

## National Housing Strategy for People with a Disability *Submission to Housing Agency*

### Introduction

The Citizens Information Board (CIB) is the national agency responsible for supporting the provision of information, advice and advocacy on social services, including, through the National Advocacy Service for People with Disabilities (NAS)) advocacy support for people with disabilities.

CIB very much welcomes the review of the National Housing Strategy for People with a Disability and the work in preparing a successor strategy, currently being undertaken by the Housing Agency. CIB, (in collaboration with the Disability Federation of Ireland) is preparing a Social Policy Report, *Meeting the Accommodation Needs of People with Disabilities*. It is envisaged that this would inform the new strategy. This research is an update on *The Right Living Space*<sup>1</sup>, which included a number of recommendations to inform the first National Housing Strategy for People with a Disability.

CIB services – Citizens Information Services (CISs), Money Advice and Budgeting Service (MABS) and the National Advocacy Service (NAS) regularly highlight housing difficulties experienced by citizens. Citizens Information Services (CISs) dealt with 62,000 housing related queries in 2020 and over 90,000 in 2019, the fall in 2020 due to the closure of face-to-face services during the pandemic. The main issues raised by CIS users relate to the Housing Assistance Payment (HAP) and access to social housing generally. These issues affect people with disabilities similarly seeking appropriate accommodation or looking for assistance with getting house adaptations to help them manage in their own homes following an acquired disability. Families requiring house adaptations because they have a child with a disability is also a recurring theme.

Since the onset of Covid-19, housing issues have come into sharp focus in the work of CIB delivery services and reflect central concerns around the availability and affordability of suitable housing options for low-income households generally. Housing difficulties experienced by people with disabilities are identified by NAS on an ongoing basis. For example, in 2019, following the trend from previous years, housing and accommodation

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<sup>1</sup> [The Right Living Space](#), *Housing and Accommodation Needs of People with Disabilities* (2007).

accounted for 50% of NAS representative advocacy cases.<sup>2</sup> The cases included those experiencing homelessness or those at risk of homelessness, people with intellectual disabilities or autism who face particular challenges in the homelessness system, those in inappropriate residential placements<sup>3</sup> or in acute hospitals because of a lack of appropriate housing upon discharge and people in the process of moving out from large residential centres to live in the community. Difficulties faced by people with disabilities navigating the social housing list, waiting list issues, and rent arrears also featured regularly in NAS casework.

CIB notes that 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. However, the current policy emphasis on accommodating people with disabilities to live independently in the community is not working as envisaged in the 2011 Strategy. Some of the work of NAS involves helping people to assert their right to independent living and to find appropriate accommodation accordingly.

#### Some of the issues identified to date

An initial exploration of relevant research and policy submissions to Government and consultations with disability advocates, carried out for the CIB/DFI Social Policy Report has identified a number of areas where there are ongoing issues relating to integrated housing provision for people with a disability and/or those experiencing mental health difficulties.

- There is a significant shortage of accessible accommodation for wheelchair users in all housing tenure sectors – standard housing is not for the most part built to wheelchair accessible standards.
- Some people with disabilities are waiting for up to ten years for social housing across Ireland.<sup>4</sup>
- People with a physical, mental health, intellectual, sensory and other disability represent over 8% of the social housing waiting list.<sup>5</sup>
- 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

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<sup>2</sup> NAS dealt with 1,026 full representative advocacy cases in 2019 and 1,047 in 2020.

<sup>3</sup>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.

<sup>4</sup> Irish Wheelchair Association, Pre-budget Submission <https://www.iwa.ie/get-involved/advocacy-campaigns/our-campaigns/prebudget-2020/>

<sup>5</sup> <https://www.gov.ie/en/publication/970ea-summary-of-social-housing-assessments-2020-key-findings>

own homes in the community or in another more appropriate accommodation option—the recent Ombudsman’s Report estimated that the number of people in such circumstances was more than 1,300.<sup>6</sup>

- The specific accommodation needs of people who have had an acquired brain injury, a work accident or a life-altering experience are not well acknowledged or catered for under current provisions.
- 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.<sup>7</sup>
- Research carried out by the Irish Human Rights and Equality Commission and the ESRI, *Discrimination and Inequality in Housing in Ireland*<sup>8</sup> found that the generally disadvantaged position of people with disabilities in relation to housing varies across housing tenure. While among homeowners the likelihood of being discriminated against is only slightly higher than for people without disability, it is considerably higher among Local Authority renters, and even more so among private renters.
- The issue of affordability in the private rental sector<sup>9</sup> is a long-standing and ongoing problem for many users of CIB services – people with disabilities and/or mental health difficulties are being “priced out” of the private rental housing sector or are being discriminated against in that sector.
- 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 issue of homelessness for those with disabilities and mental health difficulties needs particular attention – research has shown that people with an intellectual disability are 1.4% of the total population and 3.1% of the homeless population.<sup>10</sup>

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<sup>6</sup> Office of the Ombudsman (2021) Wasted Lives: Time for a Better Future for Younger People in Nursing Homes <https://www.ombudsman.ie/publications/reports/wasted-lives/>

<sup>7</sup> Irish Human Rights and Equality Commission, <https://www.ihrec.ie/app/uploads/2018/06/Discrimination-and-Inequality-in-Housing-in-Ireland..pdf>

<sup>8</sup> Irish Human Rights and Equality Commission, *Ibid.*

<sup>9</sup> CIB and Threshold have jointly commissioned research on affordability issues impacting on private sector tenants who are users of our respective services.

<sup>10</sup> Inclusion Ireland, <https://inclusionireland.ie/wp-content/uploads/2020/11/housing-position-report.pdf>

### Housing Adaptation Grant for Older People and People with a Disability

There are regular calls from various organisations<sup>11</sup> for increased resources for the Housing Adaptation Grant for Older People and People with a Disability – people applying for a grant cite difficulties or delays in accessing occupational therapists to confirm the need for the grant, as part of the application process, which further compounds the fact that there are inadequate resources for the Scheme. The means test for the grant is perceived as posing a significant barrier for many as it is based on the total household income and not the income of the person with a disability. The application process is reported as onerous for many.<sup>12</sup>

### Gaps in supports

For disabled people who do not have medical or social care support needs, the ongoing practice of assigning home help hours instead of providing a Personal Assistance (PA) service undermines the concept of independent living.

The policy emphasis in recent years on a Personalised Budgets approach to enable people to live independent lives<sup>13</sup> 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, there is no timeline given for mainstreaming the Personalised Budgets approach.

### Access to information

It would appear that 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. Assistance is required in many instances in completing the application form for social housing.

### Integration at local level

There is a broad consensus among those consulted to date that there is a need for a much more effective collaboration, liaison and sharing approach involving both HSE and local authorities.

Difficulties experienced by people with disabilities in accessing suitable housing in the community are viewed as arising, at least in part, to a lack of integration relating to

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<sup>11</sup> These include CIB, DFI, NAS, Irish Wheelchair Association, Inclusion Ireland, and ALONE.

<sup>12</sup> CIBs dealt with over 8,000 specific queries on Housing Grants and Schemes in 2020 representing 14% of overall housing queries.

<sup>13</sup> Personalised Budgets Consultation, A CIB Submission to the Department of Health  
[https://www.citizensinformationboard.ie/downloads/social\\_policy/submissions2017/Personalised\\_Budgets\\_CI\\_B\\_Subm\\_Oct2017.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/submissions2017/Personalised_Budgets_CI_B_Subm_Oct2017.pdf)

implementation and resources in the provision of accommodation and support at local level, with limited options for housing and few individualised support models.

The consultation carried out to date indicates that there have been concerns in the manner – relating to performance and attitude - in which local authorities discharge 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 having a ‘tokenistic’ approach. It is suggested that there are problems arising from shortage of staff, staff turnover and under-developed skill sets, and a risk-averse culture.

There is evidence reported 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 places.

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

A lack of comprehensive data on the housing needs of persons with disabilities at local level is perceived as impacting negatively on future planning for housing and other essential supports. A key issue to be noted is that the NASS Bulletin<sup>14</sup> (which presents an overview of the information recorded on the Health Research Board’s National Ability Supports System database of service users that were previously registered on the National Intellectual Disability Database (NIDD) and the National Physical and Sensory 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 in enabling people to live in the community.

## Conclusion

The challenge in developing a new Strategy is to create a more effective linkage between aspirational policies at national level and the realities and practice at local level. There is a strong need for policies and practices that will require and enforce effective collaboration

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<sup>14</sup> There is anecdotal evidence that some people are not putting themselves on the database because they believe that the required support is simply not available.

between the various agencies charged with meeting the accommodation and support needs of people with disabilities.

Much has changed since *The Right Living Space* was published and since the current 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 being accommodated in mainstream community settings and insufficient innovation and inter-agency collaboration to progress strategic intent in this important area.

The new Strategy should, in the view of CIB, have a strong focus on developing innovative and creative models of delivery. This needs to be based on the premise that there is no 'one-size-fits-all' model of delivery. People with disabilities are evidently a widely diverse population frequently requiring individually-tailored housing responses. Article 19 (a) of the UNCRPD presents a major challenge in developing an inclusive housing strategy for people with a disability -- *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 significant challenge in developing the new Strategy.