research or EHRC regarding your responses.

Yes, I agree to this	1
No, I can't agree to this	2
I'd like more information to help me decide whether I should take part	3

IF S3 = 2, DISPLAY: **Unfortunately, because of the terms of the EHRC inquiry, we are unable to proceed with the survey without consent to connect your organisation and your responses to the survey.** <SHOW CONTACT DETAILS FOR SURVEY>

IF S3 = 2 (DON'T AGREE) THANK AND CLOSE.

SHOW ALL

S4   **We realise it's possible you might not be able to complete every question in the survey from your own knowledge, for example those requesting data on specific schemes.**

In that case, as an alternative to gathering data from colleagues yourself, you can refer questions to other colleagues, at <AUTHORITY> **or at a sub-contractor or shared service. First, please fill in questions you can't complete yourself with "don't know" responses, and then follow the instructions at the end of the survey for referring the survey to another person, directing them to specific questions you'd like them to respond to if possible. Please note they will be able to see your other responses.**

Alternatively, you can access a PDF version of the survey questions <u>here</u> which you could use to collect the data from colleagues before entering it into the online survey. Please do not send a completed paper questionnaire back to us – we need the responses to be entered into the online survey.

[IF FILLING IN EXTRA QUESTIONS FOR LEAD RESPONDENT: **We believe you're taking part in this survey since** <LEAD RESPONDENT NAME>**, who has already filled in the survey on behalf of** <AUTHORITY> **has referred it to you to fill in some questions they don't have the answers to.**

If you're at all unsure what you need to fill in, please contact them on <LEAD RESPONDENT EMAIL> **or** <LEAD RESPONDENT PHONE NUMBER>**. You'll need to step through the survey until you reach the relevant questions by pressing the right arrow – please do not amend any responses already filled in without their consent.**

If you have any difficulty identifying the questions you've been asked to answer, you can access a PDF version of the survey questions <u>here</u>.]

You can pause the survey at any time – saving your answers – by pressing the middle "pause" button below. Please note that for technical reasons you will be unable to return to the survey for a few minutes afterwards.

FURTHER INFORMATION

On 14th December 2016 the Equality and Human Rights Commission (EHRC) launched a formal inquiry on housing for disabled people. It will look at whether the availability of accessible and adaptable housing, and the support services around it, is fulfilling disabled people's rights to live independently. The inquiry will cover England, Scotland and Wales.

The EHRC has a legal power, under section 16 of the Equality Act 2006, to conduct an inquiry into anything relating to its equality and human rights duties. This helps them to collect evidence to gain a clear picture of a particular sector or issue, where they feel there is a benefit to wider society. They can then use the findings to make recommendations, to which people and organisations must have regard.

Your responses will be held securely and not published in connection with your name or organisation name, without your consent; however EHRC do require the data to be provided to them associated with local authority name, so that they can examine the situation of individual local authorities in context.

The Equality Act 2006 makes it clear that an Inquiry report cannot state or imply that a particular organisation or person has committed an unlawful act, or include any information that could lead to an organisation or person being identified as having done so. The report will not identify local authorities except as an example of good practice from which other local authorities can learn, or if it is essential to reflect the findings of the inquiry. If the commission wishes to gather further information regarding the performance of your authority, following your responses to this questionnaire, then it will contact your organisation directly in accordance with its compliance and enforcement policy.

<SHOW CONTACT DETAILS FOR SURVEY>

About you and your organisation

DISPLAY FOR ALL
First of all, we just need a little background information on you and the Local Authority or authorities you represent. We're happy to take responses which cover multiple local authorities, where there is a shared service or if you're a sub-contractor working with more than one local authority.

ASK ALL
A1   **Are you responding on behalf of…**

PLEASE SELECT ONE ONLY

<AUTHORITY> only	1
A shared service, covering more than one local authority	2
A sub-contractor working with only one local authority	3
A sub-contractor working with many local authorities	4
None of the above (PLEASE SPECIFY)	5
Don't know	6

IF A1 = 2 (RESPONDING FOR SHARED SERVICE)
A2   **Please use the box below to tell us which Local Authorities your response relates to.**

WRITE IN	
Don't know	1

IF A1 = 2 (RESPONDING FOR SHARED SERVICE)
From now on in this survey we will refer to this group of authorities as the "Shared Service".

IF A1 = 3 OR 4 (RESPONDING FROM SUB-CONTRACTOR)
A3   **We're unfortunately unable to take responses from sub-contractors to the authority, unless in exceptional circumstances, for example where a sub-contractor handles all housing policy and strategy decisions for** <AUTHORITY>**. <SHOW CONTACT DETAILS FOR SURVEY>**

IF A1 = 3, 4, 5 OR 6 THANK AND CLOSE.

<table>
<tr><td colspan="3">TITLE   **DUMMY VARIABLE, DO NOT ASK**

DS: TAKE FROM TITLE ON SAMPLE,</td></tr>
<tr><td>local authority</td><td>1</td><td>IF A1 = 1</td></tr>
<tr><td>shared service</td><td>2</td><td>IF A1 = 2</td></tr>
</table>

B   About the housing in your area

ASK ALL

B1   **Thinking about housing in the** <TITLE>**'s area, how good would you say the information you hold on the accessibility of local accommodation is for each of the following tenures, taking into account both the proportion of properties covered, and the accuracy of the information?**

PLEASE SELECT ONE OPTION PER ROW

	Very good	Good	Poor	Very poor	None at all	Don't know what information we have	Not applicable – our area does not have this type of housing
_1 Housing owned by the council	1	2	3	4	5	6	7
_2 Housing owned by[IF ENGLAND: Private Registered Providers][IF SCOTLAND OR WALES: Registered Social Landlords]	1	2	3	4	5	6	7
_3 Private rented housing offered to people who apply to the council for housing	1	2	3	4	5	6	7
_4 Other market housing	1	2	3	4	5	6	

IF ANY B1_# = 1 TO 4 (HOLD ANY INFORMATION)

B2   **Does the information you hold on accessibility for those tenures of housing include…**

PLEASE SELECT ALL THAT APPLY

DS: SHOW ONLY ITERATIONS WHERE B1_# = 1 TO 4 (INFORMATION HELD)

	Detailed level of accessibility (beyond 'yes /	Specific adaptations made	Potential for other properties to be made accessible	None of these	Don't know

	no')				
_1 Housing owned by the council	1	2	3	4	5
_2 Housing owned by[IF ENGLAND: Private Registered Providers][IF SCOTLAND OR WALES: Registered Social Landlords]	1	2	3	4	5
_3 Private rented housing offered to people who apply to the council for housing	1	2	3	4	5
_4 Other market housing	1	2	3	4	5

IF SCOTLAND (SCOTLAND)

B2A **Does your organisation operate a Common Housing Register, or in other words oversee the allocation for social housing for some (or all) Registered Social Landlords in your area?**

Yes	1
No	2
Don't know	3

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

B3 **Does your organisation have (or share with other local authorities) a stand-alone register of accessible and/or adaptable housing which you use in the allocation of housing?**

PLEASE SELECT ONE ONLY

Yes – we have a register and it is made available to those seeking housing	1
Yes – we have a register but it is not made publicly available	2
No – we don't have a register	3
Don't know	4

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

B4 **Does your main property register**[IF B3 = 1 OR 2: **or dedicated accessible property register**] **provide detailed information on the suitability of properties for different types of impairments?**

For example, this would include whether or not a particular property is suitable for a wheelchair user.

Yes	1

No	2
Don't know	3

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

B5 **And how successful are you at matching suitable properties to disabled people with specific impairments?**

PLEASE SELECT ONE ONLY

Very successful	1
Quite successful	2
Not very successful	3
Not at all successful	4
Don't know	5

IF B1_1 = 1 TO 4 OR B1_2 = 1 TO 4 (IF NOT ALREADY STATED NO INFORMATION IS HELD)

B6 **What percentage of social or affordable rented housing in the** <TITLE>**'s area is accessible, including both council-owned and** [IF ENGLAND:**Private Registered Provider**][IF SCOTLAND OR WALES:**Registered Social Landlord**] **owned housing?**

PLEASE ESTIMATE IF YOU DON'T KNOW THE EXACT FIGURE

DS: ALLOW 0 TO 100.

WRITE IN	
Don't know	1

C Housing allocation

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C1A **How many people are currently waiting for an accessible home in <AUTHORITY>?**

Please write in the box below.

DS: ALLOW NUMERIC 0 TO 10,000,000

WRITE IN	
Don't know	1

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C1 **What was the average length of time in calendar months spent on your housing register for applicants who required an accessible dwelling as of 31st December 2016?**

Please include **both those applying** for general needs and supported housing.

DS: ALLOW NUMERIC 0 TO 1000. ALLOW 1DP.

WRITE IN (MONTHS)	
Don't know	1

IF C1 ASKED AND C1 ≠ CODE 1 (DK)

C2 **And what was the average length of time in calendar months spent on your housing register for all other applicants (i.e. not requiring an accessible dwelling) as of 31st December 2016?**

Please include both those applying for general needs and supported housing.

DS: ALLOW NUMERIC 0 TO 1000. ALLOW 1DP.

WRITE IN (MONTHS)	
Don't know	1

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C3 **When the** <TITLE> **accepts that an applicant needs an accessible or adapted home, but cannot provide one, due to lack of availability, do you…**

PLEASE SELECT ALL THAT APPLY

Explore options to adapt their current home	1
Explore options to adapt an available but currently inaccessible property	2
Explore options for the tenant to go into residential care or other type of accessible housing scheme	3

Suggest they carry on waiting for now (depending on anticipated length of wait)	4
Explore options in the private sector	5
None of the above	6
Other (PLEASE SPECIFY)	7
Don't know	8

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C4 **What happens when a disabled applicant turns down the offer of an accessible property?**

PLEASE SELECT ONE ONLY

Nothing – their priority level remains the same	1
The applicant's priority level is downgraded slightly (for example by moving the applicant down to a lower band or grade)	2
The applicant loses all priority	3
Other (PLEASE SPECIFY)	4
Don't know	5

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C5 **Please tell us how the** <TITLE> **assesses the housing needs of disabled people who need an accessible home.**

PLEASE SELECT ALL THAT APPLY

We have in-house specialist assessors who deal with these applications	1
We have established a contract with an external organisation to provide this service	2
We rely on the advice of external occupational therapists (e.g. NHS)	3
The general allocations team is trained to assess applications of this kind	4
We rely mainly on the information provided in the application, and request applicants provide further evidence when appropriate to assess need	5
Other (PLEASE SPECIFY)	7
Don't know	7

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C6 **Overall, how effective is your organisation at assessing the needs of disabled people who need an accessible home?**

PLEASE SELECT ONE ONLY

Very effective	1
Quite effective	2
Not very effective	3
Not at all effective	4
Don't know	5

IF COUNTRY ≠ 3 OR (SCOTLAND AND (B2A = 1 OR B1_1 = 1 TO 6))

C7 **Which of these reasonable adjustments does your organisation provide to assist disabled people to communicate with and/or receive information from the <TITLE> about housing?**

Please do not include reasonable adjustments which may be provided by a third party such as a charity, unless they are paid by the <TITLE> to provide that service.

PLEASE SELECT ALL THAT APPLY

EasyRead information (*this is not large print – hover for more information*)	1
Large print information	2
Screen reader compatible website	3
Textphone service for hard of hearing	4
Support worker or advocate	5
BSL (British Sign Language) videos and/or interpreters	6
Other (PLEASE SPECIFY)	7
None of the above	8
Don't know	9

D Planning for the future

ASK ALL

D1   **Does your organisation have a** [IF ENGLAND: **Strategic Housing Market Assessment (SHMA)**][IF SCOTLAND: **Local Housing Need and Demand Assessment (HNDA)**][IF WALES: **Local Housing Market Assessment (LHMA)**]**?**

Yes	1	
No	2	
Don't know	3	

IF D1 = 1 (HAS MARKET ASSESSMENT)

D2   **Which, if any, of the following sources of data, does the** <TITLE> **currently use for assessing the need for accessible and/or adaptable housing for the purposes of the**[IF ENGLAND: **Strategic Housing Market Assessment (SHMA)**][IF SCOTLAND: **Local Housing Need and Demand Assessment (HNDA)**][IF WALES: **Local Housing Market Assessment (LHMA)**]**?**

PLEASE SELECT ALL THAT APPLY

[IF ENGLAND OR WALES: Census 2011][IF SCOTLAND: Scotland's Census 2011]	1
DWP Disability Living Allowance claimant data	2
DWP Personal Independence Payment claimant data	3
People registering with the council as blind, partially sighted or deaf	4
People registering with the council with another type of disability	5
Blue Badge registrations	6
NHS data	7
Household surveys	8
[IF ENGLAND: Private Registered Provider][IF SCOTLAND OR WALES:Registered Social Landlord] data	9
IF SCOTLAND: Centre for Housing Market Analysis (CHMA)	10
IF WALES: Population Needs Assessment	11
[IF SCOTLAND: Scottish Government data][IF WALES: Welsh Government data]	12
Any other sources (PLEASE SPECIFY)	13
Don't know	14

ASK ALL

D3 **Thinking about data you have available on the housing needs of disabled people in your area, including any local surveys or research the** <TITLE> **may have commissioned, we'd like you to rate the usefulness of that data for estimating the population and housing needs of disabled people.**

For each of the following purposes, we'd like you to rate the data you have available for usefulness to the authority (taking into account how up-to-date it is, as well as availability and general quality). Please do so on a scale ranging from very poor (1) to very good (5).

PLEASE SELECT ONE OPTION PER ROW

	Very poor					Don't know
_1 Estimating the total number of disabled people living in the <TITLE> area	1	2	3	4	5	6
_2 Estimating the number of people with specific disabilities	1	2	3	4	5	6
_3 Estimating the number of disabled people currently inappropriately housed	1	2	3	4	5	6
_4 Estimating the number of disabled people currently in residential care who could live independently if appropriate housing were available	1	2	3	4	5	6
_5 Estimating the number of people in the area likely to require an accessible home in the future	1	2	3	4	5	6
_6 Estimating demand for specific adaptations in the home	1	2	3	4	5	6
_7 Estimating future demand for tenancy support from disabled people	1	2	3	4	5	6
_8 Overall usefulness	1	2	3	4	5	6

ASK ALL

D4 **What further information would enable you to better understand the housing needs of local disabled people, if anything?**

WRITE IN	
Don't know	1

ASK ALL

D5 **How does the** <TITLE> **discharge its duty under s149 of the Equality Act 2010 (Public Sector Equality Duty) in respect of formulating and monitoring the housing assessment element of the local plan?**

PLEASE SELECT ONE ONLY

Conduct an Equality Impact Assessment on Local[IF SCOTLAND OR WALES: Development] Plan generally	1
Conduct an Equality Impact Assessment on the[IF ENGLAND: SHMA][IF SCOTLAND: HNDA][IF WALES: LHMA] specifically	2
Disabled peoples housing needs are subject to specific discussion / scrutiny when formulating the[IF ENGLAND: SHMA][IF SCOTLAND: HNDA][IF WALES: LHMA]	3
None of the above	4
Don't know	5

IF D1 = 1 (HAS MARKET ASSESSMENT)

D6 **Please tell us whether your**[IF ENGLAND: **Strategic Housing Market Assessment (SHMA)**][IF SCOTLAND: **Local Housing Need and Demand Assessment (HNDA)**][IF WALES: **Local Housing Market Assessment (LHMA)**] **has been assessed, or is currently being assessed as part of your Local**[IF SCOTLAND OR WALES: **Development**] **Plan examination by**[IF ENGLAND: **an Inspector appointed by the Secretary of State**][IF WALES: **a Planning Inspector appointed by the Ministers of the Welsh Government**][IF SCOTLAND: **a Reporter appointed by the Scottish Ministers**]**.**

PLEASE SELECT ONE ONLY

Yes – our[IF ENGLAND: SHMA][IF SCOTLAND: HNDA][IF WALES: LHMA] and Local[IF SCOTLAND OR WALES: Development] Plan has been approved	1
Yes – currently under examination	2
Yes – the examination is complete, but either the [IF ENGLAND: SHMA][IF SCOTLAND: HNDA][IF WALES: LHMA] or Local[IF SCOTLAND OR WALES: Development] Plan was not approved	3
No – no examination process of the Local [IF SCOTLAND OR WALES: Development] Plan has yet been carried out	4
Don't know	5

IF D6 = 1 OR 3 (PLAN APPROVED OR REFUSED)

D7 **Did the examination of the Local**[IF SCOTLAND OR WALES: **Development**] **Plan result in…**

PLEASE SELECT ALL THAT APPLY

An amendment to require more accessible and/or adaptable housing	1
An amendment to require less accessible and/or adaptable housing	2

Approval without changes of the amount of accessible and/or adaptable housing required	3
Neither - the[IF ENGLAND: SHMA][IF SCOTLAND: HNDA][IF WALES: LHMA] / Local[IF SCOTLAND OR WALES: Development] Plan did not include a requirement for a specific quantity of accessible and/or adaptable housing	4
Don't know	5

ASK ALL

D8 **Does the** <TITLE> **have any of the following types of planning policies to encourage the construction of accessible and/or adaptable housing?**

PLEASE SELECT ALL THAT APPLY

Set a target percentage of housing built by developers on most or all developments to be accessible and/or adaptable	1
Negotiate with developers on a site-by-site basis for the delivery of accessible and/or adaptable housing	2
Encourage developers to deliver accessible and/or adaptable housing in any other way	3
None of the above	4
Don't know	5

IF D8 = 1 (REQUIRE PERCENTAGES OF HOUSING TO BE ACCESSIBLE/ADAPTABLE)

D9 **What percentage of new homes are required to be built to the following standards, in a normal development?**

DS: ALLOW 0 TO 100.

	%	Don't know
IF ENGLAND: Optional Building Regulations Part M4(2) – accessible and adaptable	*WRITE IN*	1
IF ENGLAND: Optional Building Regulations Part M4(3) – wheelchair user dwellings	*WRITE IN*	1
IF SCOTLAND OR WALES: Lifetime Homes	*WRITE IN*	1
IF SCOTLAND: Housing for Varying Needs Part 1	*WRITE IN*	1
IF SCOTLAND OR WALES: Accessible and/or adaptable housing to any other standard in excess of mandatory planning requirements	*WRITE IN*	1

D9Dum **DUMMY VARIABLE, DO NOT ASK**

Percentage of new homes required to be accessible and/or adaptable overall	= D9_1 + D9_2 + D9_3 + D9_4 + D9_5 IF ALL D9_# ASKED = CODE 1, SET TO -1

IF D9DUM > 100, RE-ASK D9, SHOWING: **The figures you gave total to more than 100% of all housing; please could you check if this is correct?**

ASK ALL

D10 **Whether as a result of decisions made locally or nationally, are there any** [IF D8 = 1: *additional*] **requirements for ensuring a certain standard of accessibility and/or adaptability in housing built by the council or** [IF ENGLAND: **Private Registered Providers**][IF SCOTLAND OR WALES: **Registered Social Landlords**]**?**

PLEASE SELECT ALL THAT APPLY

A different percentage of social / affordable rented housing *built by/for the council* must be accessible and/or adaptable	1
A different percentage of affordable housing for sale or part-sale *built by/for the council* must be accessible and/or adaptable	2
A different percentage of social / affordable rented housing *built by/for* [IF ENGLAND: *Private Registered Providers*][IF SCOTLAND OR WALES: *Registered Social Landlords*] must be accessible and/or adaptable	3
A different percentage of affordable housing for sale or part-sale *built by/for* [IF ENGLAND: *Private Registered Providers*][IF SCOTLAND OR WALES: *Registered Social Landlords*] must be accessible and/or adaptable	4
None of the above	5
Don't know	6

IF D10 = 1 TO 4 (ADDITIONAL TENURE-SPECIFIC REQUIREMENTS)

D11 **What percentage of these types of housing you just mentioned need to be accessible and/or adaptable, to a standard in excess of mandatory planning requirements?**

DS: SHOW ONLY ITERATIONS SELECTED AT D10. ALLOW 0 TO 100.

	%	Don't know
Social / affordable rented housing built by/for the <TITLE>	*WRITE IN*	1
Affordable housing for sale or part-sale built by/for the <TITLE>	*WRITE IN*	1
Social / affordable rented housing built by/for [IF ENGLAND:Private Registered Providers][IF SCOTLAND OR WALES: Registered Social Landlords]	*WRITE IN*	1
Affordable housing for sale or part-sale built by/for [IF ENGLAND:Private Registered Providers][IF SCOTLAND OR WALES: Registered Social Landlords]	*WRITE IN*	1

IF D8 = 1 (HAVE A TARGET)

D12   **You said you had a target** [D9DUM >= 1: **of** <D9DUM>**%**] **for the proportion of new housing required to be accessible and/or adaptable. In practice, roughly what percentage would you say is actually delivered as a proportion of all new housing constructed?**

DS: ALLOW 0 TO 100

WRITE IN 	
Don't know	1

IF D8 = 1 OR 2 (ANY REQUIREMENT MADE)

D13   **How does the** <TITLE> **secure compliance with any requirements for accessible and/or adaptable housing in new housing developments?**

PLEASE SELECT ALL THAT APPLY

Pre-application discussions, so that the requirements form part of the planning application approved	1
Condition(s) on planning permission	2
[IF ENGLAND OR WALES:Section 106 planning obligation][IF SCOTLAND:Section 75 planning obligation]	3
[IF ENGLAND OR WALES:Building Regulations certification][IF SCOTLAND:Building Standards certification]	4
Other (PLEASE SPECIFY)	5
Don't know	6

IF D8 = 1 OR 2 (ANY REQUIREMENT MADE)

D14   **Does the** <TITLE> **have an officer or officers charged with monitoring compliance with proportional requirements for accessible and/or adaptable housing?**

For example[IF ENGLAND OR WALES: Section 106][IF SCOTLAND: Section 75] monitoring officers or planning enforcement officers.

Yes	1
No	2
Don't know	3

IF D8 = 1 OR 2 (ANY REQUIREMENT MADE)

D15 **Over the last three years, how many times has the** <TITLE> **taken either formal or informal action against a developer who did not deliver the required number of accessible and/or adaptable properties to the standard required?**

PLEASE SELECT ONE ONLY

Once	1
2 to 5 times	2
6 to 10 times	3
11 to 20 times	4
More than 20 times	5
None	6
Don't know	7

IF D15 = 1 TO 5 (TAKEN ACTION)

D16 **Please explain what form(s) this action has taken, and whether or not compliance was secured.**

WRITE IN	
Don't know	1

ASK ALL

D17 **Please tell us to what extent you disagree with the following statements, based on your experience of working with housing developers in the** <TITLE>**.**

PLEASE SELECT ONE OPTION PER ROW

	Strongly disagree	Tend to disagree	Neither agree nor disagree	Tend to agree	Strongly agree	Don't Know
_1 Developers tend to find ways around regulations and standards on building accessible homes	1	2	3	4	5	6
_2 Developers are normally fully compliant, and don't seem to have any problems meeting building regulations on accessibility	1	2	3	4	5	6
_3 When it comes to building accessible homes, we try not to impose a lot of regulation on developers, because we don't want to	1	2	3	4	5	6

	Strongly disagree	Tend to disagree	Neither agree nor disagree	Tend to agree	Strongly agree	Don't Know
discourage new development						
_4 It can be difficult to get developers to build accessible homes because they see them as more expensive and less profitable	1	2	3	4	5	6
_5 Developers face too much red tape when it comes to building accessible homes	1	2	3	4	5	6
_6 There is a pressure to maximise land use through density and design	1	2	3	4	5	6

ASK ALL

D18 **In no more than a few sentences, what is the biggest single challenge you face when trying to get developers to build more accessible homes, if any?**

WRITE IN	
Don't know	1

ASK ALL

D19 **We are interested in the impact or potential impact of recent changes to housing policies or laws on the availability and provision of accessible housing. If you were able to make one change to housing policy or law to increase the provision of accessible housing, what would it be?**

WRITE IN	
Don't know	1

E   Housing adaptations

ASK ALL

E1   **How many applications did the** <TITLE>[IF SCOTLAND:**and any NHS boards you work in partnership with] receive for** [IF ENGLAND OR WALES:**Disabled Facilities Grants**][IF SCOTLAND:**help with adaptations to homes for disabled people under the Housing (Scotland) Act 2006 (Scheme of Assistance) Regulations 2008**] **in…**

DS: ALLOW NUMERIC 0 TO 10000 IN EACH BOX

	Number	Don't know
_1 **2015/16**	*WRITE IN*	1
_2 **2014/15**	*WRITE IN*	1
_3 **2013/14**	*WRITE IN*	1

IF E1_1 NUMERIC (KNOW HOW MANY APPLICATIONS MADE IN 2015/16)

E2   **Approximately what percentage of those applications for adaptations made in 2015/16 have been…**

DS: ALLOW 0 TO 100 IN EACH BOX

	Number	Don't know
IF ENGLAND OR WALES:_1 Awarded in full	*WRITE IN*	1
IF ENGLAND OR WALES:_2 Partially awarded	*WRITE IN*	1
IF SCOTLAND:_3 Awarded mandatory grant at 100%	*WRITE IN*	1
IF SCOTLAND:_4 Awarded mandatory grant at 80%	*WRITE IN*	1
_5 Rejected	*WRITE IN*	1
_6 Withdrawn	*WRITE IN*	1
_7 Are still under consideration	*WRITE IN*	1

<div style="border:1px solid">

E2Dum **DUMMY VARIABLE, DO NOT ASK**

Percentage of adaptations accounted for	= E2_1 + E2_2 + E2_3 + E2_4 + E2_5 + E2_6 + E2_7 IF ALL E2_# ASKED = CODE 1, SET TO -1

IF E2DUM > 100, RE-ASK E2, SHOWING: **The figures you gave total to more than 100% of all applications; please could you check if this is correct?**

</div>

IF E2_5 >= 1 OR E2_5 = CODE 1 (DK) (ANY APPLICATIONS REJECTED)

E3 **What were the top five most common grounds for outright or partial refusal of applications?**

PLEASE SELECT UP TO FIVE OPTIONS

Errors made in application process	1
Type of adaptation requested not funded by the <TITLE>	2
Not considered necessary for the individual (possibly based on advice from social services)	3
Not considered appropriate to the individual's needs (possibly based on advice from social services)	4
Not reasonable and/or practicable to fit the adaptation to the property	5
IF SCOTLAND: Didn't fit mandatory grant criteria	6
Unable to secure landlord / leaseholder [IF ENGLAND OR WALES:consent][IF SCOTLAND:co-operation]	7
Cost prohibitive	8
Applicant did not pass means test [IF SCOTLAND:for non-mandatory grant]	9
Other (PLEASE SPECIFY)	10
We didn't reject any applications	11
Don't know	12

IF E1_1 NUMERIC (KNOW HOW MANY APPLICATIONS MADE)

E4 **What was the average waiting time in weeks for decisions on those applications for adaptations made in 2015/16?**

If you're not sure of the exact figure, an approximate answer is fine.

DS: DO NOT ENFORCE NUMERIC RESPONSE

WRITE IN	
Don't know	1

IF E1_1 NUMERIC (KNOW HOW MANY APPLICATIONS MADE)

E5 **What was the average waiting time in weeks from the point of a decision to award a**[IF ENGLAND OR WALES: **Disabled Facilities Grant**][IF SCOTLAND: **grant for an adaptation**] **to installation of the adaptation in 2015/16?**

If you're not sure of the exact figure, an approximate answer is fine.

DS: DO NOT ENFORCE NUMERIC RESPONSE

WRITE IN	
Don't know	1

ASK ALL

E6 **In addition to the assessment carried out by social services, are any of the following people consulted about the assessment for the adaptation?**

PLEASE SELECT ALL THAT APPLY

The applicant	1
Advocate for the applicant	2
Healthcare professionals (e.g. GP, hospital consultant)	3
Family members or carers	4
Private Occupational therapist(s)	5
Other social care professional(s) not part of the social services assessment	6

Local specialist disability organisations	7
National specialist disability organisations	8
Other (PLEASE SPECIFY)	9
Don't know	10

ASK ALL

E7   **What do you see as being the main challenges with respect to administering** [IF ENGLAND OR WALES: **the Disabled Facilities Grant**][IF SCOTLAND:**the provision of adaptations to homes**]**?**

PLEASE SELECT ALL THAT APPLY

Lack of funding compared to demand	1
Difficulty finding reliable sub-contractors and/or long waiting times to secure the services of reliable sub-contractors	2
Applicants struggle to navigate the application process	3
Costs of maintenance of adaptations once installed	4
Lack of capacity to deal with number / backlog of applications	5
Lack of availability of expert advice required	6
Planning permission or building regulations local planning department capacity	7
Limited / poor information about the requirements of the applicant	8
Applicants' requirements change before the process is complete	9
IF SCOTLAND: Relationship between the <TITLE> and NHS Health Boards	10
IF ENGLAND: Issues with the Better Care Fund	11
Other (PLEASE SPECIFY)	12
Don't know	13

ASK ALL

E8   **Is there anything about national policy, law or funding priorities regarding the provision of adaptations in the home to disabled people that you think has impacted on the right of disabled people to live independently?**

WRITE IN	
Don't know	1

F   Tenancy support

We would now like to ask a few questions about tenancy support, provided to tenants in rented housing to help them sustain their tenancy. This could include advice on rent arrears, eviction threats, claiming benefits, repairs, neighbour disputes and budgeting (but not social/personal care).

ASK ALL

F1   **Does your organisation provide tenancy support, either directly or through paying another organisation to do this?**

PLEASE SELECT ONE OPTION ONLY

Yes, directly	1
Yes, we pay another organisation to do this	2
No	3
Don't know	4

ASK ALL

F2   **In your view, are the tenancy support services provided in the** <TITLE>**, whether by your own organisation, by** [IF ENGLAND:**Registered Providers**][IF SCOTLAND OR WALES:**Registered Social Landlords**] **or by any other body able to meet the demand from disabled people for such services?**

PLEASE SELECT ONE OPTION ONLY

Yes, fully	1
Somewhat	2
No, not at all	3
Don't know	4

IF F2 = 2 OR 3 (NOT ALL TENANCY SUPPORT NEEDS MET)

F3 **What would you say are the main barriers which prevent the tenancy support services meeting disabled peoples' needs, if any?**

WRITE IN	
Don't know	1

ASK ALL

F4 **Over the next five years, do you expect the provision of tenancy support in the** <TITLE> **to…**

PLEASE SELECT ONE OPTION ONLY

Improve significantly	1
Improve slightly	2
Not to change	3
Worsen slightly	4
Worsen significantly	5
Don't know	6

IF F2 = 2 OR 3 (NOT ALL TENANCY SUPPORT NEEDS MET)

F5 **Finally, reflecting on any recent or proposed changes to law, national policy or funding priorities in relation to tenancy support, are there any which have impacted on people's ability to maintain a tenancy or live independently, whether negatively or positively?**

WRITE IN	
Don't know	1

G   Close

IF G2 = NULL (LEAD RESPONDENT ONLY)

G1 **Finally, please type in your name, phone number and email address into the boxes below. These will only be used to re-contact you regarding the responses to the survey, if IFF Research or EHRC have any questions.**

DS: DO NOT ALLOW REFUSED.

Name:	*WRITE IN*
Phone number:	*WRITE IN*
Email address:	*WRITE IN*

ASK ALL

G2 [IF G2 = NULL (LEAD RESPONDENT): **If you couldn't answer any of the questions in the survey, and you think a colleague could fill these in, you can forward the survey to them to complete these.**

To do this, just select 'allow another colleague to add responses' below, and click next. Then pause the survey and forward the original research email to your colleague, with an explanation of what you'd like them to do.]

[IF G2 = 1 (SUBSEQUENT RESPONDENT): **Are there any other colleagues of yours who are still to fill in parts of the survey? If you're unsure, please ask your colleague** <LEAD RESPONDENT NAME> **(who should be contactable at** <LEAD RESPONDENT EMAIL> **or on** <LEAD REPSONDENT PHONE>**).**]

Please allow another colleague to add responses after me	1
We've all finished – please submit the results	2

SHOW ALL

G3 **On behalf of IFF Research and the Equality and Human Rights Commission, thank you very much for your time.**

<SHOW SURVEY CONTACT DETAILS>

Contacts

This publication and related equality and human rights resources are available from the Commission's website: www.equlityhumanrights.com.

Questions and comments regarding this publication may be addressed to: correspondence@equalityhumanrights.com. The Commission welcomes your feedback.

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EASS

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Hours	09:00 to 19:00 (Monday to Friday)
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