

Introduction

There are 16 million Disabled people in the UK, and we make up a fifth of the population. We are not a homogeneous group: we have different impairments, are different genders and sexual orientations, come from different backgrounds, live different lives and have different housing needs.

Access for all to adequate, safe and affordable housing by 2030 is a UN Sustainable Development Goal, and our right to housing for independent living is outlined clearly in the Convention on The Rights Of Persons With Disabilities (CRPD).¹ Yet, the housing system in England has been consistently failing Deaf and Disabled people for years. For over a decade, little action has been taken to address this crisis.

The state of housing for Disabled people in England

Whether we rent socially, privately or own our homes, Disabled people are more likely to have unmet housing needs. According to the Equality and Human Rights Commission (EHRC), one in five Disabled people in social rented homes and one in three in private rented homes live in unsuitable accommodation.² Research by Inclusion London found that 1 in 4 Disabled Londoners with housing access requirements live in completely inaccessible homes, homes where they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways.

The role of the Disabled Facilities Grant and barriers to accessing adaptations

The Disabled Facilities Grant (DFG) is a vital tool for improving the accessibility of existing homes. A well-functioning DFG system would help address the high demand for accessible housing, especially in areas with the greatest need. _It would also support local authorities to better plan for Disabled people's housing needs by allowing them to assess, map and

¹ UN, <https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-crpd>

² EHRC (2018), <https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-britains-hidden-crisis>

improve the accessibility of the housing stock that already exists, complementing plans for future housing developments.

However, in its current form, the DFG system is failing. It is outdated, inconsistent, and inaccessible to many. It has effectively become a postcode lottery. An investigation by Vicky Gale found that in nine council areas across England and Wales, Disabled people had to wait on average more than a year to see an occupational therapist and complete the pre-application steps. In Southend, for example, the wait exceeded 18 months.³

The Equality and Human Rights 'Housing and Disability' report found that 10% of local authorities in England took over 6 months to deliver adaptations once approval had been given.⁴ These delays have a devastating impact on the lives of Disabled people, leaving us without the adaptations we need to live safely and independently in our own homes.

Supporting Disabled children and families

We support the principle of adjusting the DFG funding formula to better reflect the needs of Disabled children. Almost a third (30%) of families with a disabled child live in a home that does not meet the needs of their child. Of those, 48% say their home worsens their child's condition or puts them at risk, 43% report a need for adaptations⁵.

It should be noted that Disabled children will continue to age and grow through their adaptations, requiring more adjustments over time. This process highlights the need for a responsive and agile assessment and allocation system for the grant.

Rising costs and local authority support

We support the proposal to adjust the formula to account for regional variations in build costs. Currently, 80% of local authorities in England and Wales are using discretionary powers to top up DFG funding, with extreme inconsistencies.

³ The Bureau of Investigative Journalism, (2022), <https://www.thebureauinvestigates.com/stories/2022-04-05/disabled-people-trapped-waiting-years-for-vital-home-adaptations>

⁴ **Equality and Human Rights Commission, (2023), *Housing and Disabled People: Britain's Hidden Crisis***, https://www.equalityhumanrights.com/sites/default/files/2023/housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf

⁵ <https://contact.org.uk/about-contact/news-and-views/almost-1-3-families-with-disabled-children-live-in-unsuitable-homes/>

Some councils offer up to £30,000 in additional support. Manchester offers up to £70,000. In some areas, top-ups are provided as grants, in others as loans. This inconsistency makes it incredibly difficult for Disabled people to feel confident to take the process forward, waiting years for changes to be made, and many are left without the adaptations they need to live safely in their own homes.

With building costs projected to rise by 15% over the next five years, we believe the formula should be updated at least twice a year to reflect the current volatile nature of our economy and ensure Disabled people are not left behind.

⁶.

The importance of data on the accessibility of the housing stock

The reconsideration of the DFG formula presents the government with a significant opportunity to encourage local authorities to assess and report local need for accessible housing. As of 2024, just 21% of local authorities had an accessible housing register.⁷ Without a good understanding and assessment of Disabled people's housing needs locally, planning for accessible housing is fundamentally flawed.

The formula would be greatly enhanced if all local authorities were required to report the accessibility of their housing stock, specifically the number of existing and new build M4(1), M4(2) and M4(3) homes across all rented tenure types.

We know that local areas with higher proportions of M4(2) and M4(3) homes are likely to have lower DFG demand and require less funding to achieve higher accessibility standards, as these homes are easier and cheaper to adapt. Habinteg's 2024 price comparison found that adapting an M4(1)

⁶ <https://bcis.co.uk/news/bcis-construction-industry-forecast/>

⁷ <https://committees.parliament.uk/publications/45020/documents/223326/default/>

home to include a grab rail, stair lift, and wet room can cost up to £27,000 more than making the same adaptations to an M4(2) home.⁸

We believe the government would be making a serious error by not using the new formula consultation to require much better reporting practices from local authorities. The DFG formula should be weighted in the future to direct more funding to areas with lower accessibility stock.

We are concerned that calculating the number of 'disabled people' based solely on DWP data of social security claimants may not be the most accurate approach. For instance, it may show disproportionately higher numbers of Disabled people who do not require adaptations to support independent living. We are also concerned that due to systemic barriers to accessing social security, some Disabled people from ethnic minority backgrounds may be under-counted. We know that Disabled people from an Asian/Asian British background were less likely to receive PIP compared to those from a White background.

We strongly support the Levelling Up, Housing and Communities Committee's recommendation from 2024 to the Ministry of Housing, Communities and Local Government, suggesting that: "The Department [Ministry of Housing, Communities & Local Government] must require local authorities to report on the supply of new homes at [a] M4(2) standard and [b] M4(3) standard specifically in their annual data submission to the Department. The Department must publish this data annually as part of the 'Housing supply: net additional dwellings' statistical release."

We recommend that local authorities be required to report on:

- The accessibility of existing housing stock,
- Net housing starts and completions by accessibility category (M4(1), M4(2), M4(3)) and by tenure

Beyond the formula: awareness and support with DFG application process

Fixing the DFG formula is necessary, but not sufficient. Much more must be done to improve awareness and support for Disabled people applying for DFG, especially in the private rented sector. The EHRC's Housing and Disability report highlighted that private tenants face greater barriers to

⁸ Habinteg, (2024), <https://www.habinteg.org.uk/latest-news/adaptations-to-older-homes-could-cost-households-thousands-habinteg-2478/>

getting adaptations approved and were much less likely to be aware of support and advice regarding adaptations than homeowners or social housing tenants.

Barriers included lack of knowledge from the landlord and tenant about the DFG process and confusion over who is responsible for maintaining the adaptation.⁹

Similarly, when Inclusion London interviewed local authorities about supporting Disabled private renters with DFG applications, council responses included:

“[I don’t think] we even necessarily see the applications because I don’t think residents would even think they could ask, because they know what the answer would be. It’s so precarious to try and ask for anything from your landlord at moment.”

“ They [landlords] can get their houses rented like that [click]. I think the funding is available in theory, a limited pot, but the actual management of that is...”

These quotes highlight just how inaccessible and intimidating the process is for many Disabled private renters needing adaptations. There is a clear need for better communication, guidance, and enforcement to increase uptake of DFG in the PRS.

Transforming Disabled Facilities Grant – Transforming lives

The Disabled Facilities Grant has the potential to transform the lives of Disabled people living in inaccessible homes. However, in its current form it is not meeting that potential, and Disabled people are too often left facing delays, costly adaptations they cannot afford, and confusion about the application process.

We fundamentally support the proposals to:

⁹ Equality and Human Rights Commission, (2023), *Housing and Disabled People: Britain’s Hidden Crisis*, https://www.equalityhumanrights.com/sites/default/files/2023/housing-and-disabled-people-britains-hidden-crisis-main-report_0.pdf

- Adjust the DFG formula to better reflect the needs of Disabled children
- Account for regional variations in building costs

We also believe that reform of the DFG formula provides an opportunity to require local authorities to collect and publish robust data on the accessibility of housing stock, including the number of homes built to M4(1), M4(2) and M4(3) standards, so that funding is properly targeted to areas with the greatest need.

Changes to the DFG formula are welcome and necessary to improve the fairness of how DFG is allocated. But fixing the formula alone will not be enough. The DFG application process itself must be improved through clearer guidance for applicants and landlords, particularly in the private rented sector where uptake of grants remains far too low.

With these reforms, the DFG could become a cornerstone of accessible housing, helping to deliver on Disabled people's right to live safely, independently and with dignity in their own homes. Without them, the system will remain a postcode lottery that fails to meet the scale of need.

About us

Inclusion London

Inclusion London's mission is to promote Deaf and Disabled people's equality and inclusion by supporting Deaf and Disabled People's Organisations (DDPOs) and campaigning for rights for Deaf and Disabled people across the UK.

Disability Rights UK (DR UK)

We are a national organisation led by Disabled people. Our vision is a world where Disabled people have equal rights, opportunities, and access to power. Our work is rooted in the lived experience of Disabled people. We are a membership organisation and work closely with organisations led by Disabled people across the UK.