

The Future of the Independent Living Fund

Community Housing Cymru Group response

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 136,000 homes and related housing services across Wales. In 2010/11, our members directly employed 6,500 people and spent over £800m in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and the Centre for Regeneration Excellence Wales (CREW) in order to jointly champion not-for-profit housing, care and regeneration.

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This document is CHC's response to the questions set out in the DWP's consultation document, 'Future of the Independent Living Fund'.

Question 1

Do you agree with the Government's proposal that the care and support needs of current ILF users should be met within the mainstream care and support system, with funding devolved to local government in England and the devolved administrations in Scotland and Wales? This would mean closure of the ILF in 2015.

There is much evidence to suggest that person-centred approaches to care support better outcomes, facilitate more efficient use of available resources and offer a stronger platform for co-design and co-production of services. It is also logical that devolved administrations should better understand local needs and priorities and would enhance co-design and participation structures. However, there is much concern about:

- the level of funding that would be devolved
- who would administer the funding and resources available to support administration
- continued access to funding for existing recipients
- the protection of existing funds in the face of public expenditure cuts
- the need to ensure that the fund continues to grow in line with inflation and evidence of growing demand.

These issues need to be addressed before any decisions are made about devolved/regional funding.

Question 2

What are the key challenges that ILF users would face in moving from joint ILF/Local Authority to sole Local Authority funding of their care and support needs? How can any impacts be mitigated?

There is a significant risk that not all users who currently receive funding will be deemed eligible with the move to sole Local Authority funding. There are already inconsistencies between Local Authorities' assessments of care and support needs and budget pressures may mean that fewer people will be deemed eligible for support. Also, if there is no current relationship with the Local Authority and little experience of the mainstream care and support system, then these individuals may struggle to access funding.

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Therefore, we would encourage DWP and Welsh Government to consider a Local Authority / third sector partnership administrative body as the ideal vehicle for future funding delivery in Wales.

A regional consortia body could help reduce back office overheads and would also widen access to the fund and ensure that future fund recipients are not just those with an existing relationship with the Local Authority. Third sector partners such as housing providers and Care & Repair agencies will also be able to promote the fund to the most vulnerable groups and add value to the new fund by directing and allocating resources appropriately.

Question 3

What impact would the closure of the ILF have on Local Authorities and the provision of care and support services more widely? How could any impacts be mitigated?

The closure of the ILF could have significant resource implications for Local Authorities who will have a duty to assess the care and support needs of all current users, including 16,309 disabled Group 2 users jointly funded by local authorities, 1,737 Group 1 users receiving some local authority care and support and ILF users who do not currently have a relationship with their local authority. This is in addition to new applicants which are expected to increase significantly in the future. Local Authorities are also facing funding cuts and are under considerable funding pressures which could lead to pooling funds. It is therefore really important that if funding is transferred to Local Authorities, it is ring-fenced.

Question 4

What are the specific challenges in relation to Group 1 users? How can the Government ensure that this group are able to access the full range of Local Authority care and support services for which they are eligible?

We know that the closure of the ILF would be more difficult for those Group 1 users who are not currently receiving any Local Authority funding, and who in some cases have little experience of the mainstream care and support system. It is important that those users engage with the local authority care and support services for which they are eligible.

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Question 5

How can DWP, the ILF and Local Authorities best continue to work with ILF users between now and 2015? How can the ILF best work with individual Local Authorities if the decision to close the ILF is taken?

If the ILF fund closes in 2015, DWP will need to start work immediately with Welsh Government, third sector organisations (including housing associations), other stakeholders and service recipients to ensure a smooth transition and that there are sufficient resources available and intelligence to continue the administration of the grant at regional levels. An evaluation of the effects of transfer will be important and consideration should also be given to a transition period.

Conclusions

The Independent Living Fund has played a key role in facilitating the provision of care and support across the UK and is highly valued by fund recipients. Therefore, it is important that any changes proposed are fully consulted upon and take into consideration the needs and requirements of existing and potential recipients, as well as wider government objectives around the need for consistency and one integrated care system.

**Community Housing Cymru Group
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