



*Disabled Facilities Grant Programme:
The Government's proposals to
improve programme delivery*

Summary of responses



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improve programme delivery*

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Introduction

The Government recognises that the Disabled Facilities Grant (DFG) Programme needs updating and improving. In January 2004 Communities and Local Government (formerly the Office of the Deputy Prime Minister) started a wide ranging, interdepartmental review of DFG to consider what changes were necessary and in that context commissioned an independent review of the programme from the University of Bristol.

The Bristol Report identified a number of problems and challenges facing the DFG programme, and made recommendations to the Government on how to improve the programme. The Government implemented the recommendation to exempt children's cases from means testing straight away. This meant that families needing to adapt their homes to care for a disabled child are no longer subject to means testing.

The Government has considered the recommendations in the Bristol Report alongside recent policy developments and Communities and Local Government launched the consultation *Disabled Facilities Grant Programme: The Government's proposals to improve programme delivery*. The consultation sought comments and suggestions on the proposals aimed at making the help available more accessible, comprehensive and fair. The changes proposed would enable local authorities (LAs) to deliver more front line support to disabled people as part of a wider package to support independent living.

This document provides a summary of consultation responses, taking each proposal in turn and provides the Government's interim response ahead of the results of the Government's Comprehensive Spending Review (CSR) 2007. Decisions on funding will be subject to the results of the CSR which are expected in the Autumn.

The consultation exercise ran from 18 January 2007 until 13 April 2007, although late responses were accepted after that date. The Department received 253 responses to its consultation paper.

The breakdown of respondents is as follows:

Local authorities	179
Disability organisations	11
General voluntary organisations	4
Housing, health professionals and organisations	28
Home Improvement Agencies	10
Housing associations/Registered social landlords	14
Miscellaneous individuals and organisations	7

Consultation proposals and summary of responses

Proposal: Increase the maximum grant limit of £25,000 to £30,000, then to £50,000 in stages if the evidence shows that local authorities are realising sufficient offsetting savings through using powers to reclaim DFG.

Responses showed widespread support for increasing the grant to £30,000. There was also substantial support for increasing the grant to £50,000.

A number of respondents noted that in some parts of the country £50,000 would not be sufficient to pay for the most expensive adaptations.

Local Authorities in particular expressed concern that the potential receipts from reclaiming the grants would not be sufficient to fund the increase to the maximum limit.

Proposal: Power for local authorities to reclaim DFG in certain cases when adapted property in owner occupation is sold, subject to safeguards and limits. A charge would be placed against the adapted property.

Three options were proposed:

- A) A charge for grant above £5,000, limited to a £10,000 maximum charge.**
- B) A charge for grant above £10,000, limited to 80 percent of the total grant.**
- C) A charge for grant above £10,000, limited to a £10,000 maximum charge.**

The majority of respondents supported this proposal. Of the three options put forward, option A was the most popular, followed by option B.

Despite the broad support for charging in principle, many expressed concerns about the potential impact. For example, that the charge could act as a disincentive to the take up of essential adaptations. Also it was noted that many adaptations do not enhance the value of a home and could devalue a property. Some LAs suggested the safeguards should be discretionary and that the range and scope of exemptions would have a significant impact on the level of grants that could be reclaimed.

Many LAs commented that there would be a substantial time lag between setting up a charging scheme and receiving resources back from them. In some areas a higher percentage of DFG grants are awarded to Housing Association (HAs) properties and this would restrict the potential to reclaim the grant.

Observations on the safeguards for the charging proposal

- 1. Only apply where the disabled person who was the relevant person for the purposes of the means test, also owned the property.**

This safeguard was not supported by the majority of responses who commented. One of the reasons offered was that the benefit would still be realised by the owner when the property was sold.

- 2. The charge would last a maximum of 10 years.**

This proposal received overall support among those who expressed an opinion.

3. Provisions to exempt from the charge applicants who had to move to alternative accommodation in the private sector for a variety of personal reasons.

Many expressed concerned that this safeguard was too vague and required further clarification.

4. The charge should not apply to applications concerning adaptations for disabled children.

There was considerable opposition to adaptations for disabled children being excluded from charging. Many noted that adaptations for children tended to be the most expensive and added the most value to a property.

Proposal: Improve the means test. Views were invited on which of the following changes to the DFG means test would be most beneficial and help target assistance to those most in need:

- 1. To disregard working tax credit and child tax credit as income to be taken into account.**
- 2. To allow for either average or actual housing costs (whichever is the higher) to be taken into consideration when determining the financial position of any person subject to the means test.**
- 3. To disregard the first element of earned income with the amount depending on available resources.**
- 4. To simplify the DFG means test by increasing the range of benefits which would entitle a DFG applicant to be passported through for maximum automatic assistance.**

The majority of respondents supported making changes to the DFG means test. The passporting proposal (number four) gained the most support. A significant number of respondents expressed concern about the inclusion of some of the listed benefits as they are not income related.

The second most popular proposal was to allow either average or actual housing costs to be used in the means test (number two). A number of respondents suggested that there should be some provision made to take regional variations into account.

The proposal to disregard the first element of earned income from the means test (number three) received the least support. Some of those who commented on this proposal requested further detail.

Proposal: Allow greater flexibility to use central government ring-fenced funding for DFG. Two options were proposed:

- 1. The ring-fence around the funding will be maintained, but its scope widened to support any LA expenditure incurred under the Regulatory Reform**

(Housing Assistance) (England and Wales) Order 2002. This would be in addition to expenditure incurred under the Housing Grants, Construction and Regeneration Act 1996 (the 1996 Act) for mandatory DFG.

- 2. To provide a targeted grant to LAs. The grant will no longer be ring-fenced, but Regional Assemblies (RAs) will be in a position to monitor how the funds are spent by the authorities in relation to the outcomes to be achieved.**

The proposal to improve the flexibility of the DFG funding received widespread support across all groups. Whilst it was acknowledged that the current 60/40 split in funding between central government and the local authority was too restrictive there was concern that any move away from the current split would need to be costed and that current proposals lacked clarity.

There were also concerns that the proposals did not address tenure neutrality. Local authorities in particular were concerned that proposals placed no obligation on HAs to provide adaptations to their housing stock as is the case with local authority housing. Furthermore, proposals to reclaim grants which would apply only to owner occupiers appeared to discriminate.

Option one, to retain the ring fence and widen the scope, received most support. A general concern was expressed that if the ring fence was abolished there would be a risk that funds intended for DFG could be redirected for other purposes. A small number of those who responded commented that the widening of the ring fence to include work under the RRO could increase budget pressures.

Proposal: Clarify that access to the garden is covered by DFG legislation, by making it a specific purpose for grant.

There was widespread support across all groups for DFG to include provision for access to the garden and other outside areas. Disabled groups and related organisations commented on the potential health benefits and improved quality of life. A number of concerns were raised about the cost and the need for specific guidance on the coverage of this access. For example, whether it would cover both the front and rear gardens, communal areas and if it would extend beyond the living space.

Proposal: Issue new guidance to Regional Assemblies to ensure that Regional Housing Strategies have a more explicit policy on adaptations as well as a more strategic and coherent approach to accessible housing.

Proposals to issue new guidance to Regional Assemblies to ensure a more explicit policy on adaptations and a more strategic approach to accessible housing were widely supported by those who expressed a view. Some respondents expressed concern that the Regional Assemblies were too far removed to be able to take full account of needs at a district level particularly if they are to exercise greater influence over the allocation of available funding.

Proposal: Simplify the funding system for housing associations (HAs) with one funding source for major adaptation. And guidance for HAs emphasising the need for them to contribute towards the regional strategy on accessible housing and to reach local agreements with local authorities in relation to major housing adaptations with a view to sharing the cost.

The proposal to issue guidance to HAs to encourage them to contribute towards a regional strategy on accessible housing and enter into local agreements with local authorities, received widespread support. Whilst local agreements were broadly welcomed, concern was expressed that there was no mandatory requirement for HAs to contribute to the cost of adaptations. HAs expressed concern that no funds had been identified to enable them to undertake this responsibility. It was also noted that many HAs operate across a wide number of local authority areas which could be potentially problematic where agreements need to be reached with a number of local authorities.

The proposal to redistribute the Social Housing Grant (SHG) through the central DFG fund received overall support. Some concern was expressed that removing the SHG funding stream would encourage housing associations to view DFG as the only source of funding for adaptations and place further pressure on budgets.

Proposal: Pilot the increased use of Home Improvement Agencies (HIAs) in the delivery of housing adaptations. Two possible initiatives:

- 1. To provide a rapid response for the prevention of accidents and promote early release from hospital.**
- 2. To provide a full agency service for housing adaptations in county areas.**

The proposal to enhance the role of the HIAs in delivering adaptations received majority support among those who expressed a view on the issue. Of the two initiatives proposed the 'rapid response programme' (option one) received the most support. Some LAs commented that it was not necessary for HIAs to take over the delivery of adaptations in all areas, that HIAs across the country were not uniform and that their role as an independent advocate would be compromised by budgetary responsibility.

Proposal: Re-designate stair lifts as items of equipment to be provided by the Community Equipment Service rather than through DFGs.

Proposals to re-designate stair lifts as equipment and be provided through the Community Equipment Service received widespread support. However it was noted that stair lifts specifically designed for a particular property had little potential for reuse.

Proposal: Promote new methods for procurement of adaptations equipment to reduce costs.

The potential benefits of improved procurement were widely acknowledged and the majority of those who expressed a view supported the proposal. Some respondents expressed concern that moves toward regional procurement could lead to a reduction in the use of local contractors with local knowledge and reduce the benefits to the local economy. It was also noted that harmonising procurement practices between authorities could be difficult.

Proposal: Introduce a simplified application process for DFG.

There was widespread support for the application process to be simplified and for a simplified form to be available online. However, some respondents commented that the information requested on the form was necessary and should not be lost by simplifying the form.

Proposal: Disabled Facilities Grant would be re-badged and called Accessible Homes Grant to reflect its wider ambit.

The majority of those who expressed a view on this proposal supported the change, acknowledging that the new name captured the expanded scope of the grant. However there were concerns about the costs of re-branding, the loss of a familiar name and whether the use of 'assistance' rather than 'grant' would be more appropriate.

Other issues raised

Comments were received on other areas:

- There was considerable support for VAT to be abolished on all works of adaptation. This proposal from the Bristol report falls within the wider Treasury review of fiscal policy.
- It was broadly acknowledged that there remained a need to ensure that assessments should be undertaken by a qualified Occupational Therapist (OT) or a proven specialist, particularly with a view to establishing long term, rather than just immediate needs. It was also noted that in some cases (for minor adaptations in particular) self assessment may be an appropriate alternative to full OT assessment.
- The Lifetime Homes Standard was widely acknowledged to be positive. There was support for the inclusion of the standard, as part of the Code of Sustainable Building, to become mandatory. It was also suggested that the Lifetime Homes Standard was not robust enough and whilst it provided for the elderly it did not take into account the more complex needs of the severely disabled.
- Specific guidance and clarification on the scope for applying DFG to applications for people with behavioural and learning difficulties was requested. It was commented that it was difficult to obtain standardised assessments for children with autism or other behavioural problems.
- There was interest in the evaluation of the Individual Budget (IBs) Pilots. It was noted that if IBs are rolled out nationally, there was a need to harmonise means tests to eliminate inconsistencies. Some concerns were raised that IBs could be too complicated and that DFG funding could be lost to other priorities.
- Establishing a disabled/accessible housing register was considered a positive step. However it was noted by LAs that registers can be difficult to operate and adaptations are often non-transferable. In order to improve registers it was suggested that a national standard for the categorisation of adaptations be established to ensure consistent recording of adaptations and enable easy comparisons to be made between properties.

Conclusion

We have welcomed the significant response to the consultation which indicates strong support to modernise and improve the DFG programme. Over 250 organisations fed in their views on how the programme could be improved. This reflects how important this programme is and the value placed on DFG. In light of the range of comments and suggestions received we are committed to carry out further work on how we can develop these proposals fully.

This conclusion forms our initial thoughts following the response to the DFG consultation. It is not an exhaustive list of the work we now intend to take forward over the coming months.

Some changes to the DFG programme have cost implications and decisions about these cannot be made until the Comprehensive Spending Review is completed. The consultation process also recognised that existing demand for DFG has generated pressures on the programme, and raised concerns that any changes the Government introduces must be sufficiently funded, and not cause additional strain on the current system.

Maximum Limit

Respondents expressed strong support for the proposal to increase the maximum limit of DFG to £30,000. This reflects the increased costs of carrying out DFG work, combined with a requirement for adaptations for those with increasingly complex needs. An increase to the maximum limit cannot be introduced without additional resources to support this proposal. We have received many enquiries on this subject and would like to clarify that should the maximum limit be raised, this will not take effect in 2007-08. We will consider introducing this increase, subject to securing adequate funding to resource the proposal over the long term.

There was also support for increasing the maximum limit of DFG to £50,000, although there was concern from respondents that this increase may not be sufficiently supported by the consultation proposal for grant revenue to be recycled through charges on properties. Further work on the potential for charges to support this increase will need to be undertaken including how such changes may be phased in.

Charges

Many respondents supported the introduction of charges on properties. Of the three options proposed the proposal to put a charge to the portion of grant above £5,000, but limited to a maximum charge of £10,000, received the majority of support. We acknowledge that some respondents raised genuine concerns over the potential negative impact that charging may have. The range and scope of the exemptions were identified as having the potential to reduce the revenue generated by the charge. In particular the proposal to exempt adaptations for disabled children from the charge provoked a particularly strong response. In light of the varied responses that have been received we will undertake further analysis of the charging proposals and the potential impact of the range of exemptions currently proposed.

Means test

In line with our objectives to modernise and simplify the DFG programme, early analysis also indicates support for the administration of the means test to be simplified. Of the options put forward, the proposal to increase passporting secured the majority of support. We recognise the concerns raised over the range of benefits included in the passporting proposal. In recognition of these concerns further work will be required to assess how passporting can be utilised effectively to deliver a fair and improved service. We will work with other government departments to establish how this can be best achieved, subject to the availability of resources. We acknowledge that improvements in delivery could be assisted through a simplified application form and easier online access. We will work with the LGA and stakeholders in order to establish how this can best be achieved.

Guidance and single funding stream

There was clear support for proposals to provide guidance to Regional Assemblies, local authorities and housing associations. We are committed to undertaking further work with the relevant bodies to ensure better strategic planning and more effective partnership working. Where possible we will be seeking to draw upon and utilise current research and evidence of best practice already being undertaken across the country. There was also majority support for the proposal to transfer the Social Housing Grant to DFG, and we intend to proceed with this proposal.

Access to the garden

Many respondents supported the proposal on clarifying access to garden areas for disabled people. Whilst this assistance can already be provided under current legislation, we are inclined to make access to the garden a specific purpose for which a grant must be approved. A number of local authorities raised concerns over the range and scope of the works to be covered by the proposal, and the potential cost implications. As with other changes with cost implications, we will not implement this change prior to securing an appropriate level of funding.

Funding flexibility

Responses also indicated that the scope of DFG is currently too restrictive and that moves towards increased flexibility would be welcomed. In recognition of this response we will undertake further work to review the current ring fence. DFG has formed part of the Individual Budgets pilot in which a greater degree of flexibility for the use of DFG has been agreed, an evaluation of this approach will be carried out which will help inform proposals around flexibility. We will continue to review the funding arrangements in line with other departmental changes and in consultation with colleagues from other government departments and the Treasury to establish the most appropriate way to introduce greater flexibility to DFG funding.

Once this further work is complete and the future funding position for DFG is known, the Government intends to announce a package of changes to improve the programme and help raise the quality of support provided through DFG.

Annex 1

List of respondents:

A1 Housing Bassetlaw Ltd
Age Concern
Alison Dixon, Occupational Therapist (OT)
Alison Honour, Community Children's OT
Anchor Staying Put – Mid Sussex and Crawley HIA
Angela White, Community OT
Anthony Allott, OT
Ashford Borough Council
Aspire – Supporting People with Spinal Injury
Aspire Housing Ltd
Association of Residential Managing Agents
Association of Retirement Housing Managers
Audit Commission
Aylesbury Vale District Council
Balbir Frankin, OT
Basildon District Council
Basingstoke and Deane Borough Council
Birmingham City Council
Blyth Valley Borough Council
Bolsover District Council
Bolton Council
Bournemouth Borough Council
Bournville Village Trust
Bracknell Forest Borough Council
Bradford Department of Social Services
Bradford District Council – Private Sector Housing
Breckland Council
Brentwood Borough Council
Brighton and Hove City Council
Bristol Care and Repair
Burnley Borough Council
Bury Metropolitan Borough Council
Calderdale Council
Cambridge City Council Housing Services – Home Aid Manager (HIA)
Cambridge City Council Housing Strategy Officer
Cambridgeshire Primary Care Trust
Canterbury City Council
Care and Repair England
Carol Daw, OT
Central Lancashire Housing Partnership
Central Region Adaptations Benchmarking Club
Chartered Institute of Environmental Health
Chartered Institute Of Housing
Cheshire County Council
Cheshire Peaks & Plains HT
Chester City Council
City of Durham Council, Environmental Health

City of Lincoln Council
City of Westminster
City of York
College of Occupational Therapists
College of Occupational Therapists – Children Young People and Families
Specialist Section
Colne Housing
Council for Disabled Children
Coventry City Council
Craven HA, Yorkshire Housing Group
Cumbria Children's Services
Cumbria HIA Partnership
Dartford Borough Council
Denise Anderson-Moll, OT
Derby City Council
Derbyshire County Council
Devon Chief Environmental Officers' Housing Sub Group
Devon Children with Special Needs Housing Panel
Devon County Council Adult and Community Services
Disability Rights Commission
DISC Ltd
Doncaster Physical Disability and Sensory Impairment Partnership Board
Dorset County Council (multi agency response)
Dorset County Council Disabilities Team
Dorset Local Authorities Private Sector Housing Group
Dover District Council
Dudley Metropolitan Borough Council
Durham County Council Occupational Health Therapists
Durham Housing and Neighbourhoods Group
East Lindsey District Council
East Cambridgeshire District Council
East Dorset District Council
East Hampshire District Council,
East Midlands Regional Assembly
East Northamptonshire Council
East of England Regional Assembly
East of England regional Disability Facilities Grants Group
East Sussex Adult Social Care
Eastbourne Borough Council
Eastleigh Borough Council
Ellesmere Port and Neston Borough Council
Enfield Disability Action
Epping Forest District Council
Essex County Council – Adult Social Care
Essex County Council – Head of Strategic Planning and Resources
Festival Housing Group
Foundation for People with Learning Difficulties
Foundations National Co-ordinating Body for Home Improvement Agencies
Gateshead Council
Gloucestershire NHS Primary Care Trust
Gosport Borough Council
Gravesham Borough Council

Greater Haven Gateway Sub Regional Private Sector Housing Group
Greater Norwich Housing Partnership
Grunden Consulting
Habinteg Housing Association
Halton Borough Council
Hampshire County Council
Hampshire County Council Adults and Children's Services
Hanover Housing Association
Harborough District Council
Hastings Borough Council
Havant Borough Council
Help the Aged
Herefordshire Council
Hertfordshire and Bedfordshire Housing Specialist Groups
Hertfordshire Housing Liaison Group
Horsham District Council
Huntingdonshire District Council
Hyndburn Borough Council
Inquilab Housing Association
Irene Lewis, OT
Joint District and Borough Councils of West Sussex and West Sussex County Council
Kent County Council – Adult Social Services
Kent Housing Group
Kerrier District Council
Kingston upon Thames Council
Leeds City Council
Leicester Housing and Regeneration Office
Leicestershire County Council
Lewes District Council
Lewisham Independence – Therapy and Rehab Service
Lift and Escalator Industry Association
Lincolnshire County Council
Local Government Association
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bromley
London Borough of Bromley, Occupational Therapy Team
London Borough of Camden Council
London Borough of Ealing
London Borough of Hackney
London Borough of Hillingdon
London Borough of Islington
London Borough of Merton
London Borough of Newham HIA Manager
London Borough of Newham, Occupational Therapy Team
London Borough of Richmond-upon-Thames
London Borough of Southwark – Housing Regeneration Initiatives
London Borough of Sutton
London Borough of Sutton Children with Disabilities Team
London Borough of Tower Hamlets
London Borough of Wandsworth
London Councils

Luton Borough Council
Maidstone Borough Council
Medway Council
Mencap
Mendip District Council
Metropolitan Borough of Wirral
Michele Finney, Specialist Housing OT
Middlesbrough Council
Miriam Fallon, Occupational Therapist
Motor Neurone Disease
Multiple Sclerosis Society
Newcastle City Council
Norfolk County Council
Norfolk Home Improvement Agencies
North East Assembly
North East Lincolnshire Council
North Tyneside Council
North Warwickshire Borough Council
North West Regional Assembly
North Yorkshire LAs joint response
Northern Adaptations Group
Northern Housing Consortium
Northumberland Care Trust
Northumberland Home Improvement Agency
Notting Hill Housing Trust
Nottingham City Council – Adult Services, Housing and Health.
Nottinghamshire County Council Adult Social Care and Health
Parkinson's Disease Society
Penwith Accessible Homes Partnership
Phil Elliott
Phil Scott, OT
Places for People
Pluss Equipping
Plymouth City Council
POhWER the Advocacy Agency
Portsmouth City Council
Reading Borough Council
Redcar and Cleveland Borough Council
Redditch Borough Council
Reigate and Banstead Borough Council
Ribble Valley Borough Councils
Rotherham Metropolitan Borough Council
Royal Borough of Kensington and Chelsea
Royal Borough of Windsor and Maidenhead OT/Environmental Health Departments
Royal National Institute for the Blind
Runnymede Borough Council
Rushmoor Borough Council
Sandwell Metropolitan Borough Council
Scope – Policy and Government Affairs Division (Adults)
Sedgefield Borough
Sefton Council – Health and Social Care Directorate
Sevenoaks District Council

Sheffield City Council
Shropshire and Herefordshire Housing Renewal Group
South Bedfordshire District Council – Bedfordshire Sub-regional response
South Buckinghamshire District Council
South East Regional Housing Forum
South Northamptonshire Council
South Oxfordshire District Council
Southampton City Council
Spinal Injuries Association (SIA)
Staffordshire Moorlands District Council
Stockport Metropolitan Borough Council
Stockton on Tees Borough Council
Stockton on Tees Borough Council
Stoke on Trent City Council – Housing Services Division
Suffolk Coastal District Council
Suffolk County Council
Suffolk County Council, Adult and Community Services
Suffolk Home Improvement Agency Forum
Sunderland City Council
Swale Borough Council
Tameside Metropolitan Borough Council
Tees Community Equipment Service
Telford and Wrekin Council
Thanet District Council
The Guinness Trust
The Law Society
Three Rivers District Council – Housing and Health
Tonbridge and Malling
Trafford Council
Tunbridge Wells Borough Council
Tynedale Council
Vanguard Consultants
Wakefield Metropolitan District Council
Warrington Borough Council
Warwickshire County Council -combined response
Wealden District Council
Wear Valley District Council
West Berkshire Council
West Dorset District Council
West Lancashire District Council
West London Housing Partnership
West Midlands Regional Assembly
West of England Housing Officer Group
West Oxfordshire District Council
West Wiltshire Housing Society
Whitefriars Housing Group
Wiltshire Council
Wolverhampton City Council
Wychavon District Council
Wyre Borough Council
Wyre Forest District Council