



The Right Home: the **Housing** Needs of **People with Disabilities**

A Social Policy Report by the Citizens Information Board
and the Disability Federation of Ireland





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Acknowledgements

We gratefully acknowledge the contribution of the National Advocacy Service, NAS, for People with Disabilities who provided very valuable and useful anonymised illustrative case studies. Important insights were provided by DFI member organisations which are also gratefully acknowledged. The report was enhanced by inputs from both the CIB social policy and research team and the DFI policy and research team.

This study was funded by the Citizens Information Board.
2022

Preface

Over the past decade there have been some advances in enabling independent living by people with disabilities and in addressing barriers to community participation. The move out of congregated settings has been an important and welcome development. Some disabled people living in unsuitable housing situations have been supported to live independently over the past decade, although progress has not been consistent.

Housing policy is critical to enabling disabled people to enjoy equality of opportunity, to exercise personal choice, to participate fully in society, and to live with independence. While Ireland is currently dealing with a major housing crisis generally, it is clear that the housing options available to disabled people continue to fall short of those available to the general population. Similarly, while societal understanding of the needs and rights of disabled people has gradually improved, some assumptions persist that people with disabilities should be looked after by family or charities and, by implication, that they should remain dependent rather than become independent.

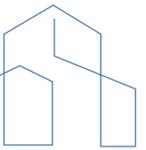
This social policy report¹, prepared jointly by the Citizens Information Board (CIB) and the Disability Federation of Ireland (DFI), sets out to explore, analyse and assess the experiences of disabled people in accessing accommodation, and to compare and contrast those experiences with the commitments made in national and local strategies and plans, and in social housing policy generally. In addition to considering

the available published data, the research draws on reports and case materials from the National Advocacy Service for People with Disabilities (NAS), from DFI staff and member organisations and data from Citizens Information Services (CISs) relating to queries on housing needs. The level and extent to which people with disabilities face challenges and difficulties in accessing accommodation is a major ongoing issue identified by NAS and CISs, representing a significant level of NAS's caseload in recent years. DFI member organisations report similar levels of concern.

As reflected in assessments of delivery under the first *National Housing Strategy for People with a Disability 2011-2016 (extended to 2021)*, this report identifies a considerable gap between the strategy's policy aspirations and the reality of its implementation. While acknowledging the severe housing crisis that Ireland has been experiencing, the report documents the disproportionate extent to which people with disabilities are failed by the system, and the range of challenges that they continue to experience in seeking to find a suitable home to live in.

Both the new housing policy, the *National Housing Strategy for Disabled People 2022 – 2027* launched in January 2022, and the previous national strategy state that meeting the accommodation needs of disabled people is a public policy priority and that there is a need for leadership, resourcing, support and direction at a national level. Evidence points to a wide variation in performance and practice

¹ This report revisits similar research, undertaken by both organisations on the housing needs of people with disabilities. *The Right Living Space – Housing and Accommodation Needs of People with Disabilities (CIB/DFI 2007)*



across the different Local Authorities, who are responsible for implementing the policy at county level. It is clear that there will not be effective delivery of accommodation without the funding, support, guidance and monitoring of central government. This report echoes the national strategy in pointing to the need for a 'whole of government approach' to this issue, in order to ensure that there is effective collaboration and cooperation between all relevant Departments in delivering on the promised targets, as well as robust management and monitoring of local delivery and practices.

For disabled people who wish to live independently, the co-ordination of suitable accommodation delivery with the provision of health and social care supports is essential. Such coordination has not always been evident, as the findings in this report demonstrate. There is an ongoing need to strengthen, support and align collaboration and cooperation mechanisms at local and national level. Ensuring sufficient and simultaneous funding for accommodation provision and for social and health support provision is also critical.

Provision of social housing in Ireland has become increasingly dependent on the private rental sector in recent decades. This trend has created particular difficulties for disabled people. The report highlights that while some landlords have been receptive and innovative in catering for disabled tenants, there are serious and unaddressed challenges connected with relying on the private rented sector as a preferred or predominant social housing option.

Many disabled people continue to face access and adaptation challenges. Despite general commitments being made to universal design and lifetime-adaptable design principles, much more needs to be done to mainstream this approach in housing policy. Disability organisations have also called for reform of the planning and building regulations.

Accommodation provision for disabled people is a crucial component in ensuring their participation in society in a manner that respects their rights, offers opportunities and choices, and facilitates independence. The publication of the *National Housing Strategy for Disabled People 2022-2027* is a welcome development and reiteration of the Government's commitment. Notwithstanding these commitments, there were shortcomings in the delivery of the previous strategy. The implementation process of the new strategy at both local and national levels of government will therefore be crucial. Adequate funding, effective collaboration, and robust management, oversight and reporting must all form integral components of implementation.

Nothing less will be sufficient to deliver on the strategy's welcome central commitment to Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). This requires that persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others. To fully meet its promise to implement the UN CRPD, Ireland must ensure that its housing policy is inclusive and responsive to the needs of people with disabilities.

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Executive Summary

Overview

This social policy report², prepared jointly for the Citizens Information Board (CIB) and the Disability Federation of Ireland (DFI) aims to:

- Identify the specific accommodation difficulties experienced by different people with different types of disabilities;
- Document and analyse the experiences of people with disabilities, and those of the disability and advocacy organisations that support them, in accessing appropriate accommodation;
- Compare the experiences of those consulted with the commitments made in the National Housing Strategy for People with a Disability 2011-2016 (extended to 2021), related Local Authority Strategic Plans for Housing People with a Disability and social housing policy generally;
- Inform a policy action agenda based on the above, with particular reference to the implementation of the new National Housing Strategy for Disabled People 2022-2027. (This Strategy replaced the National Housing Strategy for People with a Disability 2011-2016 which had been extended to 2021.)

Outline of report

- The background to, context and objectives of the report are set out (Chapter One).
- The current accommodation situation of people with disabilities in Ireland is described (Chapter 2).
- The housing needs of people with disabilities as identified in annual assessments of social housing needs carried out by Local Authorities are described and the assessment system is evaluated. (Chapter 3).
- The broad policy context relevant to addressing the housing needs of people with disabilities is outlined and a synthesis of relevant research findings is provided (Chapter 4).
- Issues relevant to access to appropriate housing by people with disabilities which emerged from the research are identified and analysed. A number of illustrative case studies are provided (Chapter 5).
- The components of good practice in housing provision for people with disabilities are identified based on a discussion of the issues emerging from the analysis (Chapter 6).
- Finally, a policy action framework is set out to address the issues identified and a list of specific recommendations is provided (Chapter 7).

² While the research for the report was carried out during 2021, prior to the publication in 2022 of the new National Housing Strategy for Disabled People 2022-2027, findings were submitted for consideration to the Housing Agency during the consultation process for the new Strategy.



Main findings

The lived experience of people with disabilities

Since 2011, there have been some important advances in encouraging independent living and community participation by people with disabilities. The continued move away from congregated settings, both for people with disabilities and those with mental health challenges, notwithstanding a somewhat slow pace of implementation, has been an important positive development. However, feedback from support and advocacy providers indicates that in practice many disabled people find it difficult to find appropriate housing and supports for independent living.

- As well as being more likely to reside in communal establishments, people with disabilities and people with mental health difficulties feature disproportionately among the homeless population.
- Some people with disabilities can spend up to 10 years on the social housing waiting list.
- People who acquire a disability during adulthood can face particular challenges in remaining in their own homes, related both to difficulties in affording and getting the required home adaptation and getting the additional in-home supports required as a result of their disability.

- Some Local Authorities fail to take into account and cater for the particular needs of individuals with a disability by, in some instances, offering inappropriate options or choices.
- Disabled people continue, on some occasions, to be offered a house to live in, but without the personal assistant or social care supports needed to enable them to take up the housing offer.
- There are instances of an over-reliance by Local Authorities on types of accommodation provided through disability service providers that are effectively clusters of disability-specific units, as distinct from mainstream community-based living.

Implementation of 2011-2016 Strategy (extended to 2021)

The 2011-2016 Strategy (extended to 2021) clearly brought about some necessary improvements, including a somewhat more consistent approach across the country, new structures and processes at Local Authority level, including the Housing and Disability Steering Groups and Strategic Plans.

Important implementation structures at national level were also put in place, including the Housing Sub-Group, which is convened by the Housing Agency and has representation from the Department of Housing, Local Government and Heritage, the HSE, Local Authorities, Irish Council for Social Housing and various disability representative organisations.

Despite these individual improvements, however, the outgoing housing Strategy did not fully or successfully address the housing needs of people with disabilities in its implementation.

Role and operation of Local Authorities

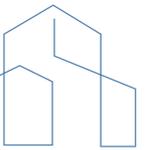
Local Authorities have primary responsibility for, and are central to, delivering housing to disabled people. However, the approach to date by Local Authorities has been somewhat uneven in how supportive they are in facilitating the application process; and in how proactive they are in communicating effectively with people with disabilities.

- There is a wide variation across Local Authorities with regard to the number and proportion of households identified as in need of social housing support on the basis of disability.
- The extent to which people with disabilities and their representatives have been and are involved in the development of strategic housing plans varies greatly, with some Local Authorities showing very positive approaches to participation while others are perceived as being somewhat weak in this regard.
- Local Authorities vary greatly in the manner in which they make information available and facilitate and enable social housing applications by people with disabilities – some Local Authorities proactively encourage and support applications, others are seen as presenting obstacles to engagement.

Housing needs assessment

Integrated needs assessment should be at the core of an appropriate housing response for disabled people. However, this falls short in practice.

- People with disabilities are faced with a system that is complex and difficult to navigate both in terms of establishing their eligibility for social housing support and in moving through the assessment process.
- There is a major difficulty with the current housing needs assessment system in that people who receive Housing Assistance Payment (HAP), Rent Supplement (RS) or who avail of the Rental Accommodation Scheme (RAS) are deemed to have their housing needs met, as are people on transfer housing lists – it is clear that the housing needs of many people with disabilities and people experiencing mental health difficulties are not adequately or equitably catered for by such provisions.
- In practice, many disabled people cannot avail of HAP, one of the key social housing mechanisms in recent years, as suitable accessible/adapted housing is not available on the private rental market.
- There is evidence from NGOs that some Local Authorities may be more stringent than others in how they apply eligibility criteria and in how they assess applicants with certain categories of disability or current living arrangements.



Inter-agency and Departmental collaboration

The following issues are highlighted in the report relating to inter-agency collaboration:

- While there is evidence of examples of good practice and innovation involving Local Authorities, the HSE and the voluntary sector, such cases are often more *ad hoc* and reliant on individual personalities, rather than on a systematic operating framework.
- There is evidence of ineffective coordination and collaboration between Local Authority staff and HSE staff, despite clear policy and guidance on the matter – many of the difficulties relating to coordination arise because of inadequate resources (staffing and other) provided to Local Authorities for this purpose.
- It is noted that the new 2022-2027 Strategy acknowledges the importance of collaboration between Local Authorities, Approved Housing Bodies and health and social services in providing an effective and coordinated housing with supports response. It re-emphasises the importance of strengthening and supporting coordination frameworks, building effective collaboration, aligning and simultaneously planning and allocating housing and support services, and the sharing of relevant information between agencies.
- While such collaboration at local level is vitally important, it is also necessary to ensure that a collaborative approach is adopted at national level with the Department of Housing, Local Government and Heritage taking a lead role but also involving the Department of Health and the Department of Children, Equality, Disability, Integration and Youth in a systematic and transparent collaborative process. For example, the implementation of the National Housing Strategy for Disabled People 2022-2027 should reflect and operate in tandem with the provisions of the National Disability Inclusion Strategy 2017-2021 (and its pending successor, Ireland's first UN CRPD Implementation Plan) and the Roadmap for Social Inclusion 2020 – 2025. It should also be aligned with and inform the government's Housing for All plan.

Funding and resources

Many of the barriers, difficulties and issues identified in the report are, to varying degrees, connected with the issue of inadequate funding and resources.

- A key problem is the lack of integration between, and coordinated planning of, the funding for accommodation and the funding for personal and in-home supports.
- Some Local Authorities do not have sufficient or adequately trained staff for the roles connected with managing the provision of accommodation for people with disabilities.
- The level of funding for housing adaptation grants, while increasing annually, has not yet returned to pre-austerity levels, and the maximum threshold has not been reviewed in more than a decade, despite escalating construction costs.

The new housing strategy, if it is to be successful, will require sufficient funding to deliver on its ambition.

Building regulations and planning

The report highlights the importance of high quality design elements, a lifetime adaptable housing approach and a commitment to universal design principles to ensure that new housing will meet a range of needs and to facilitate ageing in place. It also notes that despite many policy statements and aspirations about housing design and accessibility, people with disabilities continue

to experience problems with access to and potential adaptation of accommodation.

There are shortcomings in planning and building regulations, and, in particular, there is poor implementation and application of Part M (Section 3 Access and Use) of the Building Regulations 2010. Moreover, many organisations have also called for Part M to be reviewed and reformed, to ensure that fully wheelchair *liveable* accommodation is built.

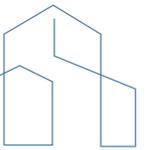
Data collection

There has been a gradual improvement in the level and amount of relevant data being recorded on the housing needs of people with disabilities. However, there are significant shortcomings in certain data available, especially at Local Authority level, relating for example to the length of time people with disabilities spend on the social housing waiting list and the reasons for same. There is only limited data on the performance of individual Local Authorities.

Good practice components in addressing the housing needs of disabled people

The good practice components necessary to address the housing needs of people with disabilities identified by the report are:

- ✓ Strategic development by central Government
- ✓ Robust management of strategic commitments
- ✓ Adequate, integrated and targeted funding



- ✓ Inter-Departmental co-ordination
- ✓ Collaborative structures at local level
- ✓ Assessment of need protocols and the implementation and monitoring of same
- ✓ The implementation in practice of a person-centred approach and a related personalised budgets approach, with individually-tailored housing and support plans
- ✓ The building of integrated communities fully inclusive of people with disabilities
- ✓ Easy access to information, advice and independent advocacy, and
- ✓ An integrated case management approach.

Positively, the new National Housing Strategy for Disabled People 2022-2027 includes many of these components of good practice. However, in order to be meaningful and effective, clear implementation protocols and adequate resources, including personnel must be provided to deliver on the strategy's ambition. The Implementation Plan and its delivery, as well as the strengthened reporting processes, will be critical in addressing the issues outlined in this report.

A rights-based perspective

The implementation of the National Housing Strategy for Disabled People 2022-2027 will need to be accompanied by additional and dedicated funding commensurate with the human, material and financial resources required to deliver on its goals. Innovative

approaches to inter-agency collaboration at both national and local levels will also be centrally important. Crucially, a stronger acknowledgement of an equality and rights-based approach to meeting the housing needs of disabled people will be required. Of particular importance here is Article 19 of the UN Convention on the Rights of Persons with Disabilities which requires that persons with disabilities have the right to choose their place of residence and where and with whom they live on an equal basis with others, are not obliged to live in a particular living arrangement and have access to a range of in-home, residential and other community support services to support living and inclusion in the community. It is very welcome to see the strong and frequent references to the UN CRPD in the new strategy.

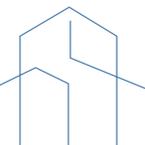
Also, centrally relevant is the legislative responsibility of public bodies in Ireland under Section 42 of the Irish Human Rights and Equality Act 2014 to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans.

Framework for identifying and addressing the issues identified

The report sets out a Framework (overleaf) which identifies the accommodation needs of people with disabilities from the perspective of organisations supporting them in securing appropriate housing and outlines a range of measures to address these issues.

Framework to address the accommodation needs of people with disabilities

Issue	Difficulties	Addressing the Issues
<p>Shortage of suitable accommodation</p>	<p>Poor supply in all categories; Poor application of building standards; Restricted options; Disincentive effect of poor supply; Difficulty in accessing private-rented sector; Cost of rental.</p>	<p>Improved application of a design for all approach; Enforcement of building regulations; Dedicated funding streams; More stringent social housing target-setting; Funding of innovative approaches to widening supply; Incentives for landlords to adapt properties; A quota of new houses to be built to wheelchair liveable universal design standards.</p>
<p>Housing needs assessment and establishing eligibility</p>	<p>Complex and difficult system; Procedures vary as between local authorities; Varying degrees of stringency; Repetitive demands for information; Lack of inclusivity; Long social housing waiting lists; Danger of people opting out due to demands of the process and/or length of time waiting; People getting knocked off the waiting lists due to short timeframe for confirming or re-confirming eligibility; Inadequate appeals mechanisms.</p>	<p>Better streamlining and standardisation of processes across the areas of housing, health and social protection; Transparency regarding eligibility criteria; Inter-agency coordination; Advocacy support; Inclusive person-centred assessment of need; More disability awareness training for all public services staff engaging with people with disabilities and people with mental health difficulties.</p>
<p>Planning for predictable medium to long-term accommodation need. Provision for changed housing and support needs</p>	<p>System not effectively coping with evolving and changing needs of individuals, resulting in sudden and often inappropriate or retrograde accommodation options being implemented; Danger of readmission into residential care or being inappropriately 'placed' in a nursing home; Ageing in place not prioritised in policy.</p>	<p>Continuum of provision to meet the wide range of needs; New models of provision; Long-term planning to anticipate changing housing and support needs; Change from crisis mode of provision; Enhanced partnership with the NGO sector; Resources allocated in accordance with level of need.</p>



Issue	Difficulties	Addressing the Issues
Offers of inappropriate or unsuitable accommodation	Failure to take account of particular needs; Poor differentiation between the needs of differing individuals and differing disabilities; Poor understanding or awareness of disability among some Local Authority staff; Environmental matters disregarded; Little account taken of location, family and social networks; Pressure on individuals to accept an inappropriate offer of accommodation because of fear of being removed from the waiting list.	Personal circumstances, preferences and needs to be taken into account; Holistic and integration-oriented approaches; Recognition of environmental and locational issues; Recognition of importance of social, family and community networks.
Clustering of accommodation units for people with disabilities	Over-reliance on disability-specific centres of accommodation; Poor mainstreaming and integration into the community; Problems in reassigning support staff from institutional locations to community-located settings.	Consultation and collaborative working with community and disability organisations; Move towards greater mainstreaming and integration within social housing provision; A stronger focus on what a person-centred approach means in practice.
Inadequate housing support provision	Accommodation offered without the necessary supports; Difficulty in accessing Personal Assistant supports; Families not adequately supported to facilitate a move by a member with a disability to independent living.	Provision for Direct Payments to individuals; Uniform provision and entitlement to PA supports; Stronger inter-agency collaboration. Introduction of a 'Cost of Disability' payment.
Family concerns and resistance as a barrier	Family members' concerns as a barrier to facilitating move by a person with a disability into independent accommodation; Agency staff reluctance to go against family wishes; No access by disabled person to an independent advocate.	Recognition of rights and entitlements of individual with a disability; Provision of independent advocacy support; Provision of adequate accommodation supports; Staff training; Better supports for family members acting in a caring/support role.

Issue	Difficulties	Addressing the Issues
<p>Poor inter-agency collaboration</p>	<p>Insufficient coordination between local authorities, HSE and voluntary organisations; Lack of clarity regarding roles and responsibilities; Lack of continuity and integration between agencies' interactions with clients; Poor levels of cooperation in some instances.</p>	<p>Clarification of roles, responsibilities and inter-agency collaboration mechanisms; Engagement from all agencies at a sufficiently senior level; Staff training; Policies and processes to monitor and ensure effective client-centred actions; Clarity regarding funding streams and sufficient funding; Development of an appropriate organisational ethos for working with persons with disabilities.</p>
<p>Information provision</p>	<p>Difficult to access information on housing options, assessment criteria, progress of applications; Complex and difficult-to-understand processes; Variations in information and approaches as between locations; Poor levels of transparency and data regarding performance at a local level.</p>	<p>Provision of adequate, comprehensive, and accessible information; Elimination of inter-agency and inter-regional discrepancies and variations; Publication of performance data; Setting of clear, measurable delivery targets to monitor progress and publication of same.</p>
<p>Agency-applicant communications</p>	<p>Problematic in many instances; Poor recognition and acceptance of challenges facing applicants in dealing with bureaucratic administrative information and communications; Danger of applications being rejected due to the lack of disability-sensitive engagement with applicants; Communications filtered or diverted by family.</p>	<p>Critical reassessment of information-giving processes and content; Development of communications processes and channels that are sensitive to the challenges faced by individuals; Sensitivity in decision-making to the communication and support needs of people with disabilities; Involvement of advocacy supports.</p>
<p>Staffing and organisational issues</p>	<p>Inadequate staffing provision; Staff turnover; Lack of staff training in disability awareness, needs assessment; Varied organisational culture regarding disabled people; Risk averse tendency by agencies; Mixed performance in consultation processes; Mixed impact of Housing and Disability Steering Groups.</p>	<p>Adequate staffing levels and commensurate funding; Staff training and awareness building; Reviews of organisational culture; Development and application of processes that are genuinely participative, inclusive and disability sensitive. Standardisation of best practice nationwide; Monitoring and related standardisation of Housing and Disability Steering Groups.</p>



Issue	Difficulties	Addressing the Issues
Difficulties in sustaining a tenancy	'Failed' tenancies; Tenancies inadequate or inflexible for evolving needs; Impact of 'failed' tenancies on future social housing offers; Poor tenancy support mechanisms.	Provision of adequate tenancy maintenance support mechanisms; Actions to ensure that 'failed' tenancies are not used as a reason for future barriers to accommodation provision; Application of building standards that are more conducive to changes in tenant needs.
Private rented sector and privately owned accommodation issues	Difficulty of access to private rented sector; Difficulties in accessing adaptation grants; Difficulty in negotiating appropriate tenancy arrangements; Homeowners with acquired disability experiencing difficulty in navigating means testing; Barriers to getting mortgage protection insurance.	Clarity and transparency in establishing eligibility; Effective mechanisms for supporting private-sector providers entering or remaining in the disability housing provision sector; Encouragement and enabling of innovative approaches aimed at involving the private sector; Reform of means-test for housing adaptations; Incentivising the private rented sector to carry out adaptations; Structured responses to mortgage protection insurance issues.
HIQA inspections, recommendations and requirements	Negative impact of HIQA inspections and requirements on residents in community-group homes; Institutionalisation of community-based accommodation units.	Clarity regarding the requirements identified by HIQA; Resources to organisations to enable them to meet HIQA requirements; Recognition of the need to differentiate between institutional settings and various types of group home settings.
Difficulties for people with mental health difficulties	Unsuitable location of accommodation offered; Poor access to facilities, services and public transport; Problems regarding the nature of the accommodation provided; Tenancy sustainment issues.	Need to give full consideration to individual needs; Greater involvement of support staff; Tenancy sustainment supports.
Funding	Lack of integrated or sufficient funding streams for housing with supports; Inadequate Housing Adaptation Grants.	An integrated and significantly increased cross-Departmental budget for housing and related supports for people with a disability/mental health difficulty; An increased budgetary allocation for Housing Adaptation Grants and reform of maximum grant and means test.

Policy recommendations

Based on the above framework, a number of policy recommendations are made in the report under a range of headings:

- Implementing the National Housing Strategy for Disabled People 2022-2027
- Mainstreaming disability housing policy
- A 'Whole of Government' approach
- Increased social housing delivery
- Life-time adaptable housing
- The pathway to housing for people with a disability
- Capacity-building for Approved Housing Bodies
- Housing Standards
- Building integrated communities
- House adaptations
- Assessment of housing need
- Private rented housing sector

Implementing the National Housing Strategy for Disabled People 2022-2027

The new Strategy sets out a clear policy framework for addressing many of the issues identified in this report. It includes principles, objectives and planned actions for meeting the accommodation needs of disabled people

and highlights the need for better and more integrated communication systems and protocols. While this is very welcome, it is necessary to re-emphasise the importance of applying special focus and attention to those areas in which the previous Strategy failed to deliver adequate results. There is a real need for robust and even aggressive implementation, if the new Strategy is to be successful.

Specific areas that need to be addressed in the implementation of the Strategy include:

- There should be clarity about which aspects of the Strategy should be driven by Government departments at central level and which aspects are primarily the responsibility of Local Authorities.
- A clear and standardised *modus operandi* for all Housing and Disability Steering Groups needs to be put in place, with effective monitoring of performance.
- A clear communications plan should be developed with the aim of making people with disabilities aware of their housing rights and entitlements, including a page on each Local Authority website providing clear easy to read accessible information, and a process map for accessing housing and related supports.



- Provision should be made for sufficient disability-awareness training (including the housing and support implications of various types of disability) for all staff working on disability and housing matters (including front office staff dealing with applicants, managers, architects and planners) – funding to Local Authorities for such training has been inadequate.
- There should be a designated, specific and additional co-ordinating role on housing and disability in each Local Authority, modelled on, and learning from, the Mental Health Housing Coordinators and Age Friendly Housing Technical Advisor roles. Additional resources should be provided to fund this– these roles should not be ‘tagged on’ to existing roles.
- There should be stronger accountability mechanisms in respect of local delivery of social housing for disabled people and people with mental health difficulties, including:
 - Detailed annual reporting by Local Authorities related to agreed targets in respect of implementing the new Strategy
 - Information published on each Local Authority website on annual delivery, number of people on waiting list, length of time that people are on the waiting list
- There should be a regular, consistent and systematic practice of coordination and collaborative planning at local level across agencies at sufficiently senior level (in particular Local Authorities and the HSE) in order to overcome blockages and resolve problems. This is necessary in order to ensure that health and social support packages are available and aligned with housing offers coming on stream.³
- An effective and transparent mechanism is required to ensure that there is effective and systematic collaboration between relevant Departments, with the Department of Housing, Local Government and Heritage taking a lead role and involving the Department of Health and the Department of Children, Equality, Disability, Integration and Youth. The important supportive role of the Housing Agency should be retained and strengthened.

³ This should build on the HSE Guidance Document, Supporting People with Disabilities to access Appropriate Housing in the Community, <https://www.hse.ie/eng/services/list/4/disability/congregatedsettings/guidancedoconhousingoptions.pdf>

Chapter One

Background and Focus

Introduction

The focus of this social policy report (prepared jointly by the Citizens Information Board (CIB) and Disability Federation of Ireland (DFI)) is on the housing and accommodation⁴ needs of people with disabilities and their families, as identified by non-governmental organisations (NGOs) working in the disability field and/or providing independent information, advice and advocacy.

CIB has a particular role in developing information, advice and advocacy services for people with disabilities and is also the agency responsible for the National Advocacy Service for People with Disabilities (NAS). One of the statutory functions of CIB is to provide policy feedback to Government based on the experience of users and providers of CIB services. DFI works to bring about policy change based on reflecting the voice of the disability movement and strengthening the voice of people with disabilities in the policy-making process.

DFI, through its member organisations and its own work at national, county and community level, has a comprehensive understanding of the housing challenges faced by people with disabilities. The level and extent to which

people with disabilities face challenges and difficulties in accessing accommodation is a major issue on an ongoing basis identified by NAS and by Citizens Information Services (CISs). Some of the work of NAS involves helping people to assert their right to independent living and to find appropriate accommodation accordingly. There were over 60,000 queries on housing to CISs in 2021. Some of these concern people with disabilities seeking appropriate accommodation or looking for assistance with getting house adaptations to help them manage in their own homes following an acquired disability. A need for a housing adaptation also arises at times for families who have a child born with a disability.

Continuing a trend in recent years, the most significant issues worked on by NAS advocates were housing and accommodation, accounting for 50% of representative advocacy cases.⁵ The cases included those experiencing homelessness or those at risk of homelessness, those in inappropriate residential placements⁶, and people in the process of moving out from large residential centres to live in the community. Rent arrears and social housing waiting list issues also featured regularly in NAS casework.

⁴ The terms housing and accommodation are used interchangeably throughout the report in order to reflect the complexity of need that exists across all categories of people with disabilities.

⁵ <https://advocacy.ie/app/uploads/2020/12/NAS-AR-2019-FINAL-WEB.pdf>

⁶ Inappropriate residential placements refer to situations where a person is living in a type of accommodation that is not suitable for their needs or wishes and does not allow them to participate in their communities.



The Right Living Space (jointly prepared by CIB (then Comhairle) and DFI)⁷, published in 2007, proposed a range of components of a National Housing Strategy for People with a Disability. It was envisaged that this strategy could result in significant development and new practice in the area.

While clearly much has changed since 2007 and while the first National Housing Strategy for People with a Disability⁸ was put in place in 2011 (superseded by a new national strategy published in 2022⁹), there remain significant difficulties for people with disabilities in accessing accommodation to meet their specific needs. The level and extent to which people with disabilities face challenges and difficulties in accessing accommodation is a major issue on an ongoing basis as is evidenced in feedback from CISs and NAS, in DFI policy statements and in various research reports and policy submissions by disability organisations. There is a clear need for further engagement with the matter at this juncture and particularly in the context of the publication of the National Housing Strategy for Disabled People 2022 – 2027. Both CIB and the DFI made submissions to the Housing Agency on the development of this new strategy.¹⁰

Objectives of Report

The specific objectives of the report are to:

- 1) Identify the specific accommodation difficulties currently being experienced by different people with different types of disabilities
- 2) Document and analyse the experiences of people with disabilities, and those of the disability and advocacy organisations that support them in accessing appropriate accommodation;
- 3) Compare the experiences of those consulted with the commitments made in the first National Housing Strategy for People with a Disability and related Local Authority Strategic Plans and social housing policy generally;
- 4) Identify a policy action agenda based on the above, with particular reference to the implementation of the new National Housing Strategy for Disabled People 2022-2027.

⁷ *The Right Living Space*, <https://www.disability-federation.ie/assets/files/legacy/Full%20Report.pdf>

⁸ <https://www.gov.ie/en/publication/a970c-national-housing-strategy-for-people-with-a-disability-2011-2016/>

⁹ National Housing Strategy for Disabled People 2022 – 2027 <https://www.gov.ie/en/publication/60d76-national-housing-strategy-for-disabled-people-2022-2027/#:~:text=The%20National%20Housing%20Strategy%20for,Department%20of%20Health>

¹⁰ https://www.citizensinformationboard.ie/downloads/social_policy/submissions2021/National-Disability-Housing-Strategy-CIB-052020.pdf

<https://www.disability-federation.ie/publications/dfi-submission-to-consultation-on-new-national-hou/>

Methodology

The following research methods were used to gain as extensive and accurate a picture as possible of the situation regarding how the accommodation needs of people with disabilities are (or are not) being met:

- 1) Consultation meetings with National Advocacy Service for People with Disabilities (NAS) staff and with Disability Federation of Ireland staff (virtual online meetings)
- 2) Attendance by researcher at DFI consultation with member organisations in relation to the DFI Submission on the new strategy
- 3) Analysis of Case Studies submitted by NAS and DFI staff members
- 4) Responses from Disability Organisations (members of DFI) to a Consultation Questionnaire
- 5) Telephone interviews with a number of self-selected persons with a disability and/or family members
- 6) Analysis of census data and other sources of housing related data from government departments and agencies
- 7) Analysis of reports and studies relevant to accommodation and disability

These actions were carried out during the first half of 2021.

Outline of Report

The report contains seven chapters.

Chapter One has set out the context and main objectives of the report. Chapter Two describes the current accommodation situation of people with disabilities in Ireland. Chapter Three focuses on housing needs of people with disabilities as identified in annual assessments of social housing needs carried out by Local Authorities. Chapter Four outlines the broad policy context relevant to addressing the housing needs of people with disabilities and provides a synthesis of relevant research findings. Chapter Five outlines the main issues relevant to housing and people with disabilities which emerged from the consultation and analysis carried out for this report. It includes a number of illustrative case studies. Chapter Six provides a summary of the main points and a synthesis of issues arising. Finally, Chapter Seven provides a policy action framework arising from the analysis of the issues identified. The chapter also includes a list of specific recommendations.



Chapter Two

The Accommodation Situation of People with Disabilities

Number of people with disabilities

According to Census 2016¹¹ there were 643,131 people who stated that they had a disability, accounting for 13.5% of the population. The most common type of disability reported is 'other disability, including chronic illness' (296,783). The next most common is 'a condition that substantially limits one or more basic physical activities' (262,818). 123,515 people reported having had a psychological or emotional condition. 'Deafness or a serious hearing impairment' was reported by 103,676 persons in 2016 and 'blindness or a serious vision impairment' by 54,810 people. A total of 66,611 persons (1.4% of the population) were identified as having an intellectual disability in 2016, 8,902 higher than in 2011.

Disability rates increase sharply above the age of 70 years and the number of people aged over 65 years with a disability increased by 20,319 between 2011 and 2016. Some of this is almost certainly due to an ageing population. As a result of population ageing and people with disabilities living longer, the overall population of people

with disabilities in Ireland is likely to continue to increase significantly. The NDA¹² has estimated that the number of people with a disability will increase by approximately 20% by 2026. One-third of this increase is due to the increased size of the population and two-thirds of the increase is due to the ageing of the population.

The number of people with dementia in Ireland is estimated to be 55,000. This number is expected to grow at an average rate of 3.6 per cent per year over the next thirty years. By 2036, the number of people with dementia in the country will have doubled and by 2046, the number will have almost trebled.¹³

According to the Health Research Board's National Ability Supports System (NASS) database for 2020¹⁴, 21% of those recorded on NASS were in receipt of a residential service. A total of 9,371 (26%) service users were living in private accommodation that was owner occupied and 2,723 (7%) were living in rented accommodation (1,833 in county council/public authority/service provider accommodation) and 890 renting on the open market. A total of 7,621 (21%) were residing in a residential setting.¹⁵

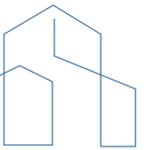
¹¹ There is likely to be a significant shift in these trends when Census 2022 data is analysed.

¹² NDA Factsheet 1: Disability Statistics, <http://nda.ie/resources/factsheets/nda-factsheet-1-disability-statistics-briefing-information.pdf>

¹³ Prevalence and Projections of Dementia in Ireland, 2011 – 2046 https://www.genio.ie/system/files/publications/Dementia_Prevalence_2011_2046.pdf

¹⁴ National Ability Supports System (NASS) 2020 Database, <https://www.hrb.ie/data-collections-evidence/disability-service-use-and-need/latest-data/>

¹⁵ It should be noted that this data is not complete as some service providers were unable to return data for 2020 due to the fact that their IT systems had not yet been updated to provide this information.



In considering the numbers of people with a disability in the population and their housing needs, it is very important to 'unpack' the generic terms 'people with disabilities' or 'disabled people' as commonly used. Clearly people with disabilities are a very diverse population with very varied housing needs. The housing needs of many people with a physical or sensory disability (who can live independently with appropriate technology and personal assistance) are clearly very different than those of many people with an intellectual disability or those with an acquired brain injury or those with dementia who may need decision-making support and who require a range of in-home and community supports in order to live independently. This crucially important distinction is frequently lost in current policy discourse on disability matters.

Also, the full inclusion of people with an intellectual disability in society requires a fundamental dismantling of the generic label 'intellectual disability' and a focus on individuals with specific housing support needs to enable them to live independently or semi-independently.

General accommodation situation

Census 2016 gives the total population of people with disabilities in the State as 643,131. The vast majority, 585,639 or 92.9% lived in *private accommodation*. A further 44,531 (7%) lived in a *communal establishment*, while 1,871 (0.3%) were categorised as *homeless*.¹⁶

Table 1.
Persons with disabilities by accommodation settings 2016

	Number 2016	Percentage 2016
Private Households	585,639	92.9
Communal Establishments	44,531	7.0
Homeless	1,871	0.3

Source: CSO. Census 2016

¹⁶ The number categorised as homeless includes to some extent people who were enumerated in the private accommodation or communal establishment numbers.

In terms of definitions, as used by the CSO, a *private household* is defined as one or more persons living at the same address with common housekeeping arrangements, such as sharing meals together or sharing a common living room. A *communal establishment* is defined as an establishment which provides managed residential accommodation. The term *homelessness* denotes sleeping rough or staying in temporary accommodation because one has nowhere else to go and is generally unable to provide accommodation

from their own resources. These definitions may vary from those used by other agencies.

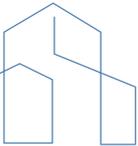
People with a disability in private accommodation

As noted above, there were 585,639 persons with a disability living in *private accommodation* according to Census 2016. Almost one-third (30.3%) of these people were designated as the head of a family unit.

Table 2.
Persons with disabilities: status within family unit; private accommodation 2016

	Number	Percentage
Head of family unit	177,181	30.3
Spouse	119,419	20.4
Child	124,713	21.3
Other non-family or relative	164,326	28.1
Total	585,639	100

Source: CSO. Census 2016



The high proportion of persons designated as *Other* in Table 2 can, it is suggested¹⁷ be explained by the fact that many persons with disabilities cohabit in designated centres in the form of community-based housing which is often enumerated as *Private households* in the census data. It is estimated that over 6,000 persons with disabilities live in HSE-designated centres of ten or less residents which are therefore not classified as congregated settings.

Of the 124,713 persons with a disability who are categorised as a *child* and who live in private households, 28,935 (23%) are aged 25 years or over and are categorised as an *adult child*.

A total of 112,904 disabled persons, representing 19.3 per cent of the total disabled population, lived alone in private households in 2016.

There were 61,756 disabled persons aged 65 and over living alone in private households. Almost twice as many were female as were male. There were 128,369 persons with a disability aged 65 and over who lived with others.

People with a disability who were living in private accommodation can be divided according to the nature of their occupancy. Table 3 provides a breakdown by category.

Table 3.
Persons with disabilities: occupancy type; private accommodation, 2016

Occupancy Type	Percentage
Owner occupied with loan or mortgage	24.7%
Owner occupied without loan or mortgage	44.1%
Rented from private landlord	12.4%
Rented from a local authority	13.4%
Rented from a voluntary body	1.6%
Occupied free of rent	1.7%

Source: NDA/Census 2016

¹⁷ See NDA (2020), NDA Factsheet 5: Where do Persons with Disabilities Live? <http://nda.ie/resources/factsheets/nda-factsheet-5-housing/nda-factsheet-5-housing.pdf>

The proportion living in accommodation that is '*Owner occupied without loan or mortgage*' is likely to reflect the prevalence of persons with a disability amongst the older segments of the population.

The share of persons with disabilities renting from Local Authorities (13.4%) is considerably higher than that of the general population (8.4%). The share renting from private landlords (12.4%), on the other hand, is considerably lower than that of the general population (17.8%). While this may be a reflection of the lower income levels of persons with disabilities, it may also reflect discrimination faced by them in securing private-rented accommodation.

While the proportion living in accommodation that is '*Rented from a voluntary body*' (1.6%) appears relatively low, it should be noted that the comparative figure for the general population is even lower, at 0.8%.

People with a disability in communal establishments

A total of 44,531 people with disabilities were enumerated in communal establishments in Census 2016, comprising 19,015 males and 25,516 females. This represented 6.9 per cent of all disabled persons.

Of these, 31,033 were people aged 65 and over. Of these, 20,702 were in nursing homes and 6,866 in hospital. Other types of establishment, including religious institutions, shelters and refuges accounted for 3,465 persons aged 65 and over.

Less than one per cent (0.8%) of disabled children (483 persons) aged 0-14 lived in a communal establishment and 13,015 disabled persons (29.2%) were aged from 15 to 64 years.

By contrast, nearly 14 per cent (13.8%) of disabled persons aged 65 and over were living in communal establishments, compared with 7.8 per cent of non-disabled persons in the same age group.

Table 4 shows the distribution of persons with a disability by type of communal establishment.



Table 4.

Persons with disabilities in Communal Establishments by establishment type 2016

Establishment Type	No. of Occupants with a Disability	% of occupants by establishment type
Nursing or children's homes	25,356	56.9
Hospital	9,515	21.4
Religious community	1,548	3.5
Shelter or refuge	1,920	4.3
Prison	650	1.5
Educational establishment	726	1.6
Hotel	3,690	8.3
Guest house, boarding house, B&B	500	1.1
Tourist/Youth hostel or campsite	251	0.6
Defence establishment	25	-
Civilian ships, boats and barges	7	-
Other types of establishments	343	0.8
Total	44,531	100

Source: NDA/Census 2016

The inclusion of settings such as hotels and B&Bs in the categorisation confuses the picture to some extent. However, the numbers of people with disabilities who were resident in such settings is in the region of 5,000 or 10% of the total number in communal establishments.

The distribution by age of people with disabilities who live in the various categories of communal establishment provides another perspective (Table 5).

By far the most common type of communal establishment for persons with disabilities

was *nursing and children's homes*. It should be noted that the CSO does not publish separate data for 'nursing homes and 'children's homes' individually. However, as can be seen in Table 5, only 65 persons aged between 0 and 14 years were resident in establishments categorised as *nursing and children's homes* in 2016, with a further 271 aged between 15 and 24 years of age. This would indicate that in the region of 150 persons were of an age that would be appropriate for accommodation in *children's homes*.

Table 5.
Persons with disabilities: occupancy by age group – communal establishments 2016

Age Group	Establishment Type ¹⁸			Total Number by age group	as % of all age groups
	Hospitals	Nursing and Children's Homes	Other Communal Settings ¹⁹		
65 years and over	6,866	20,702	3,465	31,033	69.7%
45 to 64 years	1,573	3,113	2,407	7,093	15.9%
25 to 44 years	728	1,205	2,292	4,225	9.5%
15 to 24 years	209	271	1,217	1,697	3.8%
0 to 14 years	139	65	279	483	1.1%
Total by type	9,515	25,356	9,660	44,531	100%
Type as % of overall total	21.4%	56.9%	21.7%	100%	

Source: Census 2016

¹⁸ There is no separate category listed for residential facilities for people with a disability.

¹⁹ Other communal establishments include religious communities, shelters, prisons and educational institutions.



The distribution across age groups for the *nursing homes and children's homes* category (as a percentage of all communal establishments) ranged from 67% for people aged 65 and over to under 20% for the two youngest age groups. The distribution across age groups for residency in a hospital was more even with all age groups being between 12% and 29%.

Persons with disabilities in designated centres

According to data from the Health Information and Quality Authority (HIQA)²⁰ there were 1,378 designated centres for persons with disabilities in the State with accommodation for a maximum occupancy of 9,094 residents, at the end of July 2021.

While these designated centres for persons with disabilities offered, in the main, occupancy for up to 10 people, 271 did have maximum occupancies of between 10 and 39 persons, with a combined total maximum occupancy of almost 4,000 persons. As noted above, the NASS 2020 Database indicates that there were 7,621 people with disabilities residing in a residential setting.

The HSE definition of a congregated setting is of 10 or more persons with a disability living together in a single living unit or in smaller homes but in a campus-style setting.

This would suggest that there are in the region of 5,000 persons with a disability living in designated centres of less than 10 people. These units would not be classified as congregated settings and may have been enumerated as *private households* in the census.

The fact that some younger people with disabilities are inappropriately placed in a nursing home because they could not access the support which would enable them to live in their own homes in the community has been regularly highlighted by DFI²¹ and has been the subject of a recent Ombudsman's Report which estimated that the number of people in such circumstances was more than 1,300.²²

Homelessness

As well as being more likely to reside in communal establishments, persons with disabilities are also more likely to be homeless. While 0.14% of the general population were homeless in 2016, this figure stood at 0.3% for persons with disabilities.

Table 6 provides a breakdown of the number of persons with disabilities who were recorded as homeless in 2016, by disability type. Note that some persons classed as homeless would have been listed under more than one disability type. Persons with *psychological or emotional conditions* and persons with *other disabilities, including chronic illness* were most highly represented (at over 44% each).

²⁰ HIQA Disability Register, https://www.hiqa.ie/centre/export/disability_register.csv?_format=csv Accessed 10/08/2021

²¹ Pierce, M., Kilcullen, S. & Duffy, M. (2018) The situation of younger people with disabilities living in nursing homes in Ireland. DFI and DCU. <https://www.disability-federation.ie/publications/plain-english-version-the-situation-of-younger-people/>

²² Ombudsman's Report, Wasted Lives, <https://www.ombudsman.ie/publications/reports/wasted-lives/OMBWastedLives2021.pdf>

Table 6.
Homeless persons with disabilities by disability type 2016

Disability Type	No. of persons	% of persons
Blindness or a serious vision impairment	158	8.4%
Deafness or a serious hearing impairment	131	7.0%
A condition that substantially limits one or more basic physical activities	581	31.0%
An intellectual disability	213	5.3%
Difficulty in learning, remembering or concentrating	621	33.2%
Psychological or emotional condition	825	44.1%
Other disability, including chronic illness	840	44.9%
Difficulty in dressing, bathing, or getting around inside the home	246	13.1%
Difficulty in going outside home alone	362	19.3%
Difficulty in working or attending school/college	619	33.1%
Difficulty in participating in other activities	509	27.2%
Total persons with a disability	1,871*	-

* Some persons will have had more than one type of disability

Source: Census 2016

There was a total of 6,906 persons in the general population enumerated as homeless in the 2016 Census. Persons with a disability made up a considerable proportion of that number at 27%. This compares with the

proportion of persons with disabilities in the total population of the State which is 13.5%.

The next chapter outlines the available data regarding people with disabilities who are seeking social housing support.



Chapter Three

Identifying the Social Housing Needs of People with Disabilities

People with disabilities assessed as in need of social housing support

There were 5,057 households assessed by local authorities as requiring social housing on the basis of disability in 2020. This compares with a figure of 5,319 for 2019 (see Table 7). Physical disability was the main need for social housing support in 1,493 cases, down from 1,731 in 2019. The requirements of persons with a disability in this category for suitable, modified housing are generally not met by the typical social housing unit which is a semi-detached house where the bedrooms and bathroom are all upstairs.

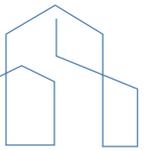
While the number assessed as in need of social housing support based on disability decreased over the 2018 to 2020 period, the percentage of the total number in need that is attributable to disability increased from 7.1% to 8.2%. Also, the percentage decrease for people with disabilities between 2019 and 2020 was half that for non-disabled people (4.9% vs 9.9%),

Table 7.
Number of Households on Social Housing Waiting Lists on Basis of Disability 2018 - 2020

Main Need for Social Housing Support	2018	2019	2020
Physical Disability	1,696	1,731	1,493
Mental Health Disability	1,522	1,603	1,550
Intellectual Disability	1,474	1,550	1,597
Sensory Disability	361	380	362
Other form of Disability	42	55	55
Total Need based on Disability	5,095	5,319	5,057
Total Social Housing Need	71,858	68,693	61,880
Disability as % of Total Need	7.1	7.7	8.2

Source: The Housing Agency: Summary of Social Housing Assessments 2020²³

²³Summary of Social Housing Assessments 2020, <https://www.housingagency.ie/publications/summary-social-housing-assessments-2020>



There is also a 'medical or compassionate grounds' category which may include some people with a disability. The number in this category in 2020 was 743.

It should be noted that the numbers provided in the Summary of Social Housing Assessments refer to households, as opposed to persons. The households can comprise one or more persons, and can include people who are homeless, in institutions, emergency accommodation, or hostels (10.5% in 2020), as well as people living with parents (24%), or relatives/friends (10.4%). Almost half (45.6%) of all those on the waiting lists were in private rented accommodation. Just over half of all households assessed as in need of social housing support in 2020 comprised one adult. The Summary of Social Housing Assessments (SSHA) does not provide specific data regarding the status of applicants with a disability.

There is a major difficulty with the current housing needs assessment system in that people who receive HAP, Rent Supplement or RAS or people on the transfer housing lists are deemed to have their housing needs met and are, therefore, not included in the needs assessment figures. It would be informative and critically important to know what impact the inclusion of these individuals would have on numbers if they were actually included in the assessment.

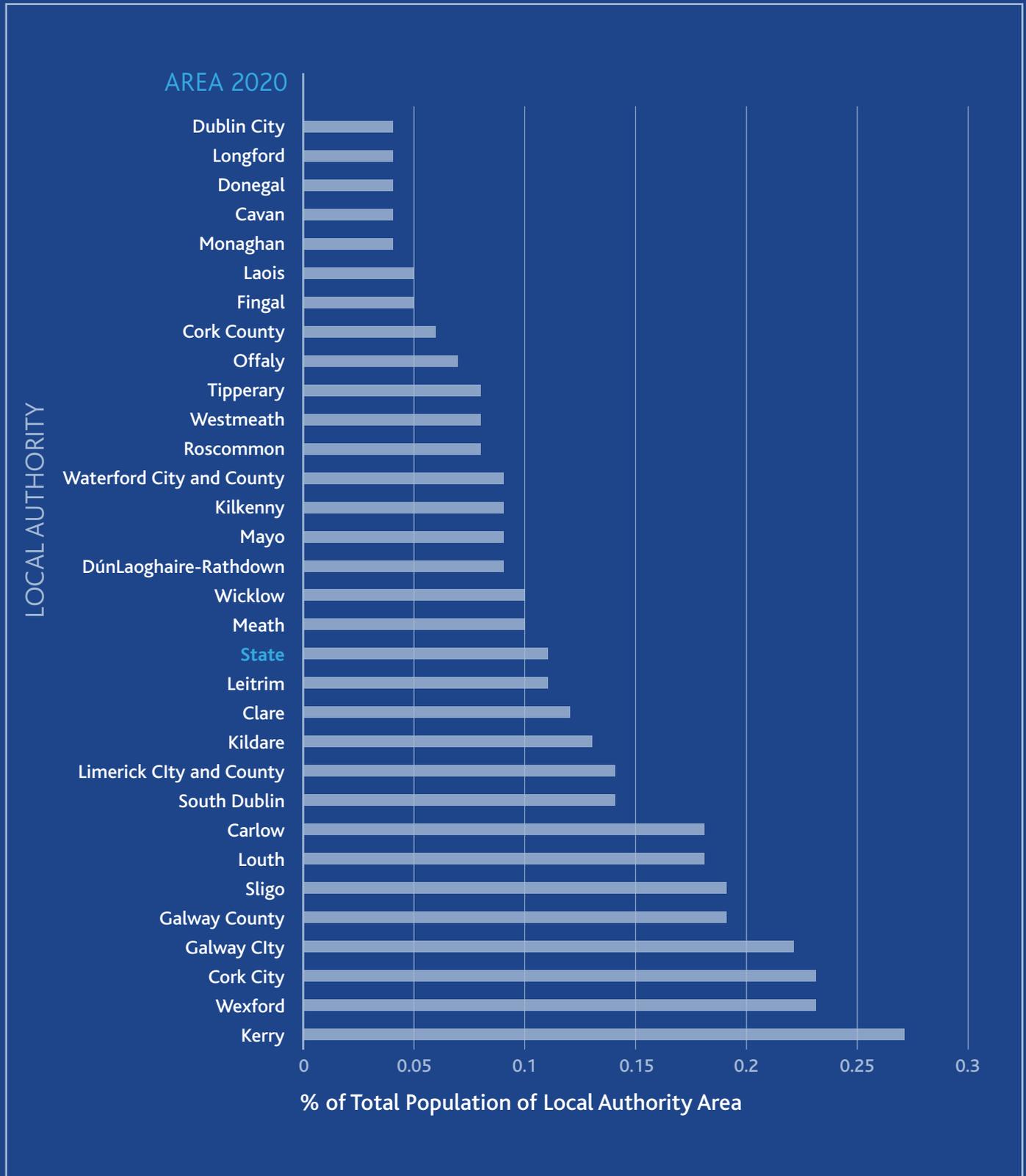
In 2020, 27.2% of those assessed as in need of social housing support had been on the waiting list for more than 7 years, while 11.2% had been on it for 5 to 7 years. The SSHA does not provide length of time on the waiting list specifically for applicants with a disability. However, data from one Local Authority (Galway County Council) interactive housing report²⁴ shows that more than 80 people with disabilities have been on the housing list for 11-15 years and over 210 people have been waiting for 5-10 years (more than 20% of those waiting this long).

Need for social housing support by Local Authority

The Summary of Social Housing Assessments 2020 shows a wide variation across Local Authorities with regard to the number and proportion of households in need of social housing support on the basis of disability. The numeric variation between local authorities can, of course, be explained in terms of the difference in total population as between the areas concerned. However, when the total population is used as a reference point, the variation remains noticeably distinct. Chart 1 (next page) presents the variation between Local Authorities visually, allowing for comparison on the basis of the number of households assessed based on disability as a percentage of the total population of each Local Authority.

²⁴<http://www.galway.ie/en/services/housing/demand/>

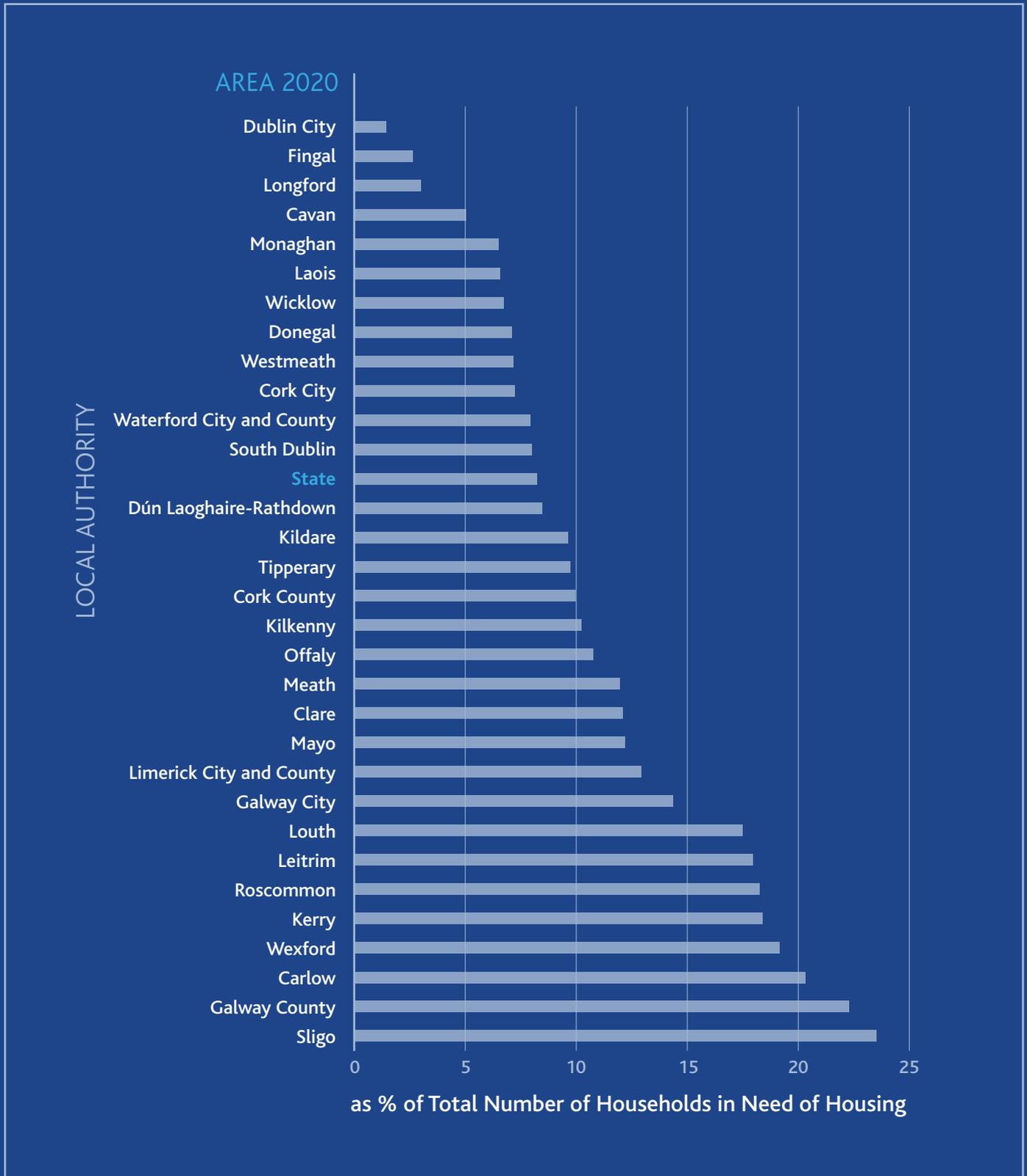
Chart 1. Number of Households on Social Housing Waiting Lists on the basis of Disability as % of Total Population, by Local Authority.



Sources: CSO Census 2016; The Housing Agency; Summary of Social Housing Assessments 2020.



Chart 2. Number of Households on Social Housing Waiting Lists on the basis of Disability as % of Total Housing Need by Local Authority



Sources: CSO Census 2016. The Housing Agency; Summary of Social Housing Assessments 2020

It can be seen that Local Authorities such as Galway City, Cork City, Wexford and Kerry are at twice the rate for the State as a whole (0.11%) or are higher. Fingal, Laois, Cavan, Donegal, Dublin City, Longford, and Monaghan stand at half the rate for the State, or lower.

A similar spread can be seen when the total number (for all categories) on the waiting list by Local Authority is used as a reference point against which the number in need due to disability can be compared. (See Chart 2). With the % for the State as a whole at 8.2%, Sligo is almost three times as high, and Dublin City is under a quarter of the national figure.

It can be argued that Chart 1 may not present a valid picture in that it compares total population – a number of persons – with a number of households. However, when the total number of households in each Local Authority area is used as the basis for comparison, the result remains largely the same, with similar variations.²⁵

Chart 3 illustrates the variation between Local Authorities, and between local authorities and the average for the State, using total population²⁶ and total numbers in need of housing as comparators. The outlying positions of Cork City, Galway City, Kerry, Wexford, Louth, Galway County, Carlow and Sligo on one extreme, and Fingal, Dublin City, Longford, Laois, Cavan, Monaghan and Donegal at the other extreme are clear.

It should be noted that the Summary of Social Housing Assessments 2020 (and in previous years) distinguishes between the number of households on the waiting lists where the Main Need for Social Housing Support is identified as a disability and the number of households where the Specific Accommodation Requirement is categorised as 'disability' and where this refers to circumstances where the accommodation will need to meet certain specific conditions linked to a specific disability or disabilities.

Using the number of households deemed in need of Specific Accommodation Requirements due to a disability as a percentage of the total population in Census 2016²⁷, it is noticeable that Kerry, Galway and Sligo with rates of 0.28%, 0.17% and 0.20% respectively are substantially above the national average of 0.08%, while Local Authorities such as Dún Laoghaire-Rathdown (0.01%), Fingal (0.02%) and Laois (0.02%) are considerably below that average. The data relating to this form of categorisation exhibits considerable variation as between Local Authority areas.

²⁵See Appendix 1 for relevant data table.

²⁶It should be noted that the population data figures used are from Census 2016 and, therefore, may not be fully comparable with the social housing assessment data which is from 2020.

²⁷See Appendix 2 for relevant data table



Chart 3. Scatter Chart of Numbers in Need of Social Housing due to Disability plotted against Total Population and Total Persons in Need of Housing 2020

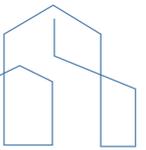


Sources: CSO Census 2016. The Housing Agency; Summary of Social Housing Assessments 2020

Variation between Local Authorities

Several reasons can be suggested as possible explanations for the variations noted above.

- The most immediate explanation is that the variations are caused by variations in the demographic profile of the Local Authority areas concerned. With few if any exceptions, it is difficult to place very much value on this argument. The variations evident in the data appear irrespective of urban/rural balance, Local Authority area size or Local Authority area population. Equally, the percentage of the population categorised as having a disability shows little variation across the State, with only six of the 31 local authority areas varying from the national average of 13.5% by more than one percentage point. Cork City is an outlier at 18.1%, with Wexford ranking second highest at 15.1%.
- It can be suggested that the variations result from inconsistencies in the data collection methods. However, Local Authorities were given detailed guidance in relation to the process to be carried out and the data was subject to checks by the Local Government Management Agency (LGMA) before being passed to the Housing Agency for analysis and publication. If the data is to be criticised in any way, such criticisms would concern the absence of more detailed, disability-specific data regarding, for example, the length of time that applicants with disabilities have remained on the waiting list, the age of applicants with disabilities, and/or their present situation accommodation-wise.
- There is evidence from NGOs at local level that some Local Authorities may be more demanding, stringent and critical in how they apply eligibility criteria and in how they assess applicants with certain categories of disability and/or current living arrangements.
- It is possible that the variations are evidence of differing levels of success by various Local Authorities in actually providing social housing support for applicants with disabilities. While this is a plausible reason, it is difficult to either prove or disprove it, given the difficulty of accessing adequately detailed data relating to Local Authority delivery. While data regarding more general social housing provision and regarding delivery of Housing Adaptation Grants for People with Disabilities is available at Local Authority level, information regarding delivery of actual accommodation for applicants with disabilities is not. The variations might be evidence of a range of high/low levels of applications depending on the individual Local Authority. Feedback from support and advocacy providers suggests that many people with



disabilities find the application process complex and challenging, and that Local Authorities vary greatly in the manner in which they make information available, facilitate and enable applications, and support or discourage people through the process. While some Local Authorities proactively encourage and support applications, others are seen as presenting obstacles to engagement.

It is, therefore, reasonable to conclude that Local Authorities vary in their performance regarding delivery of accommodation for people with disabilities; in how stringently they apply eligibility criteria; in how supportive they are in facilitating the application process; and in how proactive they are in communicating effectively with people with disabilities. It is also reasonable to point to the shortcomings that exist in the data available, especially at a Local Authority level.

An analysis²⁸ of households with a disability basis of need for social housing conducted in conjunction with the publication of the National Housing Strategy for Disabled People 2022-2027 also identifies and considers the variations between Local Authorities. While expressing a need for caution in comparing the rate of households across regions, the analysis noted a 'marked variation in the proportion of applicants with

a disability related basis of need relative to the total number of households on the waiting list across different LA areas in 2020'.

The Sixth Report of the Implementation Monitoring Group (National Housing Strategy for People with a Disability 2011–2016)²⁹ reported that:

In 2019 the (Housing) Agency, in consultation with the LGMA, continued work on the development of a comprehensive form for local authorities to capture data relating to the allocation of housing to people with disabilities which is essential data to facilitate planning at local and at national level...³⁰

In 2019 local authorities continued to report to the Housing Agency on the allocations of social housing to people with a disability in 2018. The results of the reporting exercise continue to reflect the substantial efforts undertaken by local authorities to provide housing for people with a disability. Year-on-year the statistics show improvements with allocations to people with a primary basis of need as a disability increasing from 1,206 in 2016 (the first year for which statistics were compiled) to 1,401 in 2018. The majority of local authorities met the targets set in their Local Strategic Plans.

²⁸Kenny, Oona, (2021) Analysis of Households with a Disability Basis of Need for Social Housing 2016-2020. Housing Agency. <https://assets.gov.ie/213189/9a3039aa-e041-40f7-9831-f05d54890ae7.pdf>

²⁹Sixth Report of the Implementation Monitoring Group, http://www.housing.old.gov.ie/sites/default/files/publications/files/2020-11-24-sixth_report_of_the_img_2019.pdf p.9

³⁰It is noted that there have been updates to the social housing application form with specific reference to disability.

The real level of housing need is also (significantly) underreported as many people with disabilities are not on the housing list.³¹ Many disabled people cannot compete in the market for either private rental (which is often unsuitable) or private purchase. Also, many people are not on the housing list as they live with family (including ageing parents) and are not thinking ahead about their future accommodation needs.

A key issue is that there does not appear to be readily accessible comprehensive information available about the length of time people with disabilities are on housing waiting lists. However, it has been estimated³² that households with a disability need for housing face higher median waiting times than other qualified households, and that there is a pattern of waiting time increasing for the households with a disability need. In this regard, it is noted that Galway County Council's interactive housing report³³ provides a useful model of what is possible. It shows, for example, that – at the end of February 2022 – of the 594 disabled people on the housing list, 16 (3%) had been waiting for over 15 years; 73 (12%) for 11-15 years; and 203 (34%) for 5-10 years. Almost half (49%) had, therefore, been on the waiting list for over 5 years.

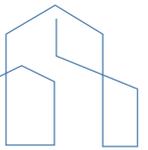
The 2021 analysis referenced above also notes that:

- The proportion of households with a disability need for housing as a percentage of all qualified households has been rising year-on-year from 2016 to 2020;
- The number of applicants who are assigned an additional need based on disability is also growing year-on-year;
- About 20% more applicants with a disability related housing need have social welfare as their only income source and they are about three and a half times less likely to have an income source from employment, putting them at a higher risk of poverty;
- The median wait time for all qualified households is lower in all years compared to households with a disability need and there is a general pattern of wait time increasing for these households, but falling for all households;
- Moreover, that gap began to widen further from 2018, possibly due to other households moving into the private rented sector with HAP, an option that may not be suitable or feasible for households where there is a disability factor involved.

³¹ See DFI Submission to Consultation on New Housing Strategy, <https://www.disability-federation.ie/publications/dfi-submission-to-consultation-on-new-national-hou/>

³² Kenny, Oona, (2021) Analysis of Households with a Disability Basis of Need for Social Housing 2016-2020. Housing Agency.

³³ <http://www.galway.ie/en/services/housing/demand/>



The analysis, furthermore, points to the need for inclusion of a stand-alone question in the social housing application form that would ask if any member of the household has a disability, as a means of identifying these (disability) households more accurately. This would act as a 'disability identifier' and provide a reliable and comprehensive count and profile description of these households which could in turn be used to track and monitor their current situation and outcomes.

Need for and provision of home adaptation supports

For people who are already in housing, either self-owned, family-owned or private rented, the acquisition or progression of a disability can create a need for adaptations to the accommodation in order to meet the new and/or evolving needs. Housing Adaptation Grants for Persons with Disabilities are administered by Local Authorities and comprise contributions by the State (80%) and the local authority (20%) toward approved adaptations in both owner-occupier and rented accommodation. The proportion of the total cost of the work that the applicant must make is subject to means-testing.

As with the processing of applications for social housing on the basis of disability, feedback from disability organisations strongly suggests that the process of

establishing eligibility for, and actually accessing the Housing Adaptation Grant, is a major challenge for people with disabilities. CISs, NAS, DFI member organisations and other NGOs have expressed dissatisfaction with the delays and bureaucracy experienced by people with disabilities in accessing this grant support. While data is not immediately available regarding the number of applications that are made in any given period to Local Authorities for Housing Adaptation Grants, it is possible to examine the delivery of these grants by Local Authority.

As with social housing waiting lists, the variation between Local Authorities with regard to payments under the Housing Adaptation Grants scheme is considerable.³⁴ Sligo, Monaghan and Clare show payments per head of population of over twice the national average, while Waterford, Leitrim and Dún Laoghaire-Rathdown are closer to half the national figure. As with waiting lists it is difficult to explain how these variations come about. From a positive perspective it is possible to theorise that the variations are caused by local demographics or other conditions. From a more critical perspective it could be that much of the variation is caused by differing approaches and processes being adopted by individual Local Authorities. This is an area where further research would be informative.

³⁴See Appendix 3 for data table.

Housing Assistance Payment Scheme

The Housing Assistance Payment (HAP) scheme is a form of social housing support provided by all Local Authorities. HAP can be provided to anyone who qualifies for social housing support. The HAP scheme involves Local Authorities making a monthly payment to a landlord on behalf of the HAP tenant, subject to terms and conditions, including rent limits. In return, the HAP tenant pays a contribution towards the rent to the Local Authority. This 'rent contribution' is based on the household income. It is calculated in the same way as the rent paid by a tenant of a Local Authority owned property.

A CIB social policy report, *Housing Assistance Payment: The Experience of Citizens Information Services*³⁵ highlighted a number of difficulties relating to HAP, including, in particular, the limited stock of private rented accommodation and the even more limited stock of affordable private rented accommodation.

The circumstances of households before, during and after participation in HAP were explored by the CSO in *Social Housing in Ireland 2019 – Analysis of Housing Assistance Payment (HAP) Scheme*.³⁶ A total of 14,540 households came into HAP for the first time in 2019. The basis of need for HAP (for those tenants who could be linked to housing waiting lists) was identified as a *Disability Requirement* for 4.1% of all tenants. A further 1.8% were categorised as *Exceptional Medical or Compassionate Grounds*. About 3% of HAP tenants were categorised as *Enduring Physical, Sensory, Mental Health or Intellectual Impairment*.

One in four of those with a general classification of need on the 2016 housing waiting list subsequently entered HAP with the next highest proportion (17.3%) entering HAP being those with enduring physical, sensory, mental health or intellectual impairment.

The next chapter will set out the broad policy context of housing provision for people with disabilities in Ireland and will include reference to some relevant research findings.

³⁵Housing Assistance Payment: The Experience of Citizens Information Services, https://www.citizensinformationboard.ie/downloads/social_policy/HAP_Report_CIB_2017.pdf

³⁶Social Housing in Ireland 2019 – Analysis of Housing Assistance Payment (HAP) Scheme.



Chapter Four

Housing and People with Disabilities: Policy Context

Right to adequate accommodation

No formal or constitutional right to housing exists in Ireland. In effect, treating people with disabilities in the same way as other citizens in relation to housing means that they have less freedom of choice than other people, are often heavily dependent on family members, are sometimes left socially isolated and may have to move away from their local communities to live in a residential care facility. The links between disability and low incomes and the added costs of suitable accommodation mean that people with disabilities are at a disadvantage when it comes to housing and, in particular, to home ownership.

As in other areas, equal status for people with disabilities requires that they have the means to exercise their right to equality in housing. As far back as 1996, the Report of the Commission on the Status of People with Disabilities stated that:

"If housing is to provide the base from which people with disabilities participate in society, then policies must address not only the question of the physical fabric of buildings and the serviceability of the wider environment but also the services, supports and income required to facilitate independent living." (12.4)

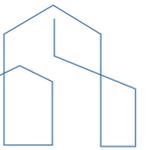
The Planning and Development Act 2000 requires each planning authority to develop a strategy for ensuring the housing of the existing and future population of its area. This evidently should include people with disabilities. The National Economic and Social Council (NESC) has argued that:

A housing strategy must assess the existing and future need for housing, ensure that housing is available for persons with different levels of income, that a mixture of housing types and sizes are developed to match the different categories of households (including the special requirements of older persons and persons with disabilities) and counter undue segregation.³⁷

Relevant provisions of the UN Convention on the Rights of Persons with Disabilities (UNCRPD)

At the core of the debate on housing provision for people with a disability is the need for the State to recognise the right to adequate housing and to implement appropriate legislation and policies in this regard. The UN Convention on the Rights of Persons with Disabilities (UNCRPD) has a number of provisions that relate to housing, in particular, Article 19, which refers to the right to live independently and to be included in the community. Article 28 (2d) refers to ensuring access by persons with disabilities to public housing programmes.

³⁷NESC, Housing in Ireland: Performance and Policy, http://files.nesc.ie/nesc_reports/en/NESC_112_2004.pdf p.119.



Article 19 requires that State parties to the Convention recognise the equal right of all persons with disabilities to live in the community, with choices equal to others, and take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community by ensuring that:

- (a) Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement
- (b) Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community
- (c) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.

The first Irish Government national report on the UNCRPD (Initial Report under the Convention on the Rights of Persons with Disabilities) was published as a Draft Consultative Report in December 2020³⁸. In its response under Article 19, the Draft Report states:

Ireland recognises the equal right of all persons with disabilities to live in the community. Disability strategy and policy in Ireland has a strong focus on the independence and inclusion of persons with a disability in their community, including in the choices that they have in respect of independent living. A significant number of actions committed to under NDIS (the National Disability Inclusion Strategy) address the provisions of Article 19 (Par. 227).

The Draft Report references *Time to Move On* which set out a vision for community living for all persons with a disability. The Draft Report states that the strategy outlined in *Time to Move On* enables people to move from congregated settings to their own homes in the community with the support they need - individualised supports designed to meet individual needs and wishes.

³⁸CRPD. Initial Report under the Convention on the Rights of Persons with Disabilities Ireland 857afc7b-edbc-4b3b-8475-663b4200db5d.pdf (www.gov.ie)

Challenges in relation to the implementation of *Time to Move On* are identified in the Draft Report as including delays in the process, sourcing additional funding schemes and the increasing costs of properties. It noted that, in 2019, 118 (out of a target of 160) persons were facilitated to move into the community and that the number of people in congregated settings has reduced by 2,146 since the National Housing Strategy for People with a Disability was introduced.³⁹

A number of Guidance documents have been made available to support persons with a disability to successfully transition into living in the community, including *Supporting People with Disabilities to Access Appropriate Housing in the Community: A Guidance Document*⁴⁰ (which provides information for service providers on the mechanisms and funding options available to secure homes for people) and *Making A Home: A Practical Guide to Creating a Home and Moving to the Community*⁴¹ which is a resource for service providers and stakeholders supporting people to move from congregated settings to homes in the community. However, clearly, guidance documents can only go so far if there is insufficient funding and actual delivery of accommodation.

The Draft Report also noted that under the HSE Disability Capital Programme, some €100 million has been provided over a number of years for the provision of housing to support people transitioning from congregated settings.

The outcomes and costs of new or emerging models of service in the disability sector have been outlined by the NDA.⁴² Included in the nine quality of life outcome domains framework for disability services are: people living in their own home in the community; people exercising choice and control in their everyday lives; and people being secure and free from abuse.

Design and accessibility

Universal Design Guidelines for Homes in Ireland were published by NDA/Centre for Excellence in Universal Design (CEUD) in 2015.⁴³ The Design Guidelines are informed by research, a literature review of national and international best practice and guidance and a consultation process with key stakeholders. NDA/CEUD have also published Guidelines on Dementia Friendly Dwellings for People with Dementia, their Families and Carers⁴⁴, which support the Universal Design Homes for Ireland Guidelines and which are aimed at informing national policy.

³⁹It should be noted that some of this reduction would have been accounted for by people dying.

⁴⁰Supporting People with Disabilities to Access Appropriate Housing in the Community: A Guidance Document, <https://www.hse.ie/eng/services/list/4/disability/congregatedsettings/guidancedoconhousingoptions.pdf>

⁴¹Making A Home: A Practical Guide to Creating a Home and Moving to the Community, <https://www.hse.ie/eng/services/list/4/disability/congregatedsettings/making-a-home-a-practical-guide-to-creating-a-home-and-moving-to-the-community-july-2019.pdf>

⁴²Outcome Measurement in evaluating the Quality of Disability Services, <http://nda.ie/Publications/Disability-Supports/Disability-Services/Outcome-Measurement-in-evaluating-the-Quality-of-Disability-Services1.pdf>

⁴³Universal Design Guidelines for Homes in Ireland, <http://universaldesign.ie/Web-Content-/Introduction.pdf>

⁴⁴Guidelines on Dementia Friendly Dwellings for People with Dementia, http://universaldesign.ie/Web-Content-/UD_Guidelines-Dementia_Friendly_Dwellings-2015-full-doc.pdf



Pathway 2 of *Housing for All* states that, under the guiding principles of the plan and underpinned by the new Strategy –

“...we must work to deliver appropriately designed and specified housing for people with a disability, in line with the vision and principles of universal design’.

The National Housing Strategy for Disabled People 2022-2027 emphasises (p.28) the need to ensure that accommodation is accessible.

“As outlined in General Comment 5 of the UNCRPD, it is important that services and facilities in communities, including housing, are available in an accessible and adaptable way, and in line with universal design principles”.

The new Strategy also (p.52) references and commits to promoting Article 4.1 (f) of the UNCRPD which is:

‘To undertake or promote research and development of universally designed goods, services, equipment and facilities... which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to promote universal design in the development of standards and guidelines’

Universal Design Homes work well for everyone and should be integrated into the neighbourhood; be easy to approach, enter and move about in; be easy to understand, use and manage; be flexible, safe, cost effective and adaptable over time⁴⁵.

Despite these aspirations people with a disability continue to experience problems with access to and potential adaptation of accommodation. Commentators⁴⁶ have pointed to the shortcomings in planning and building regulations, and in particular to the poor implementation and application of Part M (Section 3 Access and Use) of the Building Regulations 2010.

Part M of the Building Regulations (2000) is an amendment to the original Building Regulations (1997) which covers access for people with disabilities, including ensuring that new dwellings (houses, flats and apartments) and extensions are visitable by people with disabilities. TGD M (the Technical Guidance Document for Part M) deals with ‘Access and Use’ for the built Environment.

The Building Control Act 2007 introduced a new Disability Access Certificate (DAC) required (since 2010) for new public buildings to ensure compliance to the Building Regulations Technical Guidance Document M at the planning stage.

⁴⁵Government of Ireland (2022) National Housing Strategy for Disabled People. <https://www.gov.ie/en/publication/60d76-national-housing-strategy-for-disabled-people-2022-2027/>

⁴⁶See Bernadette Egan. Submission to the Joint Committee on Disability Matters, October 14th, 2021, https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_disability_matters/submissions/2021/2021-10-14_opening-statement-bernadette-egan-architect-member-of-the-riai-universal-design-task-force_en.pdf and Irish Wheelchair Association submission to the Joint Committee on the same date, https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_disability_matters/submissions/2021/2021-10-14_opening-statement-tony-cunningham-et-al-director-of-volunteering-and-housing-irish-wheelchair-association_en.pdf

It is noted that the regulations, at present, only insist that new buildings be 'visitable', and that this standard falls well short of regulations in, for example, the UK.

It can be argued that, at a minimum, Part M needs to be updated and strengthened, and that there needs to be a determined move towards the creation and application of legally enforceable Universal Design and accessibility standards in Ireland.

Investment in accessible accommodation to Universal Design standards will, in addition, reduce expenditure on retrofitting at a later stage.

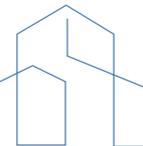
Commitments in Programme for Government

The *Programme for Government – Our Shared Future* (2020) included a range of commitments on disability generally. The commitments on housing include:

- Ensure that an appropriate mix of housing design types is provided, including universally designed units, and accommodation for older people and people with disabilities.
- Continue with the successful decongregation programme and complete a further move of more people with disabilities from congregated settings to homes in the community, with the necessary supports.
- Reduce and provide a pathway to eliminate the practice of accommodating young people with serious disabilities in nursing homes.
- Include the consideration of disability in all housing policy reviews.

In addition, the Programme affirms the Government's intention and wish to:

- Empower and give those with a disability the ability to choose the supports that most meet their needs.
- Improve and change services through better implementation and collaboration.
- Ensure that the most effective interventions are provided for each individual to guarantee the best outcomes.
- Continue to work with all government departments and their agencies, to ensure that a disability perspective is integrated into mainstream policy development.



Rebuilding Ireland: Action Plan for Housing and Homelessness

Rebuilding Ireland⁴⁷ includes the following commitments relevant to people with a disability:

- Provide for the needs of older people or people with a disability living in social housing
- Provide targeted support to private houses, via the Housing Adaptation Grant, Housing Aid for Older People and Mobility Aids Grant
- Enable older people and people with disabilities to remain living independently in their own homes for longer and also to facilitate early return from hospital stays
- Continue to support the transitioning of people with disabilities from congregated settings to community-based living, through ring-fenced housing capital provision.

However, no clear targets were set for realising these commitments.

Housing for All

*Housing for All*⁴⁸ includes a commitment to increase and improve housing options and supports for people with a disability and to deliver appropriately designed and specified housing in line with the vision and principles of universal design.

Under *Housing for All*, Local Authority Housing Delivery Action Plans will set out how dedicated social housing provision for people with a disability will be delivered by themselves and social housing delivery partners, matching the scale and extent of housing need identified.

Local Authorities will be required to consider the needs of people with a disability in the wider planning process. In this regard, the new Housing Need and Demand Assessment (HNDA) Framework also specifically requires consideration of the housing needs of people with a disability. *Housing for All* states that the evidence garnered through the HNDA process on disability will be used when developing Local Authority Housing Strategies “thereby ensuring that the planning process fully considers how to provide for the housing needs of people with a disability” (p.67).

There is a commitment to continue to support the transition of people with a disability from congregated settings to community based living, in particular by providing continued funding through the Capital Assistance Scheme.

⁴⁷https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland_Action-Plan.pdf

⁴⁸*Housing for All*, <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

Housing for All states explicitly that Housing and Disability Steering Groups (HDSGs) are responsible for the implementation of national policy on disability and housing at local level and the development and implementation of Local Strategic Plans. This is a very important statement of policy and one that clearly needs to be fully implemented in practice. However, it will only be meaningful if the required resources are in place.

Objective 7 of *Housing for All* includes the following:

- Deliver a new National Housing Strategy for People with a Disability (2022 - 2027) with a range of actions which will detail the co-ordination and alignment of housing, health and community supports (7.1);
- Local Authority Housing Delivery Action Plans will set out how dedicated social housing provision appropriate to the needs of people with a disability will be delivered matching the scale and extent of housing need identified for people with a disability (7.2);
- Local Authorities will consider the housing needs of people with a disability through the Housing Need and Demand Assessment Framework and feed that into their Housing Strategies as part of their Development Plan process (7.3);
- Review the range of housing grants available to assist with meeting specific housing needs, including the Housing Adaptation Grant for People with a Disability, and implement relevant changes (7.4);
- Nominate Disability Friendly Housing Technical Advisors in each Local Authority (7.5);
- Housing and Disability Steering Groups will report quarterly on the implementation of their local strategic plans regarding housing for people with a disability to the Chief Executive and the Strategic Policy Committee (7.6).

The *Housing for All* plan refers to the construction and acquisition of one-bed homes and to ensuring provision of the necessary health and mental health supports required to assist homeless people with complex needs. It also refers to continuing to increase access to health supports and ongoing protections for homeless individuals, with an individual health care plan to be provided for all homeless individuals that need one and improved access to mental health services. Apart from referencing *Housing First* (the National Implementation Plan aimed at ending chronic homelessness) the *Housing for All* plan does not specifically refer to the housing needs generally of people experiencing mental health difficulties.



National Disability Inclusion Strategy (NDIS)

The Disability Act 2005 stipulates that mainstream public services should be inclusive of people with disabilities. It also requires that goods or services procured from external providers by public bodies shall be accessible to people with disabilities, unless that would not be practicable, would not be justified for cost reasons, or would result in unreasonable delays. In recent years, Irish policy on disability has been developed within the framework of the National Disability Inclusion Strategy (NDIS) 2017-2021, based on an all-of-Government approach broadly around eight key themes:

- 1) Equality and choice
- 2) Joined up policies and public services
- 3) Education
- 4) Employment
- 5) Health and wellbeing
- 6) Person-centred disability services
- 7) Living in the community; and
- 8) Transport and access to places

The NDIS contains the following commitments in relation to housing and people with a disability:

- The preparation of policy advice on ways of achieving universal design solutions for new housing so that new homes can be accessed and used by all persons, irrespective of size, age, ability or disability (Action 97).
- Review of the suite of housing adaptation grant schemes, for the purpose of evaluating how the application process can be streamlined for older people and people with a disability (Action 98).

National Housing Strategy for People with a Disability 2011-2016⁴⁹

The National Housing Strategy for People with a Disability 2011–2016 (NHSPWD) (replaced at the beginning of 2022 with the *National Housing Strategy for Disabled People 2022 – 2027*) and a National Implementation Framework (published in 2012) set out an approach based on the delivery of housing for persons with a disability through mainstream housing options. The Strategy and Framework were developed in conjunction with *Time to Move On*. While previously many people with disabilities may have had their housing needs met through health-funded service providers, under the Strategy it was expected that people with disabilities would have better access to social housing through Local Authority provision. The Strategy emphasised choice, equity across housing tenures and delivering quality outcomes for people with a disability through mainstream housing.

The timeline for the strategy was extended under *Rebuilding Ireland*⁵⁰ and a new strategy was published in January 2022.

The vision set out in the NHSPWD is important:

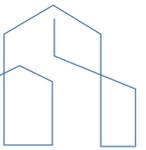
“to facilitate access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustained manner, which promotes equality of opportunity, individual choice and independent living”.

This statement of vision was indicative of a significant departure in how the housing needs of people with a disability were to be addressed. In order to achieve this vision, the following strategic aims were outlined:

- To promote and mainstream equality of access for people with a disability to the full range of housing options available suited to individual and household need;
- To develop national protocols and frameworks for effective interagency cooperation which will facilitate person-centred delivery of housing and relevant support services;
- To support people with a disability to live independently in their own homes and communities, where appropriate;
- To address the specific housing needs of people with an intellectual and/or physical disability, moving from congregated settings in line with good practice, including through the development of frameworks to facilitate housing in the community;
- To address the specific housing needs of

⁴⁹<https://www.housing.gov.ie/housing/policy/people-disability/housing-people-disability>

⁵⁰https://rebuildingireland.ie/wp-content/uploads/2016/07/Rebuilding-Ireland_Action-Plan.pdf



people with a mental health disability, including through the development of frameworks to facilitate housing in the community, for people with low and medium support needs moving from mental health facilities, in line with good practice;

- To consider good practice in the design, coordination and delivery of housing and related supports;
 - To facilitate people with a disability to access appropriate advice and information in respect of their housing needs;
 - To improve the collection and use of data/information regarding the nature and extent of the housing needs of people with a disability;
 - To provide a framework to support the delivery, monitoring and review of agreed actions.
- Statutory responsibility in relation to the provision of housing for people with a disability and related services rests with individual Local Authorities.
 - The Housing Agency is responsible for driving and overseeing the implementation of the actions in terms of progressing housing provision for people with disabilities. This is done primarily through its various subgroups.
 - The HSE is responsible for the provision of healthcare and social supports for people with a disability and manages a significant annual budget for such services.
 - The Department of Health (DoH) also provides funding to facilitate housing and support for people with a disability and, in collaboration with the Department of Housing, Local Government and Heritage, is involved in the provision of a national framework of policy and legislation for housing of people with disabilities.

The NHSPWD set out a cross-government response to meeting the housing needs of people with disabilities:

- The Department of Housing, Local Government and Heritage's (DHLGH) role involves the provision of a national framework of policy, legislation and funding to underpin the role of Local Authorities in addressing housing at local level.
- The coordination and development of Government disability policy on a wider scale is carried out by the Department of Justice and Equality.⁵¹

⁵¹This function moved to the new Department of Children, Equality, Disability, Integration and Youth.

Implementation of 2011-2016 Strategy

Implementation of identified actions in the NHSPWD was driven primarily by the Housing Agency by means of a dedicated sub-group which comprised representatives from:

- Department of Housing, Local Government and Heritage
- HSE
- Local authorities
- Irish Council for Social Housing
- Various disability representative organisations

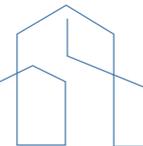
Under the NHSPWD, Housing and Disability Steering Groups were established in all Local Authority areas. These Steering Groups are also a key component of the National Housing Strategy for Disabled People 2022-2027. Their aim is to achieve a coordinated and integrated approach to meeting the housing needs of persons with a disability. Groups prepare a Strategic Plan for their areas to develop specific local strategies to meet identified and emerging need. These plans, along with the annual *Summary of Social Housing Assessments* are aimed at enabling Local Authorities to plan more strategically for the housing needs of persons with disabilities and to use all appropriate housing supply mechanisms. The extent to which these plans were in place and were used is unclear and this matter will be discussed further in Chapter 5.

An Implementation Monitoring Group (IMG) was established by the Department of Housing, Local Government and Heritage to monitor and report on progress. The IMG was chaired by a senior official of the Department and comprised representatives from the HSE, Department of Health, the Housing Agency and disability representative organisations. The Implementation Monitoring Group has published annual Progress Reports, the latest being the Seventh Progress Report January-December 2020.⁵² Under the NDIS, each government department is required to have a *Disability Consultative Committee* to oversee and monitor the National Disability Inclusion Strategy. Establishing the effectiveness of these committees in addressing housing matters would require further research.

The Department of Housing, Local Government and Heritage in conjunction with the Housing Agency have also published *A Guide to Housing Options* available through Local Authorities.⁵³ The booklet provides an overview on the various housing options and schemes available through Local Authorities. It covers a wide range of topics including applying for social housing support, grants for housing adaptations and local authority mortgages.

⁵²<https://www.gov.ie/en/publication/ae5d4-seventh-progress-report-on-the-implementation-of-the-national-housing-strategy-for-people-with-a-disability-january-december-2020/>. Published Dec 2021.

⁵³https://www.dlrcoco.ie/sites/default/files/atoms/files/housing_options_english.pdf



National Housing Strategy for Disabled People 2022-2027⁵⁴

The National Housing Strategy for Disabled People 2022 – 2027 (NHSDP) was launched in January 2022 and aims to build upon the work achieved through the previous National Housing Strategy for People with a Disability 2011-2016. The new Strategy was developed by the Department of Housing, Local Government and Heritage in association with the Department of Health and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) under the guiding principles of *Housing for All*. The Strategy outlines the framework for the delivery of housing for people with disabilities through mainstream housing policy.

The Strategy sets out a vision for the cooperation and collaboration of Government departments, state agencies and others in delivering housing and the related supports for disabled people over the five years of its operation. The stated vision of the Strategy is –

To facilitate disabled people to live independently with the appropriate choices and control over where, how and with whom they live, promoting their inclusion in the community, and

To further enable equal access for disabled people to housing with integrated support services.

The Strategy sets out six themes that will contribute to achieving the stated aims.

⁵⁴National Housing Strategy for Disabled People, <https://assets.gov.ie/213153/a6abe06d-5651-4313-b75c-46571b2378c2.pdf>

Theme 1 Accessible Housing and Communities

This theme focuses on the provision of accessible housing for disabled people, the promotion of accessible communities and universally designed homes.

Theme 2 – Interagency Collaboration and the Provision of Supports

This theme includes outcomes relating to the improvement of effective collaboration between local authorities and the HSE, better inter-departmental cooperation, aligning housing and support services and the sharing of relevant information between agencies.

Theme 3 – Affordability of Housing

This theme focuses on enabling access to affordable housing for disabled people. In keeping with *Housing for All* and, in particular, “Pathway 1 - Supporting Home Ownership and Increasing Affordability”, it is important that disabled people are included in the provision of affordable housing. This theme examines these issues and addresses the challenges disabled people may experience living in the private sector, in terms of home ownership and private renting.

Theme 4 – Communication and Access to Information

This theme focuses on communication and access to information. The Strategy aims to ensure that disabled people are not disadvantaged in communicating their needs and in the communication they receive.

Theme 5 - Knowledge, Capacity, and Expertise

This theme puts forward measures to increase awareness and understanding of disability and housing within the relevant organisations. Relevant organisations here include Local Authorities, Approved Housing Bodies, the HSE and disability service providers

Theme 6 – Strategy Alignment

This theme places a focus on ensuring that all Government strategies and policies from a housing perspective promote the rights of disabled people, in line with the UNCRPD.



Figure 1: Strategy Themes



An Implementation Plan was to be prepared and published by the end of Quarter 2 of 2022, which has been extended to Quarter 4 containing the specific actions required to deliver under each theme. In addition, the Strategy contains some initial actions that were to be commenced ahead of the publication of the Implementation Plan.

The Strategy, while recognising the progress that was made under the previous Strategy (NHSPWD), acknowledges that there is still more to do. Some of the actions from the NHSPWD are seen as remaining relevant and are to be carried forward into the new Strategy. These include:

- 1) The Housing and Disability Steering Group structure to be maintained and strengthened over the lifetime of the new national Strategy. This structure is reaffirmed as 'the most effective forum for the delivery of the outcomes of the Strategy at local level'.
- 2) Review and embed the National Guidelines for Assessment and Allocation Process for Housing Provision in the practices of the local authorities through their Housing Allocation Policies/Schemes of Letting Priorities.
- 3) The Local Strategic Plans should be reviewed in 2022 to take account of the aims and objectives of the new Strategy and any related actions.
- 4) The reporting on allocations and pipeline delivery should be done in line with the requirements of *Housing for All* and annual returns should continue to be made to The Housing Agency to ensure the focus on delivery is maintained.
- 5) The Housing Adaptation Grant Schemes to be continuously reviewed to ensure that they remain fit for purpose, including the examination of the inclusion of grants for assistive technology, to take advantage of the improvements in technology.
- 6) The Early Interventions Process training should be mainstreamed as part of the training programme and made available to local authorities and Approved Housing Bodies through The Housing Agency.
- 7) The Accessible Information Initiative should be continued and expanded to examine the most up to date and efficient means of communication.
- 8) The Mental Health Property Transfer Project⁵⁵ should be included to ensure that the project is completed. A timeline to the middle of 2022 should be set for completion.
- 9) All appropriate agencies will continue to work towards completion of the decongregation programme.

⁵⁵The Mental Health Property Transfer Project was to achieve the deliverables under Priority Action 5.3 of the NHSPWD to 'facilitate the effective transitioning of people with mental health disabilities from HSE mental health facilities to appropriate community settings within sustainable communities' and Priority Action 5.4 'development of a Housing Support Scheme for people transitioning from HSE mental health facilities'.



The Strategy outlines the extent and manner in which it will contribute to meeting Ireland's commitments *vis-a-vis* the UNCRPD Articles. These include –

- It will promote the purposes of Article 4(1) (f) through the inclusion of a Universal Design approach to housing.
- It will promote the purposes of Article 4.3 through continued consultation and ensuring the effective participation of people with disabilities in decision-making, through local and national fora.
- It will promote the purposes of Article 9 through the increased provision of accessible homes in the right locations, accessible information and assistive technology, and building awareness of the need for accessible communities, thereby promoting people's participation in their communities.
- It will promote the purposes of Article 19 by ensuring that people with disabilities have equal access to housing and clearer pathways to accessing support services, promoting their inclusion in the community from a housing perspective.
- It will promote the purposes of Article 28 by ensuring people with disabilities have equal access to public housing and providing pathways to affordable housing.
- It will promote the purposes of Article 31 by collecting data to inform and enable the efficient coordination of housing and housing related services that will be easily accessed and regularly published.

In addition to its six general themes outlined above, the Strategy outlines a number of other provisions that will be made to address various issues and to align the Strategy clearly to *Housing for All*.

- Each local authority will nominate Disability-Friendly Housing Technical Advisors;
- Each local authority will nominate a representative from their Housing Departments to lead on the interagency collaboration;
- The HSE will nominate a housing coordinator in each Community Health Organisation (CHO) area for both Mental Health Services and Disability Services to lead on the interagency collaboration;
- The Housing Agency's role will be expanded to take a more proactive role in ensuring the delivery of the actions under the Strategy and to coordinate the interagency collaboration at regional and national level;
- The Housing Agency will be tasked with ensuring the smooth implementation of the Assisted Decision-Making (Capacity) Act 2015 for the housing departments of local authorities and Approved Housing Bodies, including the preparation of guides and provision of training.

The new Strategy acknowledges the crucial importance of ensuring the co-ordination of suitable housing provision with the delivery of key health and social care supports. It re-emphasises the importance of strengthening and supporting coordination frameworks, building effective collaboration, aligning housing and support services, and the sharing of relevant information between agencies.

The launch of the new Strategy was accompanied by a supporting suite of publications including an analysis of households with a disability basis of need for social housing⁵⁶, a review of the operations of the local Housing and Disability Steering Groups⁵⁷, a study of good practice models from other jurisdictions⁵⁸, and a review of the previous (2011-2016) Strategy⁵⁹.

Housing and social inclusion

Housing is a key determinant of social inclusion and is critically important for the independence and dignity of people with disabilities. It provides a basic foundation

for personal development, for learning new skills, getting employment, contributing to the economy and society, and for socialising and interacting with society. Yet many people with disabilities cannot access appropriate housing due to a combination of factors – the nature of their disability, unemployment, discrimination, poverty, low wages, and/or high property prices. Some are forced to live in poor standard and/or inappropriate accommodation in the private rented sector⁶⁰ and some are homeless.

The fourth edition of the European Disability Forum's Human Rights Report⁶¹ shows that EU countries (including Ireland) have largely failed at reducing poverty faced by persons with disabilities. Over a quarter (28.7%) of persons with disabilities living in the EU are at risk of poverty. This figure rises to 38.1% in the case of people with disabilities in Ireland. This means that the rate in Ireland is 10 percentage points above the EU rate. CSO SILC 2019 data⁶² show that those most at risk of poverty in 2019 were individuals who

⁵⁶Kenny, Oona (2021) Analysis of Households with a Disability Basis of Need for Social Housing. 2016-2020. The Housing Agency.

⁵⁷The Housing Agency (2021) National Housing Strategy for People with a Disability: Collaborative Working in the Housing and Disability Steering Groups.

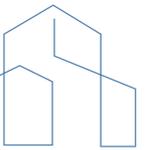
⁵⁸The Housing Agency (2021). Disability and Housing: Approaches in Other Jurisdictions

⁵⁹The Housing Agency (2021). Review of the National Housing Strategy for People with a Disability 2011 to 2016 (extended to 2021).

⁶⁰<https://galway.ncpd.ie/housing.htm>

⁶¹*Poverty and Social Exclusion of Persons with Disabilities* https://mcusercontent.com/865a5bbea1086c57a41cc876d/files/ad60807b-a923-4a7e-ac84-559c4a5212a8/EDF_HR_Report_final_tagged_interactive_v2_accessible.pdf

⁶²<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2019/introductionandsummaryofmainresults/>



were not at work due to illness or disability (37.5%) and those who were unemployed (35.4%). This compares with an 'at risk' of poverty rate of 4.6% for those that described their principal economic status as 'at work'. These poverty rates for people with disabilities have significant implications for their ability to access and manage housing.

The *Updated National Action Plan for Social Inclusion 2015-2017*⁶³ had as one of its goals (Goal No. 11) to create a more flexible and responsive system of social housing support including a range of actions to ensure that social housing supports are responsive to people's needs as well as to improvements in their circumstances. However, the Government's *Roadmap for Social Inclusion 2020-2025*⁶⁴, while including a chapter on people with disabilities, does not deal with the matter of housing for people with disabilities. Clearly, inappropriate housing, coupled with restrictions in any areas of support (financial, social or support services) and increased demands on already low household income impacts negatively on social inclusion. Very importantly, the social inclusion of people with disabilities can depend on the appropriateness of their living environment.

Selected Research Findings

While there is not much specific research available relating to the housing needs of people with disabilities in Ireland and the difficulties experienced in accessing appropriate housing, two studies commissioned by the National Disability Authority (NDA) and published in December 2020 are informative.

One of the studies, *The experience and risk of homelessness for people with intellectual disabilities and/or autism and their families in Dublin*⁶⁵ explored the experiences of persons with Intellectual disability (ID) and/or autism spectrum disorder (ASD) experiencing homelessness or at risk of homelessness in one area of Dublin. Participants highlighted socioeconomic factors such as an over-reliance on social welfare and poor literacy as factors contributing to homelessness. A lack of understanding of the needs of persons with an ID and/or ASD has often resulted in people with these disabilities living in substandard accommodation. Inadequate accommodation is also driven by an over-reliance on the private rental market. The study concludes that emergency accommodation is particularly challenging for families who have a child with an ID and/or ASD and illustrates that homeless services such as hostels are unsuitable for this population group. The report concluded

⁶³ *Updated National Action Plan for Social Inclusion 2015-2017* <https://www.gov.ie/pdf/?file=https://assets.gov.ie/31310/16cbc064b56b49e4a064b1d81fbb5841.pdf#page=1>

⁶⁴ *Roadmap for Social Inclusion 2020-2025*, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/46558/5cea3d74aa934fe780cc521ddbe477a7.pdf#page=1>

⁶⁵ <http://nda.ie/publications/disability-supports/autism/the-experience-and-risk-of-homelessness-for-people-with-intellectual-disabilities-and-or-autism-and-their-families-in-dublin-a-mixed-methods-study-.pdf>

that the unique characteristics, strengths and support needs of homeless adults with ASD are under-recognised in Irish health and social care strategies and practice. Government and policymakers need to progress and enact autism diagnosis and support services in this area. Practitioners in homeless services and across interdisciplinary teams require training to support diagnosis, screening and sensitive support interventions taking particular account of the presence of trauma, comorbidities and addiction.

The second study, *Adult autism in homelessness: prevalence, experiences and support needs in an Irish context*⁶⁶ estimated the prevalence of autistic traits among a Dublin-based homeless population of 106 adults as 2.8% increasing to 9.4% when possible autistic traits are also considered. This estimate is clearly a matter of some concern given that the estimated autism prevalence rate for the housed population in Ireland is 1-1.5%. Autism is identified as a risk factor for entry into homelessness and an added challenge to exiting from homelessness. A key conclusion is that the unique characteristics, strengths and support needs of clients with ASD are not recognised/addressed in Irish housing policy, strategy or housing support provision.

Research carried out by the Irish Human Rights and Equality Commission (IHREC) and the ESRI in 2018, *Discrimination and Inequality in Housing in Ireland*⁶⁷ found that the generally disadvantaged position of people with disabilities in relation to housing varies across housing tenure. While among homeowners with a disability, the likelihood of being discriminated against is only slightly higher than for people without a disability, it is considerably higher among local authority renters, and even more so among private renters.

The 2018 IHREC/ESRI research shows that people with disabilities were over twice as likely as people without disabilities to experience discrimination in access to housing. For example, people with disabilities are overrepresented among homeless people (more than one-in-four homeless people have a disability) and are more likely to experience bad housing conditions, are more at risk of poverty and deprivation and they also are more likely to be discriminated against in a series of domains, including housing.

The recent (2021) IHREC/ESRI research, *Monitoring Adequate Housing in Ireland*⁶⁸, further emphasises the challenges facing people with disabilities. It notes the significant shift in housing policy away from direct provision by the State and its agencies to an increased use of the private sector.

⁶⁶<http://nda.ie/publications/disability-supports/autism/adult-autism-in-homelessness-prevalence-experiences-and-support-needs-in-an-irish-context1.pdf>

⁶⁷Discrimination and Inequality in Housing in Ireland <https://www.ihrec.ie/discrimination-and-inequality-in-housing-in-ireland/>

⁶⁸Monitoring Adequate Housing in Ireland. <https://www.ihrec.ie/app/uploads/2021/09/Monitoring-Adequate-Housing-In-Ireland-Sept-2021.pdf>



The growth in the private rented sector and the policy shift to housing those with housing needs, including those experiencing homelessness and other vulnerable groups, in private rental accommodation supported by HAP has raised additional issues around the security and quality of housing. A number of reviews have highlighted the problem in outsourcing the housing search to groups who have limited bargaining power and who are vulnerable to discrimination, and the lack of long-term security involved...

There is a lack of information to assess how well the additional legal protection against discrimination in the housing domain has worked, and a systematic evaluation of the impacts of housing supports is warranted.

The research report suggests that the shift in provision towards private rental housing also places an increased onus on the State to address quality issues through effective regulation and enforcement.

The research points to higher rates of affordability issues amongst people with disabilities when compared to those without a disability; significantly higher rates of reported poverty after housing costs; significantly higher chances of arrears; and significantly higher likelihood of experiencing poor quality of housing, i.e. housing deprivation.

The research report emphasises the importance of monitoring in providing evidence for policy-making on deficits in meeting housing needs amongst particular groups such as persons with disabilities. However, the research identifies considerable data gaps on topics that are central for monitoring housing adequacy, including limited information on key groups in surveys and on detailed categories within groups (e.g. type of disability); limited information on key groups in government and administrative data; a lack of data on housing preferences and subjective assessments of satisfaction with housing; a lack of suitable measures for housing security; a lack of data on access to local services; and a lack of data on housing discrimination.

In addition, the report notes that data on those who live in residential settings are also uncommon, making it difficult to monitor progress on the policy of moving people with a disability out of congregated settings.

It proposes that there is a need for more disaggregated data including increased disaggregation within existing categories such as disability so that meaningful groups can be distinguished.

DFI in-house research

In March-April 2021, members of the DFI Community Team undertook surveys of people with disabilities in Cork City and County, Roscommon, Mayo and Galway City and County in order to inform their inputs to Local Authority Strategic Plans.⁶⁹ The responses⁷⁰ provide a rich snapshot of housing issues at local level. Notable findings include the following:

- Over 80% of respondents did not know that their Local Authority has a Local Strategic Plan for Housing People with Disabilities and had not been involved in public consultations or submissions.
- The vast majority of respondents lived in housing with parents or other family members.
- Over 30% of respondents said their current housing is not suitable for their needs. However, most respondents (between 74% and 83%) were not on the social housing list, despite this.
- Between 62% and 75% of respondents were not aware that Local Authorities can provide social housing to people with disabilities who qualify under a means assessment.
- Respondents were more aware (over 50%) that their Local Authority can provide a Housing Adaptation Grant in specific circumstances.
- Of those who had applied for support with housing needs, including the Housing Adaptation Grant, a significant sample indicated that the information provided was not accessible to them (26%) or that they were not adequately supported with their application (23%).

Ageing parents as carers

Figures gathered by the National Federation of Voluntary Service Providers in January 2020 found that at least 1,250 parents aged 70 years and over continued to be the primary carer for their adult son or daughter living at home and that some 400 of these are over 80 years old.⁷¹ These figures indicate starkly the need to address with some urgency the long-term accommodation needs of this vulnerable group of disabled people.

The next chapter will describe the main issues that emerged from the research carried out for this social policy report and will include some relevant case studies.

⁶⁹See DFI Submission to Consultation on New Housing Strategy, <https://www.disability-federation.ie/publications/dfi-submission-to-consultation-on-new-national-hou/>

⁷⁰For the Cork (city and county) survey, the number of people who completed the survey was 155. For the Galway, Mayo and Roscommon survey, the number of respondents was 92, giving a total of 247 respondents.

⁷¹National Federation of Voluntary Service Providers Press Release http://www.fedvol.ie/SEVERE_CRISIS_FACING_30000_PEOPLE_WITH_INTELLECTUAL_DISABILITIES_AND_THEIR_FAMILIES/Default.2266.html



Chapter Five

Addressing the Accommodation Needs of People with Disabilities: Main Issues and Case Studies

Introduction

The research carried out for this report included inviting disability organisations to submit their experiences and perspectives on how the accommodation needs of the people whom they represent and support were being met. In addition, the NAS staff members and members of the DFI community team were consulted. Case studies of individual experiences were also collected, some of which are included below.

Main issues emerging from the current research

The following were the main issues identified by research participants during the consultation and in documents reviewed and submitted as part of the research methodology.

- Notwithstanding requirements under Part M of the Building Regulations, there continues to be a significant shortage of accommodation that is fully accessible to and liveable in by wheelchair users in all housing sectors.⁷²
- While the Summary of Social Housing Assessments (SSHA) does not provide length of time on the waiting list specifically for applicants with a disability, data from one Local Authority interactive housing report indicates that people with a disability were almost 20% of those waiting for between 5-10 years.⁷³
- More than one in four people who are homeless have a disability (double the rate of the general population).⁷⁴
- The issue of homelessness for those with disabilities and mental health difficulties needs particular attention – for example, research has shown that people with an intellectual disability are 1.4% of the total population and 3.1% of the homeless population.⁷⁵
- Some younger people with disabilities are inappropriately placed in a nursing home because they could not access the support which would enable them to live in their own homes in the community—as already stated, the recent Ombudsman’s Report estimated that the number of people in such circumstances is more than 1,300.⁷⁶

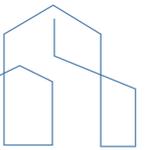
⁷²See Irish Wheelchair Association’s Submission on the Draft State Report Under the United Nations Commission of the Rights of People with Disabilities Draft <https://www.iwa.ie/app/uploads/2021/06/IWA-Submission-UNCRPD-Draft-State-Report.pdf>

⁷³Irish Wheelchair Association, Pre-budget Submission <https://www.iwa.ie/get-involved/advocacy-campaigns/our-campaigns/prebudget-2020/>

⁷⁴Discrimination and Inequality in Housing in Ireland, <https://www.ihrec.ie/discrimination-and-inequality-in-housing-in-ireland-set-out-in-new-research/>

⁷⁵Inclusion Ireland, <https://inclusionireland.ie/wp-content/uploads/2020/11/housing-position-report.pdf>

⁷⁶Office of the Ombudsman, Wasted Lives, <https://www.ombudsman.ie/publications/reports/wasted-lives/OMBWastedLives2021.pdf>



- The specific accommodation needs of people who have an acquired brain injury, a work accident or a life-altering experience are not well acknowledged or catered for under current provisions – sometimes the adaptations required to enable them to continue to live at home are not available.
- People with a disability are three times more likely to report discrimination when looking for housing compared to those who do not have a disability.⁷⁷
- The absence of suitable housing in the private rented sector coupled with poor quality housing in both the private rented sector and public housing sector and difficulty in implementing standards set out in legislation presents difficulties for many, including people with disabilities and people with mental health difficulties.
- The National Ability Support Systems (NASS) assessments of need for residential care places does not factor in the potential of supported housing in the community – this is likely to result in an over-focus on residential care and a related reduced focus on the potential of supported housing in the community and is likely to underestimate the potential of Local Authorities working collaboratively with the HSE and NGOs to provide the type of accommodation required.

Specific issues identified and related Case Studies

Housing needs assessment and establishing eligibility

People with disabilities find that they are faced with a system that is complex and difficult to navigate both in terms of establishing their eligibility for social housing support and in moving through the assessment process.

Procedures vary between Local Authorities. In many instances, there is a lack of clarity and transparency. In addition, individuals can be subjected to repetitive requests for information from the various agencies with whom they must interact. Some Local Authorities are more stringent, demanding, and critical than others in their application of eligibility criteria and in how they deal with individuals with various disabilities.

Individuals can find that their needs are not being considered in a holistic manner and that they themselves are not treated in an inclusive way by the system. Some of this may be due to the fact that there is not a strong disability housing focus in many Local Authorities.

For some people with disabilities the process is overly demanding, frustrating, and problematic to such a degree that they choose not to engage with it.

⁷⁷Irish Human Rights and Equality Commission, <https://www.ihrec.ie/discrimination-and-inequality-in-housing-in-ireland-set-out-in-new-research/>

Case Study 1

Ann is in her mid-twenties and was referred to NAS for the provision of advocacy support. Ann had made an application to her Local Authority and received a response stating that her housing needs were already met where she was living (which was with her parents). Ann was accessing ongoing supports from her Community Mental Health Team. There were difficulties arising in the family home, which were affecting her mental health, and it was felt that she needed to have her own accommodation in order to ensure that there was not a total breakdown in family relations.

The NAS advocate discussed with Ann the reasons why she needed her own accommodation and made representations to the Local Authority on her behalf. On receipt of this information the Local Authority overturned their decision and placed Ann on the housing list. This enabled her to seek accommodation in the private rental market with a Housing Assistance Payment (HAP) while awaiting Local Authority accommodation to be offered. Without advocate support it is likely that Ann would not have been placed on the housing list and would have continued to have her mental health impacted.

Planning for predictable medium to long-term accommodation need and for changing personal need

People with disabilities who are living with family at home may have a housing need in the present or may have one in the future as family circumstances change. The death or incapacity of a family carer, safeguarding or other issues can create a sudden need for a housing response. Accommodation-related issues can come to the fore quite quickly, often resulting in the individual being moved into residential or unsuitable accommodation. Age related needs or fluctuating health status can all result in a requirement for new and/or adapted accommodation and supports - this

continuum of need requires a continuum of provision response.

Failure to recognise, plan for and meet the needs arising from an individual's evolving life changes can result in people being obliged to live in inadequate accommodation or move into/return to residential care settings. There is, therefore, a need for long-term planning in situations where such events are either likely, imminent, predictable or probable.

People who acquire a disability during adulthood can face particular challenges in remaining in their own homes. This is related to difficulties in both getting the required home adaptation and getting the additional in-home supports required as a result of their disability.



Case Study 2

James had to turn down the offer from the Local Authority of a new build house. The house would not have allowed another individual to stay with James overnight if he required this in the future, as it was a one-bedroom house. It had been acknowledged by medical professionals that James' needs were likely to change in the future and that overnight staff support was likely to be needed. James was informed that he was not entitled to a house with more than one bedroom, despite the medical evidence that his needs were going to change in the coming number of years and that accommodation for support staff would be essential

Case Study 3

Marty has a physical disability and lived at home with the support of a Home Care Package. Marty has limited family support and, therefore, relies on formal support to maintain his independence. Following hospitalisation, his needs changed and the hospital could not discharge Marty to his home in the absence of additional appropriate supports being put in place. The only option presented to Marty was to go to a nursing home. Marty was adamant that this was not his will and preference.

Marty did eventually agree to go to the nursing home on a two-week basis on the understanding that this would be an interim measure until the requisite supports were put in place for him to return home. An application for an increase in funding and home help hours was submitted to the HSE. Funding was approved by the HSE and allocated to Marty for the extra supports he needs to return home. However, securing staff to provide care for Marty became the issue.

Despite receiving advocacy support, three months have now passed and Marty remains in the nursing home without a satisfactory resolution. Marty is very frustrated with the situation.

Offers of inappropriate or unsuitable accommodation

Local authorities in some instances have failed to take into account and cater for the particular needs of individuals. Individuals are offered no or inadequate options or choices. There is poor differentiation between the needs of different disabilities and different individuals.

Environmental issues such as the need for a noise-free environment, accessibility of

important services, proximity to crucial social, family or neighbourhood networks are not taken into account.

Individuals can feel pressurised into accepting offers that are inappropriate, inadequate or unsuitable.

There is, in many cases, a poor recognition of the importance of location and place in allowing a person with a disability to live sustainably as part of the community.

Case Study 4

Linda was provided with emergency accommodation by the Local Authority, which was up six flights of stairs. Linda has mobility issues and uses a crutch. There is no lift in the building. This was unsuitable accommodation for Linda in terms of accessibility. Linda required an Independent Advocate to highlight these issues on her behalf.

Case Study 5

Roisin is a wheelchair user with complex health issues who lives in a RAS (Rental Accommodation Scheme) property with her child who also has a disability. Roisin has lived in this property for a number of years. The property is not physically accessible for Roisin, who is a wheelchair user. Roisin received an eviction notice, without receiving any clear reason for same. Roisin was supported to self-advocate by NAS. Roisin has been on the housing register with her local authority for many years. Roisin was offered three placements by housing bodies, however none of these residences were physically accessible for her. Roisin was then offered a single storey accessible property, at the top of a hill by the Local Authority. Roisin would not be able to access the community independently from this house because of wheelchair accessibility difficulties.



Clustering of accommodation units for people with disabilities

There are instances of an over-reliance by Local Authorities on types of accommodation provided through disability service providers that are effectively clusters of disability-specific units. This can result in the creation of 'ghetto-type' environments that contribute little to any move toward mainstreaming and integration into the wider community.

While such accommodation options may be suitable for some people or as a transitional mechanism, their use in an indiscriminate manner is inappropriate. The accommodation requirements of people with disabilities need

to be addressed within mainstream housing policy and provision as opposed to segregated housing provision.

While community group home settings have a part to play in meeting accommodation needs, there was a perception on the part of some of those consulted during this research that there is a reluctance to reallocate staff from congregated settings to locations that are more integrated into the general community and, therefore, more distant from the staff's original place of work. Problems with mobility of staff can contribute to a continued over-use of the community group home option.

Case Study 6

Avril is in her late fifties and moved from institutional care to a community group home in the centre of her local town. She has lived there for many years. Avril often talked about moving to her own home and getting to know people outside of her disability service.

Avril's group home was closed down when urgent maintenance works needed to be completed and Avril had to move out. Avril was informed that this would be a temporary measure and was moved to another group home with people she did not wish to live with. However, this move became permanent and Avril was informed that there were no other suitable residential placements. Avril expressed a wish to move back to her local town, live independently with supports and become integrated in her local community. Avril was supported by her advocate to make her wishes known to her service provider verbally and in writing.

Avril was offered an apartment in her local town through her Local Authority but in a part of an apartment block where only other persons that used her service resided. Avril felt that this was not a true offer of independent living. Avril and her advocate therefore advanced the argument that Avril's decision to turn down this offer of accommodation should not negatively affect her application for housing. Avril is still awaiting a new offer of accommodation in her local town.

Inadequate support provision

People continue to be offered accommodation options but without the supports needed for any real degree of independent living. However, some people may not be able to take up the offer because of a lack of adequate supports while others may feel that they must accept them or have to endure a long wait for alternatives. In other instances, individuals are offered accommodation with supports, but only in settings such as community group homes. Particular difficulties have arisen with regard to personal assistant (PA) provision. Difficulties in

accessing assisted living supports, such as PAs, severely restricts the possibility of many individuals moving into sustainable living situations in the community.

Individuals with disabilities and their families, who may already be apprehensive about the individual moving to a more independent and integrative setting, are discouraged and demotivated by the absence of adequate supports.

The Disability Capacity Review (DCR)⁷⁸ provides detail regarding the shortcomings in PA and home support care provision.

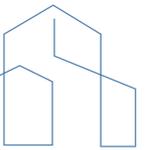
Potential nos. aged 35-64 requiring PA/home support services, and actual provision

People with a physical/mobility disability and significant difficulty in everyday activities or personal care

Source	Home support group	PA group
Census 2016 (potential)	31,000	18,000
National Disability Survey (potential)	25,000	5,000
Actual numbers getting PA, home support, 2018	8,000	2,500

Source; Disability Capacity Review Table 34. P.76

⁷⁸Department of Health (2021). Disability Capacity Review to 2032: A Review of Disability Social Care Demand and Capacity Requirements up to 2032. <https://www.gov.ie/en/publication/d3b2c-disability-capacity-review-to-2032-a-review-of-social-care-demand-and-capacity-requirements-to-2032/>



Distribution of PA Hours per Week, 2018

Hours per week Personal Assistance	No.	%
1 to 5	1,066	44%
6 to 10	584	24%
11 to 20	424	17%
21 to 40	240	10%
41 to 60	64	3%
60+	58	2%
Total	2,436	100%

Source: Disability Capacity Review Table 35. P76.

The HSE itself recognises that – “it can be a challenge to allocate care supports to dovetail with housing allocation, when both issues can

be time sensitive, i.e. uncertainty around the availability of a home or access to funding for a new or changed care package.”⁷⁹

Case Study 7

Fiona applied for housing with her Local Authority and provided information on her support needs for a two-bed apartment so that overnight support staff could be accommodated. She had previously lived in a community residential setting which was not successful as she did not like living in a multi-person household. The Local Authority approved her application for two-bed accommodation and she signed a tenancy agreement with an approved housing body.

It is now two years since she signed the lease and she is still not living in the apartment as the HSE have not provided funding for a support package. Fiona is paying rent on the apartment while waiting for the funding and support package to be provided. She is living in her parents’ home and has had three hospital admissions due to ill-health associated with her current living conditions and lack of appropriate support.

⁷⁹HSE (2020). Supporting People with Disabilities to Access Appropriate Housing in the Community; Guidance Document.

Family concerns and resistance as a barrier

Family members experience considerable fear, concern, and apprehension regarding the risks and challenges attached to a move into independent living arrangements. On occasions this leads to a resistance to such a move. Support staff and administrators have, in some instances, been reluctant to resist a family's wishes.

There is a need to ensure that the autonomy and independent wishes of individuals with a disability are fully respected by agencies and officials responsible for meeting their accommodation and support needs. The provisions for supported decision-making included in the Assisted Decision-making (Capacity) Act 2015, when commenced, will be highly important in this regard. An increased role for independent advocacy provision is also necessary.

Case Study 8

Sean was living with his father and attended a day service for people with moderate intellectual disabilities. The day service suggested supporting Sean to make an application for housing to provide for his long-term support needs as his father was becoming frail. Sean's siblings wanted Sean to be provided with a residential placement and did not want him to apply for housing and would not provide any information to support Sean's application for housing with appropriate supports as an alternative to a traditional campus type model. Sean's father died and Sean is now couch surfing between family members. His siblings continue to resist any attempts to address his housing needs and continue seeking a community residential setting for him.



Poor inter-agency collaboration

While there is evidence of examples of good practice and innovation involving Local Authorities, the HSE and the voluntary sector, such cases are often *ad hoc* and reliant on individual personalities rather than on a systematic operating framework.

Despite policy and guidance on the matter of coordination and collaboration between Local Authority staff and HSE staff, those consulted for this research have some experience of the agencies operating in a separate and non-integrated manner, to the detriment and frustration of individuals with housing needs and their families.

The new National Housing Strategy for Disabled People (NHSDP) 2022 - 2027, while re-emphasising the pivotal role and importance of collaboration within the structure of the local Housing and Disability Steering Groups (HDSGs), also points to serious shortcomings in the operation of the HDSGs over the life of the previous Strategy and the need to strengthen them if progress is to be made. The HDSGs were envisaged as being crucial in ensuring that implementation was underpinned by a strong interagency framework. It is clear that many

HDSGs struggled to remain focused, met less frequently than was required, and, in some instances had poor levels of participation. It is noteworthy that the survey of HDSG members that was conducted as part of the research⁸⁰ in preparation for the new Strategy had a response rate of 21% and reported low levels of attendance at HDSG meetings.

The need for greater clarity of roles and responsibilities between agencies, for consistency and harmonisation of processes as well as clear lines of accountability and communications is evident. Inter-agency working requires skill, collaborative processes, and a culture of cooperation. The lines of demarcation and hand-over, if any, between agencies should not impinge negatively on how the individual client experiences the overall process.

Protocols and practices to give effect to collaboration between the various bodies charged with meeting the accommodation needs of people with disabilities may not be in place or may not work as intended. Separate funding streams contribute, in part, to the problems that are evident here and the absence of integrated cross-departmental funding mechanisms undermines the principle of inter-agency collaboration.

⁸⁰The Housing Agency (2021) National Housing Strategy for People with a Disability: Collaborative Working in the Housing and Disability Steering Groups

Case Study 9

Fergus was admitted to an acute hospital with complex health issues in 2018. He remains in hospital despite his health improving. His Local Authority is awaiting confirmation regarding the funding of social care supports. However, the HSE primary care and disability service will not progress applications for personal assistance and home help until a housing offer is made. The hospital is anxious to move Fergus to a step-down facility, but he fears that he will be forgotten about if he moves there. He is very frustrated in the hospital and there has been little or no communication between the parties involved. The medical social worker cannot progress matters in terms of community social care or housing provision as they do not have budgetary responsibility for same and barriers exist to bringing all parties together.

Information provision

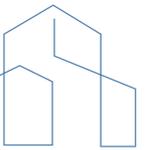
Information that is clear, accessible, relevant and consistent is crucial to how people with disabilities and their carers/supporters can move through the process of establishing eligibility and securing accommodation supports. People need information regarding options, choices, services and supports. They need to know how to go about establishing eligibility, about needs assessment, and about how their case is being progressed.

While CIB provides a range of housing information through its various channels (website, telephone and frontline services) and while information is also provided by the relevant agencies (Departments, Local Authorities and the HSE), and by many NGOs (including DFI), this does not always address the information needs of individuals. There is a perception among those consulted for this report that in many cases information regarding eligibility criteria for accommodation and

related supports for people with disabilities tends to be poorly presented, complex and very difficult to understand and grasp. In addition, the current system for making applications is itself convoluted and complex to navigate. The options available are rarely presented in a coherent and manageable fashion. Referral pathways can vary from region to region and from agency to agency.

In addition, there is poor transparency in the provision of information regarding the performance of individual Local Authorities in addressing the accommodation needs of people with disabilities. The wide variations between the situation in local areas points to a need for more consistent and detailed performance data in order to provide better transparency and accountability.

There is also a need to enhance and grow the evidence base through data collection and research in order that policy development and service provision can be assessed and improved.



Case Study 10

Cathal is 55 years old and had rented his flat for ten years. Cathal has a degenerative condition and found climbing the stairs to his flat a daily challenge. In addition, the flat was very damp and there were issues with the central heating and electrics. Cathal asked his landlord to improve the standard of his accommodation but to no avail.

Cathal had contacted his Local Authority by phone to discuss his housing needs and explained that he had literacy issues and would need support to complete the housing application form. When Cathal received the application form from the Local Authority, he found it extremely complex and not easy to read. The eligibility criteria for accessible housing was very confusing for Cathal. As a result, he did not further his housing application and continued to reside in unsafe accommodation.

Cathal's situation did not improve until he was supported in his application process by an independent advocate. He now happily resides in a home of his own that meets his needs.

It is clear that all agencies need to adopt a stronger and more proactive role to information provision, one that recognises and meets the particular challenges involved in reaching people with different types of disability and those experiencing mental health difficulties. Indeed, there is a Public Sector Duty⁸¹ to provide information in a manner which enables people to access their rights.

Agency-applicant communications

Effective communication between Local Authorities and applicants has proven problematic in many instances. A basic recognition and understanding of the situation of the person with a disability is often lacking. People have been removed

from housing lists as a result of them not responding promptly to communications, or in cases where they rejected initial offers of accommodation that they deemed unsuitable.

There is evidence that little regard has been given to the challenges that some people with disabilities experience in receiving, understanding and responding to conventional forms of correspondence. Communications may be filtered or diverted by family members. Individuals may have literacy difficulties, may not have ready access to digital technology or may not be able to afford it, or may be inexperienced or poorly informed about how official communications should be managed and responded to.

⁸¹The Public Sector Equality and Human Rights Duty is a legal obligation originating in Section 42 of the Irish Human Rights and Equality Act 2014.

Case Study 11

Jessica had applied for social housing, was on the waiting list and had indicated her priority areas. Each year the Local Authority contacted her to reconfirm her application and priority areas. Jessica has poor literacy skills and relied on her partner to read her post. It was discovered that she had not replied to recent correspondence from the Local Authority and had been removed from the waiting list.

This situation could have been avoided if contact details about reliable external supports that Jessica had been availing of had been added to the housing application, and if the support person/s had been contacted by the Local Authority when they had not heard from Jessica.

Staffing and organisational issues

There is a perception that many Local Authorities do not have sufficient or adequately trained staff for the roles connected with managing the provision of accommodation for people with disabilities. Staff turnover can result in a breakdown of continuity in dealing with individual cases and in repetitive demands for information.

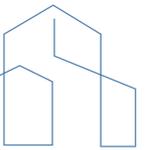
While there are cases of staff who demonstrate proactive, innovative and best practice ways of working, there is also a clear need for greater training and preparation for roles in working with people with disabilities. Disability awareness training is essential,⁸² as is training in other areas such as needs assessment. In 2019, DFI initiated a project on 'Training Local Authorities in Using the UN Convention on the Rights of Persons with Disabilities'.⁸³

The experiences of people with a disability in interacting with staff should not depend on individual staff members. Local Authorities need to ensure that the provision of accommodation supports to people with disabilities is delivered through staff that are adequately supported, resourced and trained for the task.

It is equally important that the organisational culture regarding the provision of accommodation supports to people with disabilities is positive and appropriate. The experience of NGOs is that individual Local Authorities operate in widely individual ways in both their approach and in their performance in addressing the accommodation needs of people with disabilities.

⁸²While training modules in disability are available from, for example, the NDA and a number of commercial providers, it is not clear to what extent frontline staff have participated in such training.

⁸³See *Training Local Authorities in Using the UN Convention on the Rights of Persons with Disabilities to Fulfil their Public Sector Human Rights and Equality Duty*, https://www.disability-federation.ie/assets/files/pdf/ihrec_report_final_1.pdf



Case Study 12

Ruth has a physical disability and complex health needs and sometimes uses a wheelchair. Ruth is also a parent of a child with an intellectual disability.

Ruth has lived in her Local Authority house for 20 years and this house has become increasingly inaccessible for her due to her changing needs. Ruth wants to live in a house that would be accessible for both her and her child and which would be near her family who reside in another county. This would allow Ruth and her child to avail of additional informal support from family. However, Ruth was informed that inter-county transfers are not possible.

Ruth has contacted the Local Authority on many occasions to speak with someone about her housing options and her calls have never been returned. Ruth requested to speak to the housing social worker. The social worker is on long term leave with no replacement. Ruth has written to the Local Authority requesting a meeting. Given the barriers to resolving this issue, Ruth contacted NAS and has been provided with an advocate who is supporting her in her ongoing efforts to seek a satisfactory result.

The extent to which people with disabilities and their representatives are involved in the development of strategic housing plans is perceived by those consulted for this research as varying greatly, with some Local Authorities showing very positive approaches to participation while others appear to simply 'go through the motions' on paper. The operation and effectiveness of local Housing and Disability Steering Groups is also perceived as widely varied, delivering tangible results in some locations while almost non-existent in others.

Difficulties in sustaining a tenancy

Changing personal circumstances such as as acquiring an additional disability or the progression of an existing one can, on

occasions, result in a person experiencing difficulty in sustaining a tenancy. Such 'failed' tenancies have led to individuals having to return to residential settings. They can then find that the past failed tenancy acts as a barrier to being considered for a new tenancy. The practice of tenancy-surrender when further or added disability occurs is often the default, rather than a planned maintenance and support response.

There is a need to ensure that people who are at risk of failing to sustain a tenancy are provided with the supports necessary in order to avoid the potential negative outcomes that could ensue. Similarly, there is a need to ensure that past challenges are not used as a reason to bar people from returning to independent living.

Case Study 13

Jenny was unable to get on her Local Authority housing list due to the breakdown of past tenancies. She was living in various hostels and emergency accommodation. Jenny had behaviours associated with her disability which put her at risk of losing her emergency accommodation. She was close to eviction and to becoming a rough sleeper. With the involvement of an independent advocate, a case manager was put in place for Jenny. She was then provided with a high level of support in emergency accommodation by the service, and her situation stabilised. This provided the evidence for the Local Authority that Jenny could sustain a tenancy successfully provided the right supports were in place. Jenny is now being supported to identify an appropriate HAP tenancy in her area of choice.

Issues with private rented and privately owned accommodation

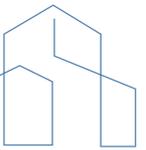
Access to the private rented sector is proving increasingly difficult, in terms of suitability, availability and affordability. Particular difficulties arise in accessing Housing Adaptation Grants because landlords do not want to carry out adaptations to their property. There is a need to develop and apply more transparent and effective mechanisms that provide support for adaptation in the private rented sector, given its importance in meeting social housing need.

Some Local Authorities are reported as having had good success in negotiating tenancy packages in the private rented sector for people with disabilities. However, such

instances appear to be the exception and are seen as having depended on innovative and proactive work by individual staff members as opposed to any systematic approach. Recent IHREC/ESRI research⁸⁴, referred to above, references the possibility that persons with disabilities are likely to experience discrimination in accessing private-rented accommodation.

Homeowners who have acquired disabilities have experienced problems in situations where their home is now unsuitable or perhaps not amenable to adaptation. Difficulties have arisen with regard to establishing eligibility and navigating the means test processes for adaptations or alternative accommodation.

⁸⁴Monitoring Adequate Housing in Ireland. IHREC/ESRI. <https://www.ihrec.ie/app/uploads/2021/09/Monitoring-Adequate-Housing-In-Ireland-Sept-2021.pdf>



Case Study 14

Eileen has been told she is eligible for HAP but cannot find suitable accessible accommodation or a landlord that will make suitable adaptations to kitchen and bathroom. She cannot privately fund these even if she could obtain permission. She thinks that social housing through the Local Authority or an approved housing body would be more appropriate for her. Her experience leads her to believe that the Local Authority does not understand that HAP approved private rented housing is not available or suitable for her needs.

Muireann wished to avail of HAP temporarily, while waiting for an offer of housing from the Local Authority. She had viewed a number of houses, but when she speaks with landlords about adaptations that need to be made to the house to accommodate her physical needs, she does not hear back from them. Muireann feels HAP is not an option that she can avail of as landlords do not want to have to make changes to their property and there is no incentive for them to do so.

Another issue identified is that people with disabilities who are well enough positioned employment and income-wise to negotiate a mortgage are experiencing substantial barriers and challenges in accessing mortgage protection insurance. While there are, in theory, ways of working around this problem, the extra effort, stress and work needed are significant disincentives to entering onto an already difficult pathway.

HIQA inspections, recommendations and requirements.

In addition to inspecting congregated settings, HIQA also carries out inspections of designated properties that may include group home settings occupied by five or more persons with disabilities. A majority of these multi-occupancy properties, as well

as very many additional properties with fewer residents, are in fact housing units within designated centres for persons with disabilities. However, for the occupants, these are indeed home and there is a valid expectation that life 'at home' will not have the trappings and conditions associated with institutional settings.

Unfortunately, recommendations arising from HIQA inspections have, on occasions, resulted in a perception, correct or mistaken, that accommodation needs to be effectively 'institutionalised' in order to meet standards. This can damage any feeling of independent living or of living in one's own home.

While such instances are rare, it is important that personal preferences and wishes of people be respected and catered for.

Case Study 15

Ben lived in low support accommodation with four others. They required very minimal intervention from their service provider. The house was located in a small cul-de-sac on the edge of a large town. Ben and the others who share this accommodation all have an intellectual disability. However, they are all very skilled in managing day to day living and were highly independent individuals. Furthermore, they enjoy living together and have formed close friendships.

Following a HIQA registration inspection of their home, Ben and the others were visited by senior management of their service provider to discuss two measures which were required to ensure compliance with the HIQA registration process. They were told that five people living together would not be approved for registration and that the property was deemed to need emergency lighting throughout in order to meet HIQA health and safety compliance.

It was proposed to them that the group would self-select two individuals to move to another property in the locality. The friends were very emotionally distressed at this requirement. They also felt the installation of emergency lighting was intrusive and they did not fully understand the need for this throughout the house. Their key message was a keen sense of being treated unfairly and disrespectfully.

A meeting between management and the group took place which provided an opportunity for the residents to have their voices heard. It was also clarified that the modifications sought were to ensure a more comfortable and health and safety compliant home. The modifications were discussed and it was agreed that emergency exit lights would be removed from bedrooms. They were left in place at the top of the stairs and over the front and rear doors. Ben and the others were happy with this compromise.

Additional issues highlighted

Social housing and people with mental health difficulties

People with mental health difficulties are often more vulnerable to homelessness. While many people with mental health difficulties live in owner-occupied accommodation, there are many who are dependent on social

housing. Suitable, stable housing is a key support to someone with a mental health condition. A suitable home in a supportive community can give a person a safe and secure environment and is important for recovery and maintaining good mental health. The quality of accommodation, its location, and security of tenure are all important aspects that contribute to other supports to



recovery, like good access to public transport and to employment.

A guidance paper, *Addressing the Housing Needs of People using Mental Health Services*⁸⁵, was published in 2012. It includes (Appendix 2) reference to a Protocol to govern liaison arrangements between housing authorities and the Health Service Executive in relation to the coordination of housing services provided for people with mental health difficulties. The Protocol sets out how the HSE works and communicates with Local Authorities on housing matters for people with mental health difficulty and sets out arrangements for regular meetings, the appointment of key support workers where required, and appropriate communications. The HSE social worker is envisaged as having a key role in linking with Local Authority housing staff.

This Protocol is important in that it focuses attention on the need for clear liaison between health and housing authorities in developing housing with support. Its provisions should be replicated for people with physical, sensory, neurological and intellectual disabilities.

Some of these factors are particularly important to people with mental health difficulties and should be given particular attention during the allocation process. The relevant factors include:

- Location is important in all housing decisions but is particularly important for people with mental health difficulties. They need to be able to access professional support services, including mental health units, therapists and counsellors.
- They may also have greater needs for informal and community support services from family and friends than others.
- The nature of the community will also be important. Some people may need a quiet, reserved environment where they are unlikely to be disturbed. Others may thrive in an active community with children and families.
- The size of the neighbourhood may be a factor for some people, in relation to how they will meet and engage with neighbours.
- Some people with mental health difficulties may be unable to drive due to effects of their medication and will need to be close to public transport services.
- Access to facilities such as a private garden space, or an open green area, or storage for tools or leisure equipment, or room for a particular pet or perhaps access to a full-size bath may be particularly important for some people with mental health difficulties.

⁸⁵Addressing the Housing Needs of People using Mental Health Services, <https://www.hse.ie/eng/services/publications/mentalhealth/housingdocument.pdf>

The concept of a 'tenancy sustainment' service has much to offer in helping people to manage difficulties around their tenancy.⁸⁶ While such services (where they exist) may initially be focused on homeless people or people at risk of homelessness, clearly they have potential to be more widely used and for people with disabilities generally living in or trying to access social housing. Indeed, many of the factors relevant to housing support for people with mental health difficulties are very relevant to people with disabilities.

Funding and shortage of suitable accommodation generally for people with disabilities

The general perception of those consulted for this research is that it is extremely difficult for people with disabilities to develop and sustain effective pathways to independent living, especially people who wish to exit congregated settings. There is a shortage of accommodation, and especially of accessible accommodation, in all housing tenure sectors. The support infrastructure for independent living is frequently inadequate. Many people with disabilities are enduring lengthy waits on housing lists even after eligibility has been established. The scarcity of appropriate accommodation, suitably located, acts in many cases as a disincentive for people to even commence the process of sourcing housing. Lack of suitable accommodation is also resulting in people with disabilities remaining longer and/or permanently in congregated settings.

Funding shortfalls

Many of the barriers, difficulties and issues identified above are, to varying degrees, connected with the issue of inadequate funding. This is further compounded by a lack of integration between the funding for accommodation and the funding for personal supports. The shortfall in funding for PA hours and other supports for independent living is a significant factor as is staffing issues. In addition, in many cases the level of funding that is made available for housing adaptation grants varies considerably and is not adequate in all instances. High quality design elements, a lifetime adaptable housing approach and a commitment to universal design principles clearly can help to ensure that housing is more likely to meet evolving needs.

This chapter has summarised the main issues relevant to housing and people with disabilities which emerged from the consultation and analysis carried out for this report. A number of case studies have been provided which illustrate the range of issues identified.

The next chapter will provide a synthesis of the key issues outlined in previous chapters and provide some discussion on and further analysis of these issues.

⁸⁶<https://www.hse.ie/eng/about/our-health-service/making-it-better/tenancy-support-service-wins-hse-excellence-award.html>



Chapter Six

Synthesis of Key Issues and Discussion

Introduction

This chapter provides a synthesis of the key issues outlined and includes some additional discussion on these issues. Such further discussion is considered important because the specific housing needs of people with disabilities could easily get lost in the context of the severe housing crisis generally facing Ireland currently and in the foreseeable future.

While many of these issues have been addressed in the recently launched NHSDP 2022 - 2027, it is reasonable to point out that the same issues were also identified in the earlier 2011-2016 Strategy, and that, as described in this Report, progress in tackling the issues over a period of more than ten years has been less than satisfactory.

Key issues identified

Need to disaggregate the people with disabilities category in identifying housing need

Securing accessible, suitable and high-quality housing is extremely challenging for people with disabilities generally, in both the private and public system. In policy development terms, it is likely that the problem is exacerbated by the use of the generic terms 'people with disabilities', 'disabled people' and a related failure to adopt an approach that adequately engages with people as individuals with a disability seeking to secure appropriate accommodation. The groups of people being targeted include:

- People who live in congregated settings
- Younger people wishing to live independently from their parents
- Adults living with ageing carers
- Persons requiring wheelchair accessible housing
- People with an acquired disability who have to reorganise their living accommodation
- Parents of a child with a disability who require additional and purpose-built space
- People experiencing mental health difficulties who require housing with support

As the experience of disability is multi-faceted, and varies over the life cycle, there is no one-size-fits-all model. For example, the housing and related support needs of a person with an intellectual disability are typically very different from those required by a person of working age with a physical disability.

Reliance on the private rented sector

Reliance on the private market for social housing fails to meet the needs of single people with disabilities as this market tends to build mainly family homes. For example, the Simon Communities Locked Out report⁸⁷, which looks at the availability of housing for people on rental supports, found that just four properties were available within standard

⁸⁷https://galwaysimon.ie/wp-content/uploads/Locked-Out-of-the-Market-April-2021_Full-Report.pdf



housing assistance payment (HAP) limits for a single person and just six two-bedroom units within standard HAP rates for a couple/one parent and one child across all 16 study areas.

The private rented sector has now clearly assumed equal importance with other housing tenures, especially owner-occupation. Its role in social housing provision will almost certainly continue to grow until the increased supply of housing to be provided under *Housing for All* fully comes on stream.

People with a disability forced to rely on the private rental sector⁸⁸ experience multiple difficulties, including:

- The general shortage of private rental accommodation in both urban and rural areas and related spiralling market-driven rents
- Poor quality housing in the rented sector and difficulty in implementing standards set out in legislation⁸⁹
- Little in the way of security of tenure, leading to housing instability which is further compounded by lack of individualised supports
- Difficulty in getting appropriate adaptations carried out in a timely manner, sometimes arising because of the unwillingness of landlords to adapt their property

Issues with Local Authority housing

Local Authority housing tenants frequently continue to live in accommodation of poor quality where standards are often lower than the legally defined standards for rented housing.⁹⁰ There is no national timetable for the refurbishment of Local Authority housing stock, which means that older tenants, including those with an acquired disability will have to continue living in poor quality accommodation.

The Housing Assistance Payment (HAP)

People with disabilities looking for a home in the rental market under HAP frequently cannot find one that meets their needs. There is some evidence that - notwithstanding the 20% discretion on the limit which was increased to 35% in July 2022 applying to new and existing HAP tenancies - HAP thresholds are still too low in some areas. Another major difficulty with HAP is that of tenants being obliged to make top-up payments. The latter frequently puts severe financial pressure on low-income households and inevitably causes hardship. Also, if a family is availing of HAP, they are then considered to have their housing need met – this is a particular issue where a child is born with or acquires a disability.

⁸⁸It should be noted that since 2016 a landlord cannot discriminate against a person in receipt of Rent Supplement, HAP or any payment under the Social Welfare Acts.

⁸⁹S.I. No. 137/2019 - Housing (Standards For Rented Houses) Regulations 2019, <http://www.irishstatutebook.ie/eli/2019/si/137/made/en/print>

⁹⁰Local Authorities and certain housing bodies have to adhere to different requirements regarding laundry, food preparation and storage facilities.

Accommodation and household costs

The housing costs relating to disability (e.g. house adaptations, additional heating costs associated with some types of disability, house maintenance) are significant and need to be fully researched. Some of these issues have been previously highlighted in *The Right Living Space*⁹¹ but have not been addressed.

The importance of enabling all people to have more choice and control over their place of residence and where and with whom they live should be a core consideration in providing for the additional costs of disability. This means that people should not be obliged to live in a particular living arrangement. Inherent in this is an acknowledgement that people with disabilities should have the support (both Personal Assistance and home support) necessary to support living and inclusion in the community and to prevent isolation or segregation from the community. For many people, the additional costs (over and above what is provided by the State) of buying Personal Assistance and other supports for independent living may be very significant and such additional costs need to be provided for by the State.

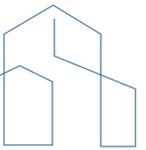
Assistive technology

As is widely acknowledged, technology has the potential to make life significantly better for people with disabilities by enabling them to maintain their independence and to live full lives. Much of the technology that can enhance independent living already exists. There is potential for more proactive development and application of the undoubted potential of technology to support independent living. While this can be a significant factor in enabling independent living, the costs of accessing appropriate technology are prohibitive for many. There is insufficient Government funding for Assistive Technology, including the maintenance of this technology once it is in place (neither the HSE nor Department of Housing have a budget line for this). There is little co-ordination or joint working in this important area of using technology to enhance independent living.

A 2016 Discussion Paper, published by DFI and Enable Ireland, *Assistive Technology for People with Disabilities and Older People*⁹² highlighted the crucial role of Assistive Technology (AT), when used appropriately, in supporting people with disabilities and older people to exercise their human rights, to live independently and to become more active members of society.

⁹¹ See *The Right Living Space: Housing and Accommodation Needs of People with Disabilities*, <https://www.disability-federation.ie/download/legacy/Full%20Report.pdf>

⁹² *Assistive Technology for People with Disabilities and Older People A Discussion Paper*, <https://www.enableireland.ie/sites/default/files/publication/AT%20Paper%20final%20version.pdf>



Accessible transport

The availability of accessible transport is a key factor in relation to people with disabilities being able to live independently in the community, particularly in rural areas. Because some people with disabilities cannot or choose not to drive, planners need to ensure that important services and amenities are integrated with residential developments and are accessible via a comprehensive and fully accessible public transport system.

Responding to the housing needs of a diverse population of people with disabilities

Responding to the housing needs of a diverse population of people with disabilities involves providing a wide range of possible options, thereby ensuring greater individual choice. The provision of 'appropriate housing' must include provision for whatever supports are necessary to ensure that a person can sustain as independent a life as possible.

- Housing design needs to be more adaptable to allow for life changes so that people can continue living in their own communities for as long as possible.
- A lack of multi-annual funding and inter-agency co-operation inhibits the development of strategic service planning and delivery. One outcome of this is that there is an uneven geographical spread of support services.
- People with disabilities should be more central to service planning and delivery through tailored responses to assessed housing and related support needs. The diversity of the population of people with disabilities and the complexity of planning and delivering housing to meet these needs should be acknowledged.
- The principles of universal design have the potential to ensure that housing is more suitable for all, including people without disabilities, and that individual requirements over the life course could be more easily met rather than having to rely on retrofitting or the necessity to move house.

Planning for the diverse housing needs of people with disabilities

Housing options for people with disabilities should include a mix of different arrangements—both one-person, couple and multi-person accommodation. Accommodation should generally be situated close to amenities and retail outlets with easy access to social and health care facilities in order to maximise independence.

On the positive side, there is a range of successful accommodation options already in existence albeit in very limited numbers. These and other new and innovative options should be significantly expanded and funded in order to provide further choice options for the future.

Framing the housing issue within a human rights framework

Due to the lack of accessible housing and the lack of visibility of people with disabilities in discussions on mainstream housing and homelessness, they struggle with a range of housing related issues on a daily basis. The significant lack of appropriate housing for people with disabilities, be it social, affordable, private rental or privately purchased housing, is an ongoing crisis within the overall housing crisis.

Since progress to date has not kept pace with either actual housing needs or targets, there is a need for a wider engagement on the matter at societal, political and governmental levels. This dialogue needs to be located within a human rights framework within which people's right to adequate housing is a core component of citizenship as well as reflecting the provisions of Article 19 of the UNCRPD. The resource implications of direct social housing provision by Local Authorities are of course significant but may not be as great in the longer-term as those involved in the current approach with an over-reliance on the private sector.

For households with below average or average incomes (most people with disabilities), there is clearly an affordability issue, most notably in Dublin, as competition from medium and high-income households is squeezing them out of the market – this issue applies to both people reliant on state support and others on low income but not entitled to state support.

Components of good practice in housing provision for people with disabilities

Diagram 1 outlines nine good practice components of a comprehensive response to addressing the housing needs of people with disabilities: strategic development by central government; inter- Departmental co-ordination; collaborative structures at local level; assessment of need protocols and the implementation and monitoring of same, related comprehensive data collection and analysis; the implementation in practice of a person-centred approach and a related personalised budgets approach with individualised housing and housing support plans; the building of integrated communities fully inclusive of people with disabilities; the provision of easily accessible information, advice and independent advocacy; and an integrated case management approach.

Strategic direction by central government

A stronger strategic approach is needed at central Government level in order to: (a) ensure oversight of local processes; (b) aggregate overall housing need; (c) agree the budget allocation required across Departments; and (d) standardise these across local authorities, eliminating the current 'post code lottery' experienced by people with disabilities. This approach is needed to ensure the resources assigned for both health and social supports *and* housing are sufficient and aligned, and that people with disabilities can have confidence that the 'system' can comprehensively plan for and deliver on their housing needs.



Diagram 1:
Key components of good practice in housing provision for people with disabilities



Inter-Departmental co-ordination

The key components of good practice in housing provision for people with disabilities – quality, choice, person-centred, user participation in planning and delivery, accessibility, timely availability – require strong inter-agency collaboration at local level. There was a broad consensus among those consulted for this report that there needs to be a much more effective collaboration in practice, liaison and sharing of information involving both HSE and Local Authorities. This is reflected in the new Strategy with one of the core themes relating to interagency collaboration and the provision of supports. In order to facilitate this, closer collaborative planning at senior level and stronger coordinated budgetary integration between the Department of Housing and the Department of Health is essential.

Local integration structures (Local Authority/HSE/NGO/Private)

Difficulties experienced by people with disabilities in accessing suitable housing in the community arise, at least in part, from a lack of joined up thinking in the provision of accommodation and support at local level. There is evidence of Housing and Disability Steering Groups operating very differently across the country – some are active and effective, while others function only minimally. HSE-Local Authority collaboration is reported as being very weak in some areas. Also, for example, feedback from those consulted for the present report suggests that the *Protocol Governing Revenue Funding*

for Health Service Related Support Costs for projects provided by Approved Housing Bodies for People with a Disability (Appendix 7 in current Strategy) is not being implemented across the board. Neither is it clear whether or not the Protocol has been reviewed periodically as provided for in Paragraph 10 of the Protocol.

The delivery of the required housing and related supports infrastructure at local level in the future will depend on an innovative and stronger collaborative approach between all stakeholders, including the Department of Housing, Local Government, and Heritage, Department of Health, Local Authorities, HSE and the Approved Housing Body sector.

Comprehensive assessment of housing/support needs

The consultation carried out for this report indicates that there is a wide variation amongst Local Authorities in discharging their obligations. While a number of Local Authorities make genuine efforts regarding service delivery and with regard to facilitating participation by people with disabilities, others are perceived as less effective. It appears that in some instances problems arise from a shortage of staff, staff turnover and lack of training in dealing with people with disabilities.

The extent to which the National Guidelines for the Assessment and Allocation Process for Social Housing Provision for People with a Disability⁹³ are being fully implemented is also unclear. Indeed, there is a perception that HSE criteria for provision of support are somewhat

⁹³ National Guidelines for the Assessment and Allocation Process for Social Housing Provision for People with a Disability,



vague and lacking in precision – this is almost certainly related to the issue of funding.

A lack of comprehensive data on the housing needs of persons with disabilities at local level impacts negatively on future planning for housing and other essential supports. A key problem is that the NASS (a Health Research Board database of service users who were previously registered on the National Intellectual Disability Database (NIDD) and the National Physical and Sensory Disability Database (NPSDD) which operated up to 2018) identifies future need for residential places but does not refer to future need for housing with support in the community. This suggests an under-recognition of the potential of housing with supports to enable people to live in the community.

Person-centred planning

While person-centred planning would be greatly enhanced by a personalised budgets approach, the policy emphasis in recent years on a Personalised Budgets approach to enable people to live independent lives⁹⁴ has only been implemented on a pilot basis. While a Task Force on Personalised Budgets was established in 2016 and reported in June 2018, and a pilot programme was initiated in 2019 to run up to the end of 2021 (since extended due to Covid-19), there is no timeline given for mainstreaming the Personalised Budgets approach.

Frequently, the supports required for independent living are not strictly associated with housing *per se* but are those that enable independent living. There is a need to fully implement a more person-centred approach within a social context of disability, facilitating supports where necessary, in the individual's own home. People who acquire disabilities as they age should clearly be enabled to remain in their own homes through better universal design and streamlined access to adaptation grants.

Building integrated communities

The concept of integrated communities⁹⁵ based on shared rights, responsibilities and opportunities is particularly relevant in the context of addressing the housing needs of people with disabilities and people with mental health difficulties. It is somewhat similar to the approach adopted in both the current National Housing Strategy for Disabled People and previous strategy. However, it is broader in the sense that it focuses on inclusivity and on the provision of a wide range of options, including standard housing, supported/sheltered/clustered housing and innovative provision of residential care for those who need it. It requires more integrated and mixed social housing generally, different models of community living for those currently living in group homes and additional housing supports, particularly for people with an intellectual disability and people with mental health difficulties. It is based on an underlying

<https://www.housingagency.ie/sites/default/files/2019-05/Guidelines-Housing-People-Disability-2017.pdf>

⁹⁴ CIB Submission on Personalised Budgets, https://www.citizensinformationboard.ie/downloads/social_policy/submissions2017/Personalised_Budgets_CIB_Subm_Oct2017.pdf

⁹⁵ See, for example, UK Integrated Communities Action Plan, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778045/Integrated_Communities_Strategy_Govt_Action_Plan.pdf

principle of equal rights, particularly for those who are marginalised, whose voices are not always heard. The underlying ethos of the 'building integrated communities approach' is that people should feel empowered to play a part in their communities and have a real say over the decisions that matter most to them in their local area, including how neighbourhood services are provided and facilities are used.⁹⁶ The concept of local area co-ordination⁹⁷ (which draws on the strengths, skills and abilities of local individuals, families and communities) is one that warrants further consideration in this context.

Access to comprehensive information, advice and advocacy support

As already stated, information about housing options and supports is not always as accessible as it needs to be. The information pathway can be difficult for people with disabilities to negotiate with the result that many people with disabilities have limited or no access to the information that they need.

Individualised housing and housing support plans: a case management approach.

There is a clear need for a stronger integrated case management approach to meeting the housing and related support needs of some people with disabilities, that is, those who are unable by themselves to find suitable accommodation and/or to live independently without support.

The main component of a case management approach is a Case Manager/Key Worker working with or on behalf of an individual in order to:

- Assist a person to negotiate the frequently complex pathway to securing appropriate housing
- Assist people with different needs to access different services and supports in accordance with their needs
- Facilitate and support the transition to new accommodation
- Facilitate linkages between agencies and professionals to ensure the appropriate support package is in place
- Ensure that services are in place for residency sustainment and providing necessary supports for daily living
- Facilitate key transitions and attitudinal change where required

It is suggested that the mechanisms in place to support people experiencing mental health difficulties to sustain housing tenancies should be extended to include people with disabilities generally, and, specifically, those with an intellectual disability and those with an Autism-related condition.

⁹⁶ See DFI Submission to Consultation on New Housing Strategy, <https://www.disability-federation.ie/publications/dfi-submission-to-consultation-on-new-national-hou/>

⁹⁷ Local Area Coordination: NDA Briefing paper, <https://nda.ie/nda-files/NDA-Local-Area-Coordination-Briefing-paper-PDF-format-.pdf>



Chapter Seven

Proposed Policy Action Framework and Recommendations

Introduction

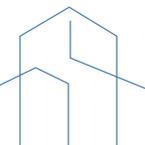
This chapter sets out a policy action framework for addressing the main issues identified and difficulties arising on a day-to-day basis. It also provides a number of specific recommendations for consideration.

Table 8 below sets out the main issues affecting access by people with disabilities to appropriate accommodation. It identifies the specific difficulties encountered under a number of headings and sets out some recommendations for addressing them.

Framework for addressing the accommodation needs of disabled people

Table 8: Addressing the accommodation needs of people with disabilities

Issue	Difficulties	Addressing the Issues
Shortage of suitable accommodation	Poor supply in all categories; Poor application of building standards; Restricted options; Disincentive effect of poor supply; Difficulty in accessing private-rented sector; Cost of rental.	Improved application of a design for all approach; Enforcement of building regulations; Dedicated funding streams; More stringent social housing target-setting; Funding of innovative approaches to widening supply; Incentives for landlords to adapt properties; A quota of new houses to be built to wheelchair liveable universal design standards.
Housing needs assessment and establishing eligibility	Complex and difficult system; Procedures vary as between local authorities; Varying degrees of stringency; Repetitive demands for information; Lack of inclusivity; Long social housing waiting lists; Danger of people opting out due to demands of the process and/or length of time waiting; People getting knocked off the waiting lists due to short timeframe for confirming or re-confirming eligibility; Inadequate appeals mechanisms.	Better streamlining and standardisation of processes across the areas of housing, health and social protection; Transparency regarding eligibility criteria; Inter-agency coordination; Advocacy support; Inclusive person-centred assessment of need; More disability awareness training for all public services staff engaging with people with disabilities and people with mental health difficulties.



Issue	Difficulties	Addressing the Issues
<p>Planning for predictable medium to long-term accommodation need. Provision for changed housing and support needs</p>	<p>System not effectively coping with evolving and changing needs of individuals, resulting in sudden and often inappropriate or retrograde accommodation options being implemented; Danger of readmission into residential care or being inappropriately 'placed' in a nursing home; Ageing in place not prioritised in policy.</p>	<p>Continuum of provision to meet the wide range of needs; New models of provision; Long-term planning to anticipate changing housing and support needs; Change from crisis mode of provision; Enhanced partnership with the NGO sector; Resources allocated in accordance with level of need.</p>
<p>Offers of inappropriate or unsuitable accommodation</p>	<p>Failure to take account of particular needs; Poor differentiation between the needs of differing individuals and differing disabilities; Poor understanding or awareness of disability among some Local Authority staff; Environmental matters disregarded; Little account taken of location, family and social networks; Pressure on individuals to accept an inappropriate offer of accommodation because of fear of being removed from the waiting list.</p>	<p>Personal circumstances, preferences and needs to be taken into account; Holistic and integration-oriented approaches; Recognition of environmental and locational issues; Recognition of importance of social, family and community networks.</p>
<p>Clustering of accommodation units for people with disabilities</p>	<p>Over-reliance on disability-specific centres of accommodation; Poor mainstreaming and integration into the community; Problems in reassigning support staff from institutional locations to community-located settings.</p>	<p>Consultation and collaborative working with community and disability organisations; Move towards greater mainstreaming and integration within social housing provision; A stronger focus on what a person-centred approach means in practice.</p>
<p>Inadequate housing support provision</p>	<p>Accommodation offered without the necessary supports; Difficulty in accessing Personal Assistant supports; Families not adequately supported to facilitate a move by a member with a disability to independent living.</p>	<p>Provision for Direct Payments to individuals; Uniform provision and entitlement to PA supports; Stronger inter-agency collaboration. Introduction of a 'Cost of Disability' payment.</p>

Issue	Difficulties	Addressing the Issues
Family concerns and resistance as a barrier	Family members' concerns as a barrier to facilitating move by a person with a disability into independent accommodation; Agency staff reluctance to go against family wishes; No access by disabled person to an independent advocate.	Recognition of rights and entitlements of individual with a disability; Provision of independent advocacy support; Provision of adequate accommodation supports; Staff training; Better supports for family members acting in a caring/support role.
Poor inter-agency collaboration	Insufficient coordination between local authorities, HSE and voluntary organisations; Lack of clarity regarding roles and responsibilities; Lack of continuity and integration between agencies' interactions with clients; Poor levels of cooperation in some instances.	Clarification of roles, responsibilities and inter-agency collaboration mechanisms; Engagement from all agencies at a sufficiently senior level; Staff training; Policies and processes to monitor and ensure effective client-centred actions; Clarity regarding funding streams and sufficient funding; Development of an appropriate organisational ethos for working with persons with disabilities.
Information provision	Difficult to access information on housing options, assessment criteria, progress of applications; Complex and difficult-to-understand processes; Variations in information and approaches as between locations; Poor levels of transparency and data regarding performance at a local level.	Provision of adequate, comprehensive, and accessible information; Elimination of inter-agency and inter-regional discrepancies and variations; Publication of performance data; Setting of clear, measurable delivery targets to monitor progress and publication of same.
Agency-applicant communications	Problematic in many instances; Poor recognition and acceptance of challenges facing applicants in dealing with bureaucratic administrative information and communications; Danger of applications being rejected due to the lack of disability-sensitive engagement with applicants; Communications filtered or diverted by family.	Critical reassessment of information-giving processes and content; Development of communications processes and channels that are sensitive to the challenges faced by individuals; Sensitivity in decision-making to the communication and support needs of people with disabilities; Involvement of advocacy supports.



Issue	Difficulties	Addressing the Issues
Staffing and organisational issues	<p>Inadequate staffing provision; Staff turnover; Lack of staff training in disability awareness, needs assessment; Varied organisational culture regarding disabled people; Risk averse tendency by agencies; Mixed performance in consultation processes; Mixed impact of Housing and Disability Steering Groups.</p>	<p>Adequate staffing levels and commensurate funding; Staff training and awareness building; Reviews of organisational culture; Development and application of processes that are genuinely participative, inclusive and disability sensitive. Standardisation of best practice nationwide; Monitoring and related standardisation of Housing and Disability Steering Groups.</p>
Difficulties in sustaining a tenancy	<p>'Failed' tenancies; Tenancies inadequate or inflexible for evolving needs; Impact of 'failed' tenancies on future social housing offers; Poor tenancy support mechanisms.</p>	<p>Provision of adequate tenancy maintenance support mechanisms; Actions to ensure that 'failed' tenancies are not used as a reason for future barriers to accommodation provision; Application of building standards that are more conducive to changes in tenant needs.</p>
Private rented sector and privately owned accommodation issues	<p>Difficulty of access to private rented sector; Difficulties in accessing adaptation grants; Difficulty in negotiating appropriate tenancy arrangements; Homeowners with acquired disability experiencing difficulty in navigating means testing; Barriers to getting mortgage protection insurance.</p>	<p>Clarity and transparency in establishing eligibility; Effective mechanisms for supporting private-sector providers entering or remaining in the disability housing provision sector; Encouragement and enabling of innovative approaches aimed at involving the private sector; Reform of means-test for housing adaptations; Incentivising the private rented sector to carry out adaptations; Structured responses to mortgage protection insurance issues.</p>
HIQA inspections, recommendations and requirements	<p>Negative impact of HIQA inspections and requirements on residents in community-group homes; Institutionalisation of community-based accommodation units.</p>	<p>Clarity regarding the requirements identified by HIQA; Resources to organisations to enable them to meet HIQA requirements; Recognition of the need to differentiate between institutional settings and various types of group home settings.</p>

Issue	Difficulties	Addressing the Issues
Difficulties for people with mental health difficulties	Unsuitable location of accommodation offered; Poor access to facilities, services and public transport; Problems regarding the nature of the accommodation provided; Tenancy sustainment issues.	Need to give full consideration to individual needs; Greater involvement of support staff; Tenancy sustainment supports.
Funding	Lack of integrated or sufficient funding streams for housing with supports; Inadequate Housing Adaptation Grants.	An integrated and significantly increased cross-Departmental budget for housing and related supports for people with a disability/mental health difficulty; An increased budgetary allocation for Housing Adaptation Grants and reform of maximum grant and means test.

Policy recommendations

General

- There is a clear need for more detailed, disability-specific data regarding, for example, the length of time that applicants with disabilities have remained on the waiting list, the age of applicants with disabilities, and/or their present situation accommodation-wise.
- Greater clarity of roles and responsibilities between agencies is required as well as consistency, and harmonisation of processes and clear lines of accountability and communications.
- Stronger collaborative processes are required based on a culture of cooperation in order to ensure that individuals who require housing support receive it in a timely, accessible and person-centred manner.

- There is a strong need for enforceable protocols and practices that will require effective collaboration between the various bodies charged with meeting the accommodation and support needs of people with disabilities.
- Integrated and adequate cross-departmental funding mechanisms are required to underpin and promote inter-agency collaboration. There is also a need for sufficiently senior involvement within agencies and strong practice oversight.

Implementing the National Housing Strategy for Disabled People 2022-2027

While the new Strategy sets out welcome principles, objectives and planned actions for meeting the accommodation needs of disabled people, it is necessary to re-emphasise the importance of applying special focus and attention to those areas in



which the previous Strategy did not deliver adequate results. There is a real need for robust implementation, if the new Strategy is to be successful.

Specific areas that need to be addressed in the implementation of the Strategy include:

- A clear and standardised *modus operandi* for all Housing and Disability Steering Groups needs to be put in place with effective monitoring of performance.
- A clear communications plan should be developed with the aim of making people with disabilities aware of their housing rights and entitlements, including a page on each Local Authority website providing clear easy to read accessible information, and a process map for accessing housing and related supports.
- Provision should be made for additional take-up of disability-awareness training (and the housing and support implications of various types of disability) for all staff working on disability and housing matters – including front office staff dealing with applicants, managers, architects and planners.
- There should be a designated co-ordinating role on housing and disability in each Local Authority, modelled on, and learning from, the Mental Health Housing Coordinators and Age Friendly Housing Technical Advisor roles.
- There should be stronger accountability mechanisms in respect of local delivery of social housing for disabled people and people with mental health difficulties, including:
 - Detailed annual reporting by Local Authorities related to agreed targets in respect of implementing the new Strategy
 - Information published on each Local Authority website on annual delivery, number of people on waiting list, length of time that people are on the waiting list etc. (see Galway County Council model cited earlier)
- There should be a regular, consistent and systematic practice of coordination and collaborative planning across agencies at sufficiently senior level (in particular Local Authorities and the HSE) in order to overcome blockages and resolve problems. This is necessary in order to ensure that health and social support packages are available and aligned with housing offers coming on stream.⁹⁸

⁹⁸ This should build on the HSE Guidance Document, Supporting People with Disabilities to access Appropriate Housing in the Community, <https://www.hse.ie/eng/services/list/4/disability/congregatedsettings/guidancedoconhousingoptions.pdf>

Housing for All

- The commitments in *Housing for All* relating to housing provision for people with a disability should be fully delivered in accordance with the proposed implementation structures and timelines, and in detailed consultation with the disability sector.

Mainstreaming disability housing policy

- Disability housing policy should be fully mainstreamed so that supply, design and accessibility are considered, and built into requirements, in *all* areas of housing policy and planning – this is a vital component of building integrated and sustainable communities.

'Whole of Government' approach

- The frequently referenced 'Whole of Government' approach is hugely important, particularly for people who require financial or health and social care supports for daily living and must be implemented in practice. This must include agencies responsible for developing the social, amenities and transport infrastructure in local communities as well as health and housing authorities.

Increased social housing delivery for people with disabilities

- The commitments to meeting the accommodation needs of people with a disability⁹⁹ as outlined in sections 7.1 – 7.6 of *Housing for All* and repeated in the National Housing Strategy for Disabled People 2022-2027, must be rigorously implemented.
- Significantly increased social housing delivery for people with disabilities and people with mental health difficulties is required – the current waiting times are not acceptable from either social inclusion or human rights perspectives.
- There should be provision for a maximum time on the social housing waiting list and annual reporting against those targets.

Life-time adaptable housing

- A future-proofing approach to housing provision for people with disabilities should be adopted, based on life-time adaptable and Universal Design principles and the Irish Wheelchair Association Best Practice Access Guidelines (4th Edition)¹⁰⁰ – this will result in less need for retrofitting and better provision for a changing demographic structure arising from an ageing population.
- There should be provision for a quota of wheelchair liveable housing.

⁹⁹ See Housing Policy Objective 7. Increase and Improve Housing Options for People with a Disability in *Housing for All* (2021) DHLGH, accessed at <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

¹⁰⁰ Irish Wheelchair Association Best Practice Access Guidelines, <https://www.iwa.ie/access-guidelines/best-practice-access-guidelines-4/>



The pathway to housing

- A clear process map and related pathways and information should be made available showing step-by-step points across different areas of access to appropriate housing by disabled people – renting, social housing, adaptation, planning for future housing needs, building an accessible house – should be publicly available and easily accessible.

Capacity-building for Approved Housing Bodies

- Additional research should be carried out on the role of the non-profit and voluntary housing sector in meeting the requirements of people with disabilities and on the relative merits of the various models of support housing which are now operational.
- Approved Housing Bodies have an excellent track record in the area of specialist housing and can play a pivotal role in providing people with a real choice – this contribution should be further incentivised through better funding.
- Enhanced funding from the Voluntary Capital Assistance Scheme should be granted to housing agencies which are building to the standards of Lifetime Adaptable Housing and providing housing with supports.

Housing standards

- More resources should be provided for the inspection of accommodation (private and public) provided under social housing policy generally and, particularly, where such accommodation is occupied by people who may need additional supports, including people with disabilities and people with mental health difficulties.

Building integrated communities

- The concept of liveable communities (one with affordable and appropriate housing and supportive community features and services) should be re-visited to include appropriate housing provision for families and people with disabilities, and to support ageing in place.
- At Local Authority level, there should be much greater emphasis on including communities, tenants and owners in design, delivery, and management of social housing. This is provided for in the new Strategy but requires strong implementation if it is to be meaningful in practice.

House adaptations

- More resources should be provided for the Housing Adaptation Grant for Older People and People with a Disability.
- The Grant should be modified to:
 - Provide for a higher maximum grant of €60,000
 - Limit the means test to the income of only the disabled person
- The grant should be extended to the occupants of new houses, those building their own homes and those renting in the voluntary/non-profit housing sector who have security of tenure.
- The cost of disability should be factored into the means test for the grant.

Assessment of housing need

- All future national assessments of housing needs by Local Authorities should explicitly address the housing requirements of those living long-term in residential centres, those inappropriately placed in nursing homes, those living with ageing parents and those who wish to live separately from their parents.

Private rented housing sector

- The private rented sector should be an option of secondary resort for social housing rather than of first resort as is the case at present.
- There should be a policy target of ensuring that no person with a disability or a mental health difficulty has to rely on the private rented sector for social housing.
- There should be specific provision in affordable housing policy to enable people with a disability or a mental health difficulty to purchase affordable accommodation that meets their needs.

Conclusion

The National Housing Strategy for People with a Disability 2011-2016 (extended to 2021) was a significant step forward and has performed an important function by reflecting rights-based thinking about disability, with the move towards de-congregation and inclusive community living. It has clearly brought about some necessary improvements, including a somewhat more consistent approach, new structures and processes at Local Authority level including the Housing and Disability Steering Groups and Strategic Plans, structures at national Level including the Housing Sub-Group, the gradual improvement of the level and amount of relevant data being recorded and some specific wins such as changes to application forms.



There have been some important advances in encouraging independent living and community participation for people with disabilities. The continued move away from congregated settings, both for people with disabilities and those with mental health challenges, notwithstanding the slow pace of implementation, is a welcome and positive development. Despite these individual improvements, however, the Strategy did not substantially improve the housing situation or options available to people with disabilities¹⁰¹. Many of the aims and objectives of the outgoing strategy remain centrally relevant and need to be delivered.

The policy emphasis on accommodating people with disabilities to live independently in the community did not work as envisaged in the 2011-2016 Strategy. If the new Strategy is to deliver on its intent, its implementation will need to be focused and related to clear identifiable targets and outcomes. Much has changed since *The Right Living Space* was published and since the outgoing Strategy was put in place which has brought about many positive and welcome changes. However, there continue to be major structural, funding and attitudinal barriers to people with disabilities having homes in mainstream community settings and insufficient innovation and inter-agency collaboration to progress strategic intent in this important area.

The many difficulties highlighted throughout this report relating to people with disabilities should be considered in the broader context of current housing issues in Ireland, in particular, inadequate social and affordable housing provision generally. Over-reliance on the private rented sector for social housing and ongoing insecurity of tenure for tenants in that sector and a consequent risk of homelessness compound this shortage. The length of time that some people spend on social housing waiting lists (in some cases over 10 years) is a significant issue.

Overall, there must be a significant move away from addressing the housing needs of people with a disability only when these become a crisis. Needs should be assessed early and plans should be made to proactively build housing for an increasing disabled population into the future.

There is universal acknowledgement that the provision of housing generally is a major challenge in Ireland today. This general shortage of accommodation is further compounded for people with disabilities and mental health difficulties by the shortcomings in the stock of accommodation that meets their particular needs.

¹⁰¹ See, for example, DFI's submission on the Draft State Report on the UNCRPD - in particular the section on Article 19. https://www.disability-federation.ie/assets/files/pdf/dfi_state_report_submission.pdf.

Effective steps to meet these needs will demand innovative and proactive measures involving social housing provision, facilitating easy access to the private rented sector in the short-term (where no public housing options are available), and through supports aimed at enabling older people to age in place in their own homes and those currently in residential care to move to accommodation of their choice.

While some degree of progress has been made in meeting the accommodation needs of people with disabilities, a wide range of issues continue to be of major concern. There is a real need to create a more effective linkage between the aspirational policies at national level and the reality of practices at local level.

The focus of the new Housing Strategy for Disabled People 2022 – 2027 on developing innovative and creative models of delivery should be based on the premise that there is no 'one-size-fits-all' model of delivery to cater for the very wide-ranging housing and support needs of different categories of disabled people.

The commitments in *Housing for All*, both generally and in respect of disabled people, are significant and provide the platform for moving forward and ensuring that the housing needs of people with disabilities are a central policy concern.

People with disabilities and people experiencing mental health challenges are evidently a widely diverse population frequently requiring individually tailored housing responses. Article 19 (a) of the UNCRPD requires the development of a fully inclusive housing strategy for disabled people –

Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement.

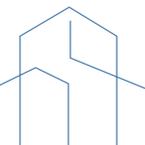
Delivering on this is clearly a huge challenge in the context of the current overall social housing situation in Ireland. However, there are examples of where the response has been both creative and appropriate and where there has been a positive impact on the lives of people with disabilities. The payback is a more equal and inclusive society for those with a disability and those with a mental health difficulty. The new Housing Strategy for Disabled People sets out an important and creative roadmap – it needs to be fully implemented.



Appendices

Appendix 1. Number of Households on Social Housing Waiting Lists on Basis of Disability and Comparison Data Census 2016. SSHA 2020.

County and City	Total Population 2016	Total Number of Disabled People 2016	People with Disabilities as % of Total Population 2016	Total Housing Need 2020 (Households)	Housing Need Disability 2020 (Households)	Housing Need Disability as % of Total Housing Need 2020	Housing Need Disability as % of Total Population	Total Households 2016	Housing Need Disability as % of Total Households
State	4,761,865	643,131	13.5	61,880	5,057	8.2	0.11	1,702,289	0.30
Carlow	56,932	8,237	14.5	505	102	20.2	0.18	20,537	0.50
Cavan	76,176	9,508	12.5	584	29	5	0.04	26,899	0.11
Clare	118,817	15,369	12.9	1,202	144	12	0.12	43,469	0.33
Cork City	125,657	22,722	18.1	3,953	285	7.2	0.23	49,411	0.58
Cork County	417,211	52,659	12.6	2,470	245	9.9	0.06	146,442	0.17
Donegal	159,192	22,955	14.4	924	66	7.1	0.04	58,505	0.11
Dublin City	554,554	81,502	14.7	14,001	202	1.4	0.04	211,747	0.10
Dún Laoghaire-Rathdown	218,018	27,266	12.5	2,427	205	8.4	0.09	78,601	0.26
Fingal	296,020	31,970	10.8	5,461	141	2.6	0.05	96,812	0.15
Galway City	78,668	10,133	12.9	1,233	176	14.3	0.22	28,859	0.61
Galway County	179,390	22,523	12.6	1,556	346	22.2	0.19	63,040	0.55
Kerry	147,707	19,965	13.5	2,180	399	18.3	0.27	54,493	0.73
Kildare	222,504	27,768	12.5	3,104	299	9.6	0.13	73,596	0.41
Kilkenny	99,232	13,332	13.4	834	85	10.2	0.09	34,855	0.24
Laois	84,697	11,393	13.5	665	44	6.6	0.05	29,107	0.15
Leitrim	32,044	4,486	14	190	34	17.9	0.11	12,452	0.27

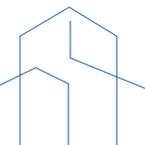


County and City	Total Population 2016	Total Number of Disabled People 2016	People with Disabilities as % of Total Population 2016	Total Housing Need 2020 (Households)	Housing Need Disability 2020 (Households)	Housing Need Disability as % of Total Housing Need 2020	Housing Need Disability as % of Total Population	Total Households 2016	Housing Need Disability as % of Total Households
Limerick City and County	194,899	29,228	15	2,081	268	12.9	0.14	71,224	0.38
Longford	40,873	5,916	14.5	502	15	3	0.04	15,122	0.10
Louth	128,884	17,881	13.9	1,324	231	17.4	0.18	45,448	0.51
Mayo	130,507	17,977	13.8	990	120	12.1	0.09	48,899	0.25
Meath	195,044	22,608	11.6	1,703	203	11.9	0.1	64,234	0.32
Monaghan	61,386	7,214	11.8	413	27	6.5	0.04	21,689	0.12
Offaly	77,961	11,154	14.3	487	52	10.7	0.07	27,343	0.19
Roscommon	64,544	9,313	14.4	291	53	18.2	0.08	24,013	0.22
Sligo	65,535	9,577	14.6	522	122	23.4	0.19	24,831	0.49
South Dublin	278,767	36,426	13.1	4,764	380	8	0.14	92,523	0.41
Tipperary	159,553	23,593	14.8	1,259	122	9.7	0.08	59,276	0.21
Waterford City and County	116,176	16,675	14.4	1,267	100	7.9	0.09	43,549	0.23
Westmeath	88,770	11,887	13.4	998	72	7.2	0.08	31,813	0.23
Wexford	149,722	22,650	15.1	1,798	343	19.1	0.23	54,289	0.63
Wicklow	142,425	19,244	13.5	2,192	147	6.7	0.1	49,211	0.30

Sources: CSO Census 2016. The Housing Agency, Summary of Social Housing Assessments 2020.

Appendix 2. Number of Households with Specific Accommodation Requirements on basis of Disability and Comparison Data Census 2016. SSHA 2020.

County and City	Total Population 2016	Specific Accommodation Requirements Disability 2020 Households No.	Specific Accommodation Requirements Disability 2020 as % of Total Population
State	4,761,865	4,000	0.08
Carlow	56,932	71	0.12
Cavan	76,176	38	0.05
Clare	118,817	104	0.09
Cork City	125,657	222	0.18
Cork County	417,211	123	0.03
Donegal	159,192	34	0.02
Dublin City	554,554	300	0.05
Dún Laoghaire-Rathdown	218,018	14	0.01
Fingal	296,020	64	0.02
Galway City	78,668	135	0.17
Galway County	179,390	203	0.11
Kerry	147,707	415	0.28
Kildare	222,504	258	0.12
Kilkenny	99,232	66	0.07
Laois	84,697	15	0.02
Leitrim	32,044	41	0.13



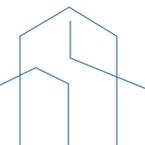
County and City	Total Population 2016	Specific Accommodation Requirements Disability 2020 Households No.	Specific Accommodation Requirements Disability 2020 as % of Total Population
Limerick City and County	194,899	217	0.11
Longford	40,873	16	0.04
Louth	128,884	152	0.12
Mayo	130,507	78	0.06
Meath	195,044	245	0.13
Monaghan	61,386	37	0.06
Offaly	77,961	41	0.05
Roscommon	64,544	17	0.03
Sligo	65,535	133	0.20
South Dublin	278,767	394	0.14
Tipperary	159,553	92	0.06
Waterford City and County	116,176	82	0.07
Westmeath	88,770	63	0.07
Wexford	149,722	213	0.14
Wicklow	142,425	117	0.08

Sources: CSO Census 2016. The Housing Agency, Summary of Social Housing Assessments 2020.

Appendix 3.

Housing Adaptation Grants for Persons with Disabilities by Local Authority 2020

Local Authority Area	Number of payments 2020	Value of payments/ € 2020	Population 2016	Payments per Head of Population €	As % of State Average
Carlow	67	549,242	56,932	9.65	172
Cavan	32	382,106	76,176	5.02	90
Clare	115	1,374,558	118,817	11.57	207
Cork City	58	476,771	125,657	3.79	68
Cork County	150	1,679,436	417,211	4.03	72
Donegal	79	557,385	159,192	3.50	63
Dublin City	647	4,909,972	554,554	8.85	158
Dún Laoghaire-Rathdown	101	675,356	218,018	3.10	55
Fingal	129	1,105,199	296,020	3.73	67
Galway City	52	308,650	78,668	3.92	70
Galway County	67	637,571	179,390	3.55	63
Kerry	102	785,549	147,707	5.32	95
Kildare	204	1,231,354	222,504	5.53	99
Kilkenny	87	736,843	99,232	7.43	133
Laois	35	321,520	84,697	3.80	68
Leitrim	11	94,900	32,044	2.96	53
Limerick City and County	109	733,075	194,899	3.76	67



Local Authority Area	Number of payments 2020	Value of payments/ € 2020	Population 2016	Payments per Head of Population €	As % of State Average
Longford	27	172,966	40,873	4.23	76
Louth	61	688,258	128,884	5.34	95
Mayo	59	467,816	130,507	3.58	64
Meath	136	912,259	195,044	4.68	84
Monaghan	61	699,222	61,386	11.39	203
Offaly	56	719,287	77,961	9.23	165
Roscommon	59	393,803	64,544	6.10	109
Sligo	89	801,799	65,535	12.23	219
South Dublin	191	1,771,984	278,767	6.36	114
Tipperary	180	1,721,174	159,553	10.79	193
Waterford City and County	41	329,286	116,176	2.83	51
Westmeath	67	439,160	88,770	4.95	88
Wexford	50	405,662	149,722	2.71	48
Wicklow	43	571,709	142,425	4.01	72
Totals	3,165	26,653,873	4,761,865	5.60	100

Source; Housing adaptation grant for people with a disability by area 2008 to date. DHLGH 2021

Note: The *Value of Payments* in Column 3 refers to the 80% of the grant contributed by the Department. A further 20% is contributed by the relevant local authority.



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