

Housing Assistance Policy 2016 - 2018



Lichfield District Council

Housing Assistance Policy 2016 – 2018

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1. Introduction

Ensuring that homes are decent, safe and secure is not only important for the health and wellbeing of the occupants but it is also vital for the sustainability of communities. Many residents have the necessary resources to maintain and repair their own homes; however some may need some assistance to do this, especially those that are on a low income, have disabilities or older people.

The purpose of this policy is to set out how Lichfield District Council will provide assistance in the private sector and implement a range of schemes to make best use of limited council resources to raise housing standards in the District and also work with partners to improve the quality of housing available to residents.

2. Strategic context

This policy and its priorities have been developed to reflect national, sub-regional and local strategies in the context of local issues.

2.1. National Context

The government's view is that the primary responsibility for maintaining privately owned properties rests with the homeowner. However, in certain circumstances it may become necessary for some assistance in the form of a grant or loan to be made available to assist in carrying out essential repairs or improvements.

The Regulatory Reform (Housing Assistance) England and Wales Order 2002 (RRO 2002) gave local authorities a general power to provide financial or other assistance for home repair and improvements where home owners needed it. Essentially, the order moved local authority focus away from the previous grants delivery process which was tightly controlled by legislation, and replaced it with a general power that gives more freedom and provides more opportunity for local authorities to apply policies that best suit local needs, conditions and resources.

The Decent Homes Standard¹ was amended in 2006 to reflect the Housing Health and Safety Rating System (HHSRS) that was introduced by the Housing Act 2004. To be 'decent' a dwelling must be free from category 1 hazards, and in determining this the HHSRS is a risk assessment procedure that allows local authorities to intervene where they consider housing conditions to be unacceptable on the basis of the impact of hazards on the health or safety of the most vulnerable occupant.

The Home Energy Conservation Act (HECA) 1995 sets out how local authorities have a role to play in improving the energy efficiency of the residential accommodation in their areas, and thereby achieving reductions in domestic carbon emissions. From March 2013 local authorities are required to produce reports by setting out the energy conservation measures that the authority considers practicable, cost-effective and likely to result in significant

¹ A Decent Home is defined under the Housing Health and Safety Rating System as one that has no Category 1 hazards, is in a reasonable state of repair, has reasonably modern facilities and services and provides a reasonable degree of thermal comfort. A Decent Home: Definition and guidance for implementation - June 2006 update.

improvement in the energy efficiency of residential accommodation in the district.

The council's first Housing Assistance Policy was developed using the powers of the RRO 2002. In 2011, following changes to funding for private sector renewal, the policy was amended to reflect changes in the schemes available to assist residents.

In June 2013 the £5.3bn Better Care Fund (BCF) was announced by the government, to ensure a transformation in integrated health and social care. It creates a local, single pooled budget to incentivise the NHS and local government to work more closely together around people, placing their wellbeing as the focus of health and care services, and shifting resources into social care and community services for the benefit of the people, communities and health and care systems. From April 2015, government funding for Disabled Facilities Grants (DFG's) is no longer provided direct to District and Borough Councils in the form of a grant but is instead allocated through the BCF hosted by Staffordshire County Council. The statutory duty to deliver DFG's however remains with District and Borough Councils.

2.2. Sub-Regional Context

Previously, District and Borough Councils across Staffordshire contracted with Home Improvement Agencies (HIA's) individually to deliver home improvements for their residents. Until 30th September 2014 DFG's and Home Repair Assistance (HRA) grants were delivered on behalf of Lichfield District Council by Metropolitan Support Trust (formerly Metropolitan Care and Repair) HIA via a service level agreement.

Working in partnership with all eight District and Borough councils of Staffordshire, Staffordshire County Council have sought to further improve home improvement services for residents and manage the increasing demand for grant aid across the county and it was therefore agreed that it would be beneficial to commission home improvement services across Staffordshire under a single contract.

From 1st October 2014 Revival HIA (part of Staffordshire Housing Group) was appointed to deliver home improvements across the whole of Staffordshire until 31st March 2017 with an option of a one year extension. Through a Participation Agreement to the county contract, Revival now deliver the DFG and HRA grant administration and oversee works on behalf of Lichfield District Council. This policy has been refreshed to reflect these changes and also outline some additional services available to residents of Lichfield District.

2.3. Local context

Lichfield District does not suffer from large scale areas of housing disrepair, and properties that are empty or in poor repair tend to be dispersed around the district. A comprehensive review of current stock conditions was conducted in 2010 by consultants CPC who carried out a private sector stock condition survey². Key findings were that local levels of non-decent homes

² This available at http://www.lichfielddc.gov.uk/site/scripts/download_info.php?downloadID=1318

were approximately 19.9% which is below the national average of 35.8%, and is mostly associated with older properties.

At 39%, non-decency rates in the private rented sector were found to be higher in comparison to the rest of the stock; however it is worth noting that the private rented stock in the district is relatively small. Burntwood has the highest overall rate of non-decent homes at 24.7% of stock, with rural areas having the second highest at 19.9% and Lichfield City having the lowest overall rate at 16.2%.

Overall it was estimated that 17.5% of vulnerable households in Lichfield District live in a non-decent home, which is approximately 990 households. Of these it was estimated that 530 are owner occupiers and 460 live in private rented accommodation. These figures translate into 11.4% of vulnerable households that own their own home live in a non-decent home; whereas 46% of vulnerable households who live in private rented accommodation live in a non-decent home.

The stock condition survey also identified that the housing stock in the district has an average SAP³ rating of 57 which is higher than the national average of 48. However, this varies considerably across different tenures and property types, with pre-1919 properties showing the lowest ratings of 42 and the average in the private rented sector being 52. From this information it has been estimated that 2,660 households in the district are in fuel poverty⁴.

A new stock condition survey is due for completion in 2017 after which we will be able to update this information.

2.4. Links to corporate objectives and strategies

The Housing Assistance policy forms a key part of the council's Housing Strategy and has links to other corporate priorities.

To "ensure warm, healthy well maintained homes, reduce fuel poverty and cut carbon emissions" is one of the priorities of the Housing Strategy 2013-17. The link between housing and health means that housing has a key role to play in the council's mission to improve the quality of life of all of its residents and will have a major input into the council's ability to meet 'Our Strategic Plan 2016 - 2020' particularly within the themes of 'healthy & safe communities' and 'clean, green and welcoming places to live'.

The relationship between health and housing is well documented and the environment we live in can be an important influence on health and wellbeing and the demand for health and social care. Certain characteristics, such as trip hazards, overcrowding, sanitation and poor heating can have adverse effects on an individual's health.

³ SAP is the Standard Assessment Procedure and is the government's standard method of calculating the energy efficiency of homes and is used to provide a home energy rating.

⁴ Fuel Poverty is generally accepted as being a household who need to spend more than 10% of their income to heat their home to a temperature needed to maintain health and comfort.

3. Principles of Assistance

- The council recognises that the primary responsibility for repairing and maintaining a property rests with the owner⁵. However the council has certain statutory responsibilities to fulfil and must also take steps to protect and assist vulnerable members of the community whilst providing advice to all residents to help them maintain their own homes and utilise government funding where appropriate.
- Everyone lawfully resident in Lichfield District should have access to a decent home⁶.
- Through the Home Improvement Agency we will provide advice and practical support to actively find solutions and financial assistance to enable residents to maintain and repair their homes. However, we realise that this may not always be appropriate and where necessary we will work with our public sector and social landlord partners to offer alternative solutions.
- Approval for funding, from whatever source, will not be given if the application for assistance is made after the eligible works have been completed.
- The provision of financial assistance is subject to the availability of funding and the support and assistance we provide should encourage private investment and maximise the impact of available public funds.
- Eligibility for all types of assistance in this policy is subject to change due to funding levels and any alterations will be made with the agreement of the Cabinet Member for Housing and Health and will be published on the council's website.

3.1. How assistance is delivered

3.1.1. The Home Improvement Agency

The Home Improvement Agency Service in Staffordshire is delivered by Revival (part of the Staffordshire Housing Group), who provide a number of services for residents of the District. The service is commissioned to provide advice and support, whether over the phone or in the person's home, to help them to continue to live independently by helping with disabled adaptations, advice around housing options, repairs or home improvements.

In order to achieve the council's aim to ensure an efficient service for applicants for DFG's and particularly to ensure minimal waiting times, using the powers available under the RRO 2002 the council has continued to delegate the power to approve and pay all grants for adaptations to the HIA through a service agreement under the county contract.

The agreement sets out the working arrangements and provisions for the council's monitoring and audit requirements, as whilst the HIA delivers the service, the council retains an audit role and receives regular monitoring reports on performance. The agreement, together with the cost of the service

⁵ Owner includes owner occupier and private landlords

⁶ Decent means must meet the Decent Homes Standard.

to the council is reviewed in line with the county contract, or as and when there are material changes in demand or with the availability of funding.

4. Types of Assistance

The following assistance measures are currently available. Following assessments of need and resources available new initiatives may be developed and added in the future.

- Assistance for disabled persons -Disabled Facilities Grants(DFG's)
- DFG Top-up
- Emergency home repair assistance
- Home loan and equity release schemes
- Energy efficiency schemes
- Target hardening for victims of crime and vulnerable residents
- Empty home assistance

4.1. Disabled Facilities Grants

DFG's are grants that enable adaptations to be done to a disabled person's home to allow them to continue to live there, or be cared for there as laid out in the Housing, Grants, Construction and Regeneration Act 1996, its accompanying regulations and subsequent amendments.

Eligibility:

- Assistance is available to people who have, or propose to acquire, an owners interest in every parcel of land on which the relevant works are to be carried out or who is the tenant (alone or jointly with others) of the dwelling
- The grant is means tested. Applications for disabled children under the age of 19 are exempt from the means test
- The funding is available for adaptation work which is offered in accordance with the criteria set out in Appendix A
- The maximum grant payable is £30,000
- The proposed works are required to meet one or more of the identified needs of the disabled occupant as set out in Appendix A

Assistance conditions which any application must meet:

- All architects drawings, specifications and schedules for works must be completed in accordance with the standard specification agreed by the council, detailed in Appendix B
- All applications for funding will be determined by the HIA, and will be assessed against the eligibility criteria detailed in Appendix A. Any fee charged for this service is grant eligible.
- All applications will be approved within six months of a valid application being made; and all works must be completed within 12 months of the date of that approval or the grant will expire. Under exceptional circumstances an extension may be applied for; the maximum extension which will be granted will be 3 months.

- Applications may be approved on terms that payment of the grant, or part of it, will not be made before a date specified in the notification of the decision on the application; this date shall not be more than 12 months after the date of application.
- Full grant conditions can be found in Appendix A

For the statutory means test the disabled person's financial resources are assessed to determine if they can contribute towards the cost of the works and the grant is calculated as the total cost of the eligible work including fees, less any calculated contribution, subject to the maximum grant limit.

Due to limited funding and the demand for assistance, a waiting list may be operated of duly made applications. Priority may be applied as detailed in Appendix A.

4.2. Disabled Facilities Grants Top-Up

This is a discretionary grant which may be available to applicants where the eligible cost of works exceeds £30,000. This top-up funding will only be available in exceptional circumstances where all other funding possibilities have been exhausted and will be authorised on an individual basis by the Cabinet Member for Housing and Health.

The maximum amount of funding available under this grant is £5,000 and the grant cannot be used to fund a client's assessed contribution towards the works. Where an award of DFG Top-Up is made, the recipient will be required to repay the award in full in line with the conditions laid out in Appendix A.

4.3. Emergency Home Repair Assistance

This grant ensures that the most vulnerable households living in the worst conditions receive help to enable them to remain in their homes. Grants are delivered on the council's behalf by the HIA. The assistance is available to owner-occupiers as follows:

- The maximum grant is £5000 and is available to households who do not, or are unlikely to, qualify for any assistance through an equity-release product, or where the works are considered prejudicial to health or dangerous were they to be delayed by the waiting times involved in a loan application.
- Eligibility criteria and eligible works are detailed in Appendix C
- Applications for assistance will be given priority in accordance with the eligibility criteria set out in Appendix C. The level of priority required to receive a grant will be dependent upon the availability of funding throughout the year; this will be reviewed on a periodic basis.
- Any grant awarded will be registered as a land charge against the property for a period of 10 years, and repayment will be required in line with the conditions laid out in Appendix C.

4.4. Home Loan and Equity Release schemes

Step Change – Financial Solutions

Revival offer an equity release scheme in partnership with StepChange which allows older home owners to unlock finance to fund home improvements and repairs. StepChange provide a no-obligation advice service on equity release (as well as debt advice and other types of loans) for all residents. If a resident meets the qualifying criteria, Revival can help them to apply for equity release or other funding such as charitable loans and grants to fund home improvements or repairs. The aim is to help older people to remain safely and independently in their own homes, helping to prevent poor health and reducing the need for residential care. Equity release may involve a lifetime mortgage or home reversion plan and a personalised illustration will outline the features and risk associated with the scheme. For more detailed information on the equity release scheme, contact Revival Home Improvement Agency whose details are listed in section 5.

4.5. Energy Efficiency

The council has set out priorities for action in the Housing Strategy 2013-2017 and the Housing Strategy Delivery Plan details the actions we aim to complete to support a reduction in the percentage of people living in fuel poverty, increase the energy efficiency of the housing stock and cut carbon emissions.

The council produced the HECA Report in March 2015, which includes the projects and activities that we will council will undertake and facilitate in the next few years. The council will consider areas to target through the HECA report and has committed to participate in initiatives such as the Energy Company Obligation (ECO) and emerging opportunities which may arrive to replace the government's recently terminated Green Deal scheme.

4.5.1. Warmer Homes Greener District

The council's energy efficiency initiative Warmer Homes, Greener District (WHGD) was established in 2007 with the aim of reducing the use of energy in the home and reducing fuel poverty among homeowners. It also aims to add value and increase inward investment in Lichfield through optimising the use of Energy Company Obligation funding opportunities and grants that may be available from energy suppliers.

Householders can call the WHGD energy advice line on 0800 677 1543 which is run on behalf of the council by Marches Energy Agency and Beat the Cold and speak to trained advisors about energy efficiency and reducing their fuel bills.

Discretionary grant support from the council is only available to residents that require emergency assistance in accordance with the Emergency Home repair Assistance criteria set out in in Appendix C.

4.6. Target Hardening

The council's Homelessness Prevention and Assistance Policy⁷ (revised 2015) details a further type of housing assistance in the form of a target hardening scheme. The aim of the scheme is the prevention of homelessness by ensuring that by the addition of appropriate security measures survivors of domestic abuse and other violent crimes are able to remain in their homes, feeling safe and secure in doing so. The scheme will allow the installation of security measures free of charge to eligible applicants up to a maximum of £2500. Full details can be found in Appendix C of the Homelessness Prevention and Assistance Policy on the council's website.

4.7. Empty Homes

The Empty Homes Policy 2016⁸ was developed to try and reduce the number of long term empty homes in the district. Local authorities have a number of legal powers to ensure that empty homes are brought back into use, however there is no statutory duty to do so. We have limited resources and will prioritise action depending on the associated risks and severity of the impact that the home is having on those affected by it. In offering assistance to empty home owners, the council will seek to work with owners to identify the range of options available to them. This may include practical guidance on:

- Letting/leasing/custodian schemes
- Property valuation
- Building regulations and planning

5. Enquiries, advice and assistance

5.1 Contacts

For DFG's for adults in the first instance you should contact:

Staffordshire Cares

Staffordshire County Council
Number 1 Staffordshire Place,
Stafford
ST16 2LP
Telephone: 0300 111 8010

⁷ <https://www.lichfielddc.gov.uk/Council/Live-meetings/Downloads/Cabinet-member-decisions/Homelessness-Prevention-Report-Signed-approval-June-2015.pdf>

⁸ <https://www.lichfielddc.gov.uk/Residents/Housing/Housing-strategy/Empty-properties.aspx>

For DFG's for children with disabilities contact:

First Response Team

Children and Lifelong Learning
Wedgewood Building
Tipping Street
Stafford
ST16 2 DH

Freephone: 0800 1313 126 (Monday to Thursday, 8:30am-5:00pm and Friday 8:30am-4:30pm)

Email: firstr@staffordshire.gov.uk

Enquiries regarding grant aid for disabled persons or home repairs assistance (HRA) can be made to:

Revival Home Improvement Agency

308 London Road
Stoke-on-Trent
Staffordshire
ST4 5AB

Telephone: 0333 014 3389

Fax: 01782 745829

By email to: revival@staffshousing.org.uk

Revival are open Monday to Friday, from 8.30am-5.30pm.

The Trader Register

For residents who are funding their own work and would like information on reliable contractors registered with SCC there is a trader register.

For more information contact:

Staffordshire & Stoke-on-Trent Trader Register

Staffordshire County Council
20 Sidmouth Avenue
Newcastle-Under-Lyme
ST5 0QN

Telephone: 01785 330888 (Telephone lines are open between 8am – 8pm Monday to Thursday; 8am – 6pm Friday and 9am – 5pm Saturday)

Website: www.traderregister.org.uk

Appendix A – Disabled Facilities Grants

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1. Priority Assessment

All applicants for Disabled Facilities Grants (DFG's) are required to have an assessment carried out by a qualified Occupational Therapist (OT), usually from Staffordshire and Stoke on Trent Partnership Trust or Staffordshire County Council's Independent Futures team. This assessment will be expected to include the assessment that the relevant works are necessary and appropriate to meet the needs of the disabled occupant.

Following the assessment, if it is decided that an adaptation is needed, the OT will complete a 641-referral form and send it to the council's nominated partner Home Improvement Agency which is currently Revival.

As part of the assessment the disabled person will be allocated into one of the following priority bands:

Priority 1: where there is an identified risk which may result in danger or harm, or where discharge from hospital is dependent on adaptations being done.

Priority 2: where there is a long term risk of deterioration, which would result in risk of harm.

Priority 3: where the resident has an essential need which if met could improve their quality of life.

Applicants may be reviewed by an OT every six months following which their banding may change to reflect any changing circumstances.

2. Eligibility Criteria

In assessing eligibility, the council or its nominated HIA delivery partner will have regard to whether the proposed works listed in section 3 a-n below are required to meet one or more of the needs of the disabled person.

The words and terms used below shall have the same meaning as defined in the Housing Grants, Construction and Regeneration Act 1996.

The eligibility criteria for Disabled Facilities Grants are as follows:

- i. The applicant has, or proposes to acquire, an owners interest in every parcel of land on which the relevant works are to be carried out

or

- ii. The applicant is a tenant (alone or jointly with others) of the dwelling or of a flat in the building in the case of works to the common parts.
- iii. The disabled occupant intends to live in the dwelling or flat as his only or main residence for a minimum period of 5 years from the date of application.

- iv. The proposed works are required to meet one or more of the following identified needs of the disabled occupant:

The purposes, for which an application for disabled facilities grant must be approved, are the following—

- a. facilitating access by the disabled occupant to and from the dwelling or the building in which the dwelling, qualifying houseboat or qualifying park home or, as the case may be, flat is situated.
- b. making the dwelling, qualifying houseboat or qualifying park home, or the building, safe for the disabled occupant and other persons residing with them;
- c. facilitating access by the disabled occupant to a room used or usable as the principal family room;
- d. facilitating access by the disabled occupant to, or providing for the disabled occupant, a room used or usable for sleeping;
- e. facilitating access by the disabled occupant to, or providing for the disabled occupant, a room in which there is a lavatory, or facilitating the use by the disabled occupant of such a facility;
- f. facilitating access by the disabled occupant to, or providing for the disabled occupant, a room in which there is a bath or shower (or both), or facilitating the use by the disabled occupant of such a facility;
- g. facilitating access by the disabled occupant to, or providing for the disabled occupant, a room in which there is a wash hand basin, or facilitating the use by the disabled occupant of such a facility;
- h. facilitating the preparation and cooking of food by the disabled occupant;
- i. improving any heating system in the dwelling, qualifying houseboat or qualifying park home to meet the needs of the disabled occupant or, if there is no existing heating system or any such system is unsuitable for use by the disabled occupant, providing a heating system suitable to meet their needs;
- j. facilitating the use by the disabled occupant of a source of power, light or heat by altering the position of one or more means of access to or control of that source or by providing additional means of control;
- k. facilitating access and movement by the disabled occupant around the dwelling, qualifying houseboat or qualifying park home in order to enable them to care for a person who is normally resident there and is in need of such care;
- l. facilitating access to and from a garden by a disabled occupant or making access to a garden safe for a disabled occupant.
- m. facilitating the disabled person to acquire suitable alternative living accommodation, where it is not reasonable and/or practicable to adapt their existing accommodation to meet their assessed needs.

- n. such other purposes as may be specified by order of the Secretary of State.

3. Test of Financial Resources

The DFG payable will be subject to a test of the financial resources of the disabled occupant. This is in accordance with the Housing Grants, Construction and Regeneration Act 1996 with the assessment being carried out by an authorised officer of the HIA.

4. Necessary and Appropriate

Only works that are **necessary** and **appropriate** to meet the needs of the disabled person as identified in the 641-referral form completed by the OT, will be eligible for Disabled Facilities Grant funding.

The outcome of the assessment made which demonstrates the works that are necessary and appropriate to meet the needs of the disabled person shall be recorded and maintained as supporting evidence of the assessment by the HIA.

To assist in this assessment it will be a requirement that confirmation in writing is obtained from the OT that the proposed works as detailed in the schedule of works and plans (if any) are necessary and appropriate to meet all of the assessed needs of the applicant both now and in the future.

The assessment of the disabled person's needs will have regard to the potential for using equipment, making minor amendments to the home and other solutions such as moving to more suitable accommodation, before determining that a DFG funded major adaptation is the necessary and appropriate solution. Where an applicant is registered on the housing register then this must be determined prior to an application for a DFG being made.

5. Reasonable and Practicable

In designing adaptations to meet the needs of a disabled person and to be eligible for a DFG, there are a number of sequential assessments that need to be undertaken in order to determine whether the proposed works are both **reasonable** and **practicable** to deliver. This assessment must be undertaken by the authorised officer of the HIA.

These are as follows:

The reasonableness and practicalities of the proposed work having regard to

- i. The layout, construction age and condition of the accommodation
- ii. The number, ages and needs of the other occupants of the accommodation
- iii. The use of the accommodation by the disabled person and any other occupants
- iv. The location of the accommodation e.g steep access to the property.
- v. Any other options that have been considered less practicable than the proposed work

- vi. The cost of the proposed work is assessed as reasonable having regard to the likely cost of any alternatives.
- vii. Successful adaptations carried out in similar types of accommodation.
- viii. The implications of carrying out the required adaptation with regard to its future use and classification and potential hardship issues, particularly with regard to spare room subsidy.

The assessment will be done to determine that the proposed works are reasonable and practicable and shall be recorded and maintained as evidence of assessment by the HIA.

6. Application Forms and other details required

The following application forms and details are required for an application to be considered a valid application:

- a. Application form
- b. Future occupation certificate
- c. An owners certificate
- d. Confirmation of ownership
- e. Permission of the owner
- f. Proof of financial information
- g. A schedule of work to be carried out
- h. A minimum of 2 quotes for the cost of works from contractors preferably on the approved list of contractors held by the HIA.
- i. Estimates of any fees that are being claimed. In the case of HIA fees these shall be calculated in accordance with the relevant contract.
- j. A completed referral from a suitable qualified person.
- k. An assessment that the proposed works are necessary and appropriate to meet the needs of the disabled person.
- l. An assessment that the proposed works are reasonable and practicable to deliver.

7. Waiting Lists

Where insufficient funds are available to approve a DFG then cases will be held on a waiting list for a maximum of 6 months from the date of application. The waiting list criteria will be based around 2 priorities:

- a. Priority of case at the time of application awarded by the OT
- b. Date of application

8. Approval of Disabled Facilities Grants

In order to approve a valid application and determine the level of funding the following actions will be carried out and recorded by the authorised officer of the HIA and those details recorded along with the date they were carried out.

- a. Certify that the application forms have been correctly and fully completed.
- b. Certify that the applicant has the required interest in the accommodation to be adapted and is therefore eligible to make an application. Where the applicant is a prospective owner or tenant the application cannot be approved.
- c. The applicant's contribution towards the cost of the works was calculated in accordance with the Housing Renewal Regulations 1996 as amended.
- d. That the proof of financial information provided matches that used to calculate the applicant's contribution in c) above.
- e. That the estimates have been obtained in accordance with the financial regulations of the council or its partner HIA provider or in the case of specialist equipment (e.g. stair lifts) that the estimated cost has been obtained in accordance with Staffordshire County Council financial regulations. That the estimates are not from members of the client's family.
- f. That the lowest estimate(s) for the works is/are identified and that a check is carried out that all of the works required by the specification and plans (if any) are included in all the estimate(s). All estimates should be itemised and individual costs should be added up to check if the total is correct. Where VAT is being charged a check shall be made that this is correct as most adaptations are free of VAT.
- g. That the works have not already begun.
- h. That any estimates for fees are eligible for grant assistance and are reasonable. Eligible fees include fees for the use of the HIA services as detailed in the appropriate contract, the reasonable cost of obtaining plans and any necessary permissions, the cost of obtaining any certification required (e.g. details of ownership) and funding. Reasonable cost will be determined having regard to competitive estimates being obtained or otherwise in compliance with the financial regulations of the HIA.
- i. Where it has not been possible to certify that the application forms have been completed satisfactorily or the information required by this policy has not been met, the documentation will be returned to the applicant as an incomplete application.
- j. The eligible expense is calculated by adding together the total estimated cost and the total cost of fees, subject to a maximum grant of £30,000.
- k. The actual amount of grant is calculated by deducting the applicant's contribution (calculated in 'c' above) from the eligible expense (calculated in 'j' above).
- l. That sufficient funds will be available to enable the payment of the grant having regard to the funding available.

- m. A second certification shall be made that all of the forms, details and checks and calculations have been correctly carried out by a senior authorised officer, other than the officer who carried out the original checks.

Having completed all of the checks in a) to h) the application for the grant may then be approved in accordance with j) to m).

The HIA will issue the DFG applicants a written decision notice as soon as reasonably practicable, and in the event of a waiting list being in operation, not later than six months after the date of receipt of the duly made application, whether the application is approved or refused.

- a. In the case of grant approval the applicant shall be notified of the work to be carried out and how the grant has been calculated, including the total estimated cost, the total amount of fees, the eligible expense, the applicant's contribution and the amount of grant. The notice shall also state that the funding is being provided by the council and advise of the conditions that are attached to grant funding including repayment in certain circumstances.

or

- b. In the case of a grant refusal the applicant shall be notified of the reasons for the refusal.

A register of approvals shall be maintained, which may be electronic, provided that the electronic means has an audit trail. The council and its auditors will have access to the register, if held by the HIA, for the purposes of information and audit. The required information to be maintained in the register is as follows:

- a. Name and address of the applicant
- b. Name of the disabled person
- c. Total estimated cost of works
- d. Applicants contribution
- e. Total amount of fees
- f. Amount of grant
- g. Type of work
- h. Date of completion

Grant approvals for DFG works are valid for 12 months from the date of approval. Therefore all works funded through a DFG must be completed within 12 months of the date of approval. In exceptional circumstances an application may be made to the HIA for an extension, and the maximum extension which may be granted is 3 months.

a. Site Supervision and approval of additional costs

Site supervision will be carried out by a suitably qualified technical authorised officer from the HIA who will make records of the visits made, and of any advice or instructions given to the contractor and any complaints or concerns of the applicant.

In particular site supervision should cover the following in all cases:

- i. A full inspection of the works carried out to date

- ii. An assessment of the standard of work and in particular an assessment of whether the works carried out complies with the specification and plans (if any).
- iii. Any concerns or complaints of the applicant
- iv. The availability of services; e.g. water, gas, electricity and heating whilst the works are in progress
- v. Any problems with the proposed works specification that would require the input of the OT or the owner of the property; e.g. the landlord.

Where changes to the approved specification are required the authorised officer shall record the circumstances and extents of the changes required and, where appropriate, obtain approval for these changes from the applicant, the OT and the property owner before agreeing them with the contractor. A record shall be kept of all agreed changes to the specification.

Where agreed changes to the specification will revise the costs incurred, the applicant or their representative, being mindful of the funding available, will provide an estimate for these changes from the nominated contractor and the authorised officer of the HIA will assess these costs and approve them as appropriate if they are considered reasonable, or where works are no longer required, have regard to the original estimated cost.

The application for additional funding shall be submitted to the senior authorised officer for approval having regard to:

- a. The reasons for the additional costs and any alternative options considered. Additional costs will not be approved to rectify contractor's errors or through the actions of some other person e.g. the applicant or their representatives.
- b. An assessment that the costs are reasonable for the works to be carried out by the authorised officer.
- c. Where works are no longer required an assessment based on the original estimate of a reasonable reduction in costs
- d. That there is not a more cost effective alternative available.
- e. Where additional costs exceed 10% of the original estimate the Technical Officer of the HIA should obtain approval from a senior authorised officer.
- f. Where additional costs are estimated to exceed 20% of the original estimate the HIA will investigate the reasons why and report these to the council.
- g. The sources of funding available to meet the additional cost having regard to the maximum grant available, and the funding available.

The amount of any additional cost and the reasoning behind the decision to allow these costs will be recorded and the authorised officer of the HIA will authorise the revised grant and inform the applicant and instruct the contractor to carry out the additional work again keeping appropriate records.

9. Payment of Disabled Facilities Grants

Where an application for grant has been approved, the grant may be paid:

- a. in whole after the satisfactory completion of the eligible works, subject to any delayed payment notification in the approval document

or

- b. in part by instalments as the work progresses to an approved standard and the balance after the satisfactory completion of the works subject to any delayed payment notification in the approval document.

Where a grant is paid by instalments, the aggregate of the instalments paid before completion of the eligible works shall not exceed 90% of the amount of the grant awarded.

Where the disabled facilities grant has been approved with delayed payment, payment will not be made before a date specified in the notification of the decision on the applications. This date shall not be more than 12 months after the date of the application.

a. Stage Payments

Following a request from the contractor to pay a stage payment, the HIA authorised officer may agree to a stage payment of the grant, being mindful of the funding available and subject to the following:

- 1) Being satisfied with the quality, workmanship and progress of works made by the contractor from the start on site and that that appropriate Interim Stage Payment Certificate has been completed satisfactorily
- 2) Where more than one contractor is carrying out works and the contractor requesting the payment has completed their works to a satisfactory standard and in accordance with the specification satisfactorily which has been certified by the authorised officer and appropriate certification provided, e.g. electrical certificates.
- 3) That there is a satisfactory invoice from the contractor whose estimate was used to calculate the grant, and is not from a member of the applicant's family and is in accordance with the estimate.
- 4) The applicant agrees to the request and authorises the stage payment on the appropriate form.
- 5) That there is an agreed completion date for the works which is likely to be achieved.
- 6) A maximum of 2 stage payments per grant. The council may agree to additional payments in exceptional circumstances or where the total costs exceed £25,000.
- 7) A minimum payment of £1,000.
- 8) That following the stage payment there will be a minimum of 10% of the original grant remaining.
- 9) That the stage payment is only to the value of works already completed and does not include for any works that have not been carried out.

Payment will only be made to the contractor.

The HIA will keep records of the payments made including dates paid and amounts.

b. Final completion of works and payment

Where the HIA authorised officer is satisfied that all of the grant aided works have been satisfactorily completed the authorised officer shall certify the works as complete having regard to the following:

- That the works have been completed within 12 months of the approval date otherwise additional approval will be required.
- That any necessary certification has been provided and checked for validity e.g. electrical certificate, Building Regulation Certificate.

Where the works have been certified as completed satisfactorily the authorised officer shall authorise final payment subject to:

- The grant having been approved and the same contractor's estimate was used to calculate the grant.
- Being satisfied with the standard of workmanship and quality of work carried out to date and certifying on behalf of the council that it is in accordance with the specification and plans and that the amount requested by the contractor(s) is in accordance with estimate on the appropriate form.
- That the contractor(s) has provided a satisfactory invoice(s)
- The applicant agrees to the request and authorises the final payment on the appropriate form.
- That there is sufficient funding available

Please note payment will only be made to the contractor and not to the applicant.

c. Conditions of payment of Disabled Facilities Grants

Where an application for a DFG has been approved, any payment will be subject to the following conditions:

d. Entitlement to payment

Where an application for disabled facilities grant is approved and it is subsequently found that the applicant(s) was not at the time of the application entitled to the DFG in accordance with the eligibility criteria, no DFG shall be paid. If instalments have already been made then no further monies will be paid and *Lichfield District Council may demand that any monies already paid shall be repaid forthwith, together with interest from the date on which it was paid until repayment, at such reasonable rate as the authority may determine.*

e. Where disabled facilities grant is re-calculated, withheld or repaid

Where an application for a DFG has been approved and the HIA partner ascertains that:

- a. the amount of DFG was determined on the basis of inaccurate or incomplete information and exceeds what the applicant was entitled to; or

- b. without their knowledge the eligible works were started before the application was approved; or
- c. the eligible works are not completed to their satisfaction within 12 months of the date of approval; or
- d. the aggregate of the cost of completing the eligible works and the costs incurred with respect to fees is or is likely to be lower than the estimated expense; or
- e. without their knowledge the eligible works were carried out by a contractor other than the contractor on whose estimate the DFG was based.

The HIA may:

- a. refuse to pay the DFG or any further installment of the DFG which remains to be paid, or
- b. make a reduction in the DFG which, in a case falling within subsection (2)(d), is to be a reduction proportionate to the reduction in the estimated expense;

or

- c. refer to the council for determination of whether to require repayment by the applicant forthwith, in whole or part, of the DFG or any instalment of the disabled facilities grant, together with interest at such reasonable rate as the authority may determine from the date of payment until repayment.

f. Payment of Disabled Facilities Grant to the contractors

Payment of the amount of DFG due will be made directly to the contractor carrying out the work and whose invoice was supplied in support of the request for payment.

It is a condition of payment, unless agreed by prior arrangement with the council, or its nominated delivery partner that the eligible works are carried out by the contractor whose estimate accompanied the application or, where two or more estimates were submitted, by one of these contractors.

10. Change of circumstances affecting the disabled person

Where an application for a DFG has been approved and before the certified date of completion of the works:

- i. the works cease to be necessary or appropriate to meet the needs of the disabled occupant, or
- ii. the disabled person ceases to occupy the property or it ceases to be the intention that he should occupy it, or
- iii. the disabled occupant dies.

The HIA, in consultation with the council where appropriate, may decide having regard to all the circumstances that:

- (a) no disabled facilities grant shall be paid or, as the case may be, no further installments shall be paid,

- (b) the relevant works or some of them should be completed and the disabled facilities grant or an appropriate proportion of it paid, or
- i) the application should be redetermined in the light of the new circumstances.

Where any installments have been paid the HIA will refer to the council for a decision regarding whether any installment of the DFG which has been paid should be repaid forthwith, together with interest from the date on which it was paid until repayment, at such reasonable rate as the authority may determine.

11. Change of Contractor

Where the contractor whose estimate was used to calculate the grant cannot carry out or complete the approved works, including remedial works, the HIA will give appropriate notice in writing to the original contractor of the decision to appoint an alternative contractor. The authorised officer may authorise the revision of the grant by recalculating the grant using the next lowest contractor's estimate available, being mindful of the funding available.

In deciding to revise the grant the authorised officer will consider the following matters:

- a. The reason why the contractor cannot carry out or complete the works
- b. The revised level of grant having regard to the maximum grant
- c. Any other sources of funding available
- d. That the replacement contractor has the experience and ability to carry out the work and is not a relative of the client.
- e. That the OT and the owner of the property approve any changes required to the specification resulting from the change of contractor.
- f. Whether the applicant or property owner has any liability for the additional cost e.g. where there is a dispute or conflict between the applicant or property owner and original contractor.

The authorised officer will make adequate records of the decision to change contractors including the reason and any revision of the grant and notify the applicant in writing.

Where the next lowest contractor or any of the contractors who originally tendered are not able to carry out or complete the works, including remedial works, due to availability the authorised officer may procure an alternative contractor in accordance with the HIA's financial regulations. The authorised officer shall maintain adequate records of the decision.

Where a contractor is not able to complete the approved works to an adequate standard and remedial works are required to the works already completed. The authorised officer shall:

- a. Give notice in writing to the original contractor of the extent of remedial works required and the authorised officer's decision to appoint an alternative contractor to complete the remedial works.
- b. Identify the extent and costs of remedial works required to complete the approved works to a satisfactory standard.

- c. Obtain estimates for the work in accordance with the HIA's financial regulations.
- d. Appoint a contractor to complete the remedial works and issue any certificates required.
- e. Deduct the costs of the remedial works from any monies due to the original contractor for work that has been completed satisfactorily in accordance with the specification.
- f. Keep and maintain adequate records of the decisions made.

12. Maintenance and repair

On expiry of the initial warranty for through-floor lifts, stair-lifts, step lifts, and wash/dry toilets Staffordshire County Council will pay for their servicing, maintenance and repair subject to an annual review and further terms and conditions. The County Council will not usually pay where repairs are due to damage or neglect.

Where adaptations have been provided by construction, any defects liability period (during which any faults will be rectified free of charge) would depend upon the terms of the contract signed between the grant applicant and the building contractor. After this period, responsibility for dealing with all maintenance and repair is the responsibility of the homeowner or landlord of the property.

13. Property Charges

Following legislative changes in May 2008, local authorities were given the power to apply a land charge on an owner-occupied property where a mandatory DFG is awarded, enabling limited repayment of the grant in the event of sale or other disposal of the property within ten years of the certified completion date of the relevant works.

Lichfield District Council will make use of this power for DFG funded works set out in this policy and the charge will be applied where:

- a. the funding given is for a sum exceeding £5000;
- and
- b. the applicant has a qualifying owner's interest in the property at which the relevant works are carried out

Lichfield District Council will require the applicant to repay part of the award that exceeds £5000, subject to a maximum repayment amount of £10,000 if:

- a. the applicant disposes (whether by sale, assignment, transfer or otherwise) of the premises in respect of which the funding was given within 10 years of the certified date; and Lichfield District Council having considered –
 - (i) the extent to which the applicant would suffer financial hardship if they were required to repay all or any of the DFG;
 - (ii) whether the disposal of the premises is to enable the applicant to take up employment, or to change the location of their employment;

- (iii) whether the disposal is made for reasons connected with the physical, mental health or well-being of the applicant or of a disabled occupant of the premises; and
- (iv) whether the disposal is made to enable the applicant to live with or near any person who is disabled or infirm and in need of care, which the applicant is intending to provide, or who is intending to provide care of that the applicant is in need of by reason of disability or infirmity
- (v) that it is reasonable in all circumstances to require the repayment.

Application

In accordance with the conditions set out above a local land charges will be applied for by the Council which are binding on any person who is the owner of the dwelling or building.

Worked Examples:

1. Funding given: £7,000
 - a. Disregarded £5,000
 - b. Amount to be re-paid: £2,000
2. Funding given: £15,000
 - a. Disregarded: £5,000
 - b. Amount to be re-paid: £10,000
3. Funding given: £30,000
Disregarded: £5,000
Amount to be re-paid: £10,000

14. Disabled Facilities Grant Top-Up Property Charges

Lichfield District Council will make use of this power for all DFG Top-Up funded works set out in this policy. The charge will be applied where the applicant has a qualifying owner's interest in the property at which the relevant works are carried out.

Lichfield District Council will require the applicant to repay the full amount of any award in addition to any property charge made regarding the DFG if:

- a. the applicant disposes (whether by sale, assignment, transfer or otherwise) of the premises in respect of which the funding was given within 10 years of the certified date; and
- b. Lichfield District Council having considered –
 - (i) the extent to which the applicant would suffer financial hardship if they were required to repay all or any of the disabled facilities grants;
 - (ii) whether the disposal of the premises is to enable the applicant to take up employment, or to change the location of their employment;
 - (iii) whether the disposal is made for reasons connected with the physical, mental health or well-being of the applicant or of a disabled occupant of the premises; and

- (iv) whether the disposal is made to enable the applicant to live with or near any person who is disabled or infirm and in need of care, which the applicant is intending to provide, or who is intending to provide care of that the applicant is in need of by reason of disability or infirmity
- (v) that it is reasonable in all circumstances to require the repayment.

Application

In accordance with the conditions set out above a local land charge will be applied for by the council which is binding on any person who is the owner of the dwelling or building.

Appendix B – Standard Specification (DFG works)

The following specifications must be used when developing and designing schedules of work, specifications and drawings for Disabled Facilities Grant (DFG) funded works. Where any alterations or deviations from this specification are proposed, these must be agreed with the HIA.

The specification assumes that the applicant or their representative will ensure that the builder will undertake exploratory works to ensure that correct falls exist to connect to the existing drainage system. Consultation must be made to ensure the proposals conform with current Building Regulations before work commences and that any necessary Building Regulation Approvals and Planning Permissions required are obtained.

The specification should not be considered exhaustive; the applicant, or their representative, should ensure that the contractor allows for all items necessary to complete the contract to an acceptable, reasonable and professional standard.

- The applicant or their representative will ensure that contractors visit all properties when submitting quotations for works.
- It is the contractors' responsibility to inform the Building Control Department of Lichfield District Council on commencement of building works and provide a Completion Certificate with the request for payment.
- Throughout the contract, consideration should be allowed at all times for the clients disabilities, and in particular, allowance should be made in the quotation to ensure that the client has access at all times to washing and toileting facilities. In the event of this being impractical, alternative arrangements should be agreed in advance
- It is assumed that the contractor will price for, and supply traditional copper and chrome plated plumbing, with Yorkshire soldered joints (compression joints are acceptable in roof voids etc.) PVC push fit systems will not be acceptable for works carried out within Lichfield District.
- All works to gas appliances to be undertaken by registered 'Gas Safe' contractor and a gas safety certificate provided on completion.
- Any electrical works are to be undertaken by an approved N.I.C.E.I.C. contractor and who are members of the competent person's scheme as outlined in part P of the Building Regulations, and a certificate provided on completion. Wiring shall be chased-in, sheathed and surfaces made good. Surface wiring will not be accepted unless agreed by the HIA's authorised officer.
- Wherever structural alterations are required (e.g. door widening or wall removal) the Contractor shall ensure that necessary inspections

have been carried out and load-bearing structures identified and that adequate support is provided.

- The shower area shall be of a size deemed appropriate to meet the client's long-term needs and will be the responsibility of the Occupational Therapist, in conjunction with the authorised technical officer of the HIA.
- All shower former units shall be installed perfectly level and true and additional care must be taken to ensure this.
- All shower curtain rails are to be pre-formed and are matched to the shower area and installed at door head height.
- All shower curtains must be adequate width, and full length with anti-mould treatment (e.g. Micro-Ban).
- Shower floor coverings to be safety anti-slip flooring suitable for continually wet areas and installed to manufacturers guidelines and recommendations.
- Shower units shall be 9kw minimum with a thermostatically controlled anti-scald device and stabilisation valve, with an extended riser pole and shower hose and have a detachable shower head. Controls to be at a height to suit the client seated in a shower chair. The isolator pull switch to be located outside of the shower area.
- Within a shower room, funding is only available, for the tiling of 2 walls enclosing the shower area in plain white contract tiles. Over-tiling is not acceptable.
- In mobile home adaptations "Notile" wall panels in white tile finish by composite Fibreglass Mouldings Limited (01325 246066) shall be used in lieu of ceramic wall tiles to the 2 walls adjacent to the shower area, fitted in accordance with manufacturers recommendations.
- To ensure the provision of adequate access, a new white close-coupled W.C. shall be installed 500mm from centre-line of the pan to the adjacent wall. Any variation from this will be the responsibility of the Occupational Therapist, in conjunction with the authorised technical officer of the HIA, to ensure it meets the applicant's long-term needs.
- "Kwik Fit" flexible toilet connectors will not be accepted; where the W.C unit needs to be repositioned the contractor is to allow for a new foul drainage connection with a conventional smooth PVC connector.
- All W.H.B. to be fitted on wall brackets to allow adequate knee clearance for a person in a wheelchair and to be fitted with quarter-turn short lever taps.

- Ensure a minimum of 2 x 300mm grab rails are fitted within the shower room in positions to suit the client.
- Ensure all shower rooms are fitted with an IPX7 rated extractor fan which is capable of extracting 15 litres of air per second and not exceed 20 litres per second and which may be independently controlled by a pull switch within the shower room.
- Ensure all shower rooms are fitted with an IP65 rated moisture proof light fitting, operated by a pull switch within the shower room.
- Ensure all door alterations are suitable for independent wheelchair access; having a maximum cill profile of 15mm; with 838mm minimum door width, providing 770mm minimum access width. Any variation of this will be the responsibility of the Occupational Therapist, in conjunction with the HIA's authorised technical officer, to ensure it meets the applicant's long-term needs.
- All ramped access must achieve a maximum 1:12 gradient and have a 1200mm by 1200mm level platform at door threshold or change of direction. Any variation of this will be the responsibility of the Occupational Therapist, in conjunction with the authorised technical officer of the HIA, to ensure it meets the applicant's long-term needs.
- Where necessary, construct a ground floor extension comprising a Bedroom of a size recommended in "Designing for the Disabled by Selwyn Goldsmith", with tiled and insulated pitched roofs and nil maintenance gable, in brickwork and blockwork construction to match existing, all as indicated on the architectural plans and suitable for the needs of a disabled person, and spouse. The whole works are to comply with current Planning and Building regulations. **(Note: work to the bedroom will have a V.A.T component, the client or their representative to ensure this is indicated separately).**

Appendix C – Emergency Home Repair Assistance Priority Assessment

Table A

| Applicant | Category of Applicant | Works | Category of Works |
|---|-----------------------|--|-------------------|
| Disabled, Over 65 on income related benefits | 1 | Single item of disrepair leading to a dangerous situation which presents a Category 1 Hazard under HHSRS | A |
| Disabled, under 65 and on income related benefits | 2 | Protect the occupants from immediate exposure to dangerous insecure building elements | B |
| Over 65 on Income related benefits | 3 | Single item of repair to remedy a situation prejudicial to the occupants health | C |
| Under 65 and on income related benefits | 4 | Secure a property from the effects of wind and rain | D |
| 'Vulnerable' due to income level (See current criteria) | 5 | Works to improve the security of dwellings for repeat victims of crime | E |

1. The category of the applicant will be determined from Table A above based on the information supplied by the applicant
2. The category of work in Table A will be assessed on the information given by the applicant.
3. This will give an overall category e.g. Applicant is disabled and over 65 on income-related benefits (Category 1); Works required are an adaptation (Category E); therefore the overall Category is 1E.
4. This overall category is then used to determine the priority score using Table B below:

Table B

| | A | B | C | D | E |
|---|-----|----|----|----|----|
| 1 | 100 | 90 | 80 | 70 | 60 |
| 2 | 90 | 81 | 72 | 63 | 54 |
| 3 | 80 | 72 | 64 | 56 | 48 |
| 4 | 70 | 63 | 56 | 49 | 42 |
| 5 | 60 | 54 | 48 | 42 | 36 |

The priority score is determined by selecting the applicant category and reading across the table until the appropriate work category column is reached and this is the priority score.

In the example given above, the overall category was 1E and by looking across the row beginning with 1 until the column marked E is reached the score is shown as 60. Where points allocated are equal, preference will be given to the applicant in the highest category in Table A.

Table C

Examples of Works in each Category:

| Category of Works | Works | Definition of Work Category |
|--------------------------|---|--|
| A | Single item of disrepair leading to a dangerous situation | <ul style="list-style-type: none"> • Category 1 Hazards under HHSRS • Dangerous Electrics – accompanied by NICEIC certificate to confirm • Movement of Foundations – incl. Structural Engineers Report |
| B | Protect the occupants from immediate exposure to dangerous insecure building elements | <ul style="list-style-type: none"> • Collapsing floor, ceiling or wall • Fractured lintel over window or door • Defective Roofing • Chimney fractured & spreading |
| C | Single item of repair to remedy a situation prejudicial to the occupants health | <ul style="list-style-type: none"> • Lead Piping to water supply ;damp; drainage Issues; • Lack of constant supply of hot & cold running water; • Lack of w.c. & foul drainage; • Evidence of rising, penetrating & condensation damp & mould; • Inadequate working heating system⁹ in the main living and sleeping areas; or limited heating provision leading to risk to the health of the occupants • Lack of ventilation resulting in dampness & mould. |
| D | Secure a property from the effects of wind and rain | <ul style="list-style-type: none"> • Disrepair resulting in storm-water penetration into the property (incl roof works; 'serious' door & window defects & flood prevention works) |
| E | Works to improve the security of dwellings for repeat victims of crime | <ul style="list-style-type: none"> • Possible lighting; locks & alarms – works as detailed by crime prevention officer following at least 2 reported incidents. |

The list of items in Table C is not an exclusive list and is to be considered a guide on what may be eligible for Emergency Assistance. Each application for assistance will be considered on an individual basis.

¹ If there is gas central heating present it must be condemned, be beyond economical repair or have a permanent fault resulting in the applicant having no heating and/or hot water before a whole system will be replaced. This must be confirmed by a 'Gas-Care' Registered Engineers report. Where intermittent faults are present repairs will be considered, on a case-by-case basis, following receipt of a 'Gas Care' Registered Engineers report on the system. Grants are not available to properties with fully functioning storage heaters or warm air systems that provide 'whole house' heating regardless of age or model. Grants will not be given if the gas central heating present is working adequately regardless of the age or model. The grant does not provide individual maintenance and upgrade work such as additional radiators, boiler servicing, system flushes or control installations.