

Reviewing Disabled Housing Policies in Ireland: Are These Policies Fit for Purpose?

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Introduction

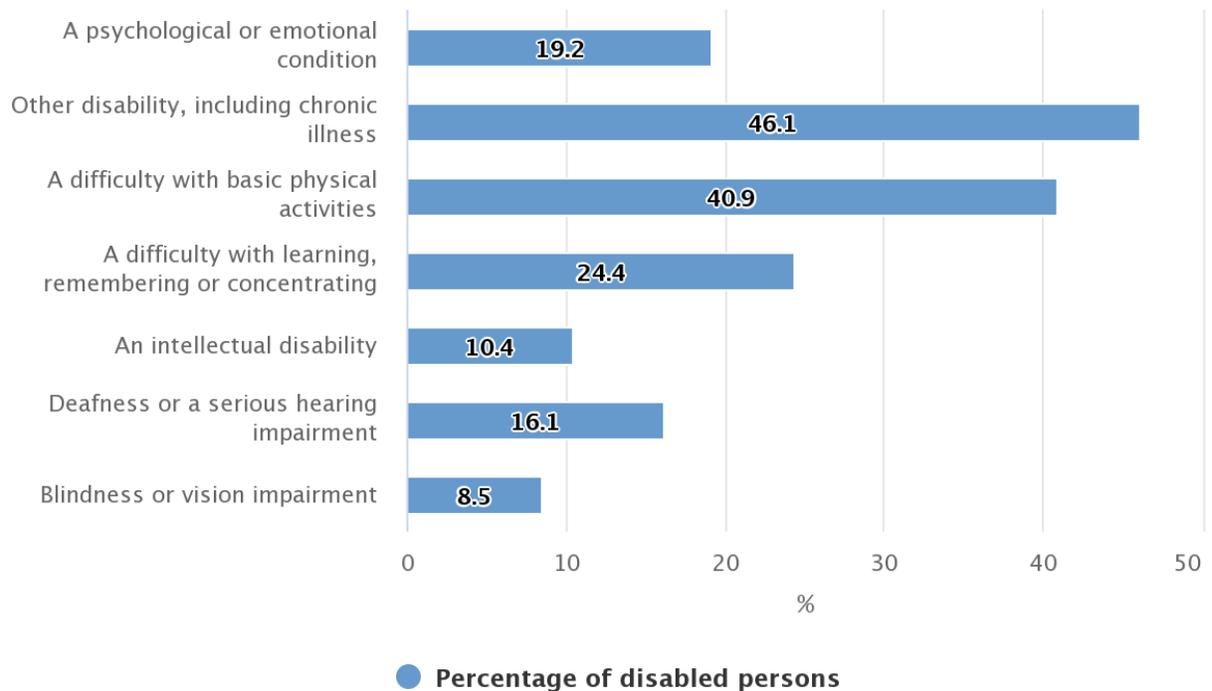
The National Housing Strategy for Disabled People 2022-2027 (NHSFDP, 2022) was launched in January 2022 with the aim of building on the work achieved through the National Housing Strategy for Disabled People 2011-2016 (which was been extended to 2021). The aim of the strategy was to establish a framework for the provision of disabled friendly housing in Ireland. It was intended to play part of the government’s plans to increase the number of accessible and affordable housing alongside the Housing for All plan (HFA) and the United Nations Convention on the Rights of People with Disabilities (UNCRPD, 2008), which Ireland has signed and thus has obligations under the convention. The NHSFDP (2022: pp.19-20) allowed for the UNCRPD to be included in the policy since it was only ratified in Ireland in 2018. This paper analyses the current disabled housing policies in Ireland in light of the NHSFDP. It aims to examine whether the current policies are fit for purpose, to see if these policies meet the level of demand for disabled housing, and to investigate what role the NHSFDP will have. The need for increasing disabled accessible housing is due to disabled people not having access to the same opportunities able-bodied people have due to not being able to access suitable housing. This paper looks at the effectiveness of the strategy to ensure that sufficient disabled housing is delivered and analyses the initiatives that the NHSFDP uses for providing increased disabled housing.

For the purpose of this article, the terms ‘disabled person/people’ and ‘person/people with a disability’; and ‘disabled (friendly) housing/accommodation’ and ‘accessible accommodation’ will be used interchangeably. Even though there are multiple disability types, this article will refer to ‘wheelchair visitable’ and ‘wheelchair liveable’ housing in the context of housing that is accessible to people with mobility challenges.

Disability Statistics

The NHSFDP provides limited data on disabled housing but most of the data stems from the National Disability Authority’s (NDA) disability factsheets. According to the 2016 census (CSO, 2017a), there are 643,131 people in Ireland with disabilities, which accounts for approximately 13.5% of the general population (CSO, 2017a). This is an increase of 0.5% from the 2011 Census.

There is also a breakdown included by the CSO (2017b) of the percentages of disabled people by the type of disability they have (see Figure 1 below).



Source: CSO Ireland

Figure 1: Percentage disabled persons by type of disability, 2016. The blue bars indicate the percentage of disabled persons in Ireland. Source: CSO, 2017b. Data available at <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9tod/>

In 2016, there were 92.9% of disabled people living in private households. While the variation in disabled people living in owner-occupied properties (68.8%) is small compared to the general population (69%), only 12.4% of disabled people rented from private landlords in comparison to 17.8% of the general population (National Disability Authority, 2020: p.17; see Figure 2 below). This, along with the fact that 13.4% of disabled people were renting from Local Authorities in comparison to 8.4% of the general population (National Disability Authority, 2020: p.17), suggests that disabled people are more reliant on social housing than the general population.

	Owner occupied with loan or mortgage	Owner occupied without loan or mortgage	Rented from private landlord	Rented from a Local Authority	Rented from a Voluntary Body	Occupied free of rent
Blindness or a serious vision impairment	18.6%	47.9%	11.8%	15.6%	1.8%	1.8%
Deafness or a serious hearing impairment	17.9%	61.5%	6.3%	9.6%	1.1%	1.8%
Substantially limits one or more basic physical activity	17.5%	54.3%	8.2%	14.3%	1.6%	1.8%
An intellectual disability	28.0%	31.8%	12.6%	18.7%	3.1%	2.3%
Difficulty in learning, remembering or concentrating	27.6%	36.3%	13.2%	16.4%	2.1%	1.9%
Psychological or emotional condition	27.9%	28.2%	18.9%	17.9%	2.5%	1.8%
Other disability, including chronic illness	24.6%	44.6%	11.9%	13.9%	1.5%	1.6%
Difficulty in dressing, bathing or getting around inside the home	19.6%	50.6%	9.1%	14.5%	1.7%	2.0%
Difficulty in going outside home alone	18.4%	51.4%	9.3%	14.6%	1.9%	2.0%
Difficulty in working or attending school/college	25.5%	41.8%	12.2%	14.6%	1.9%	1.8%
Difficulty in participating in other activities	22.9%	47.8%	9.9%	13.7%	1.7%	1.8%
Total persons with a disability	24.7%	44.1%	12.4%	13.4%	1.6%	1.7%
General Population	38.6%	30.4%	17.8%	8.4%	0.8%	1.2%

Source: Census Data

Figure 2: General Population and Persons with Disabilities by Occupancy Type and Disability Type. Table formulated by the National Disability Authority (2020: p.17) based on data from the 2016 census. Table available at <https://nda.ie/resources/factsheets/nda-factsheet-5-housing/nda-factsheet-5-housing-briefing-information.pdf>

In terms of data on wheelchair accessible accommodation in Ireland, there is very little data available from both the NHSFDP and the NDA, but the NHSFDP does include data from the National Ability Support Service (NASS) (NHSFDP, 2022: p.32). The data however primarily relates to the types of living accommodation and arrangements (see NHSFDP, 2022: p.33). The data showed that 9,371 (26%) of its service users were living in private, owner-occupied accommodation while 2,723 (7%) were living in rented accommodation (National Disability Authority, 2020). 23,058 (63%) of those registered with NASS were living with family members, while only 1,704 (5%) were living alone. This, along with the fact that 22% of service users either

live with non-family or in residential care, indicates further that disabled people currently do not have access to suitable accommodation. In terms of social housing, the Irish Wheelchair Association (IWA) reported that there are over 5,000 people with disabilities waiting for social housing (The Housing Agency, 2022; Breaking News, 2021).

There is no available data on what wheelchair visitable or wheelchair liveable housing options currently exist or are in use, except for where the NHSFDP (2022: p.60) states that 10% of new social housing developments of 10 dwellings or more are to be disabled housing and that 50% of new pipeline delivery social housing for people with disabilities should be wheelchair liveable. This data however does not tell us what percentage of housing in Ireland meets any of the above-mentioned criteria. This could likely be because, according to the NHSFDP, it was not known whether 46% of housing used by people registered with the NASS was accessible.

Policy on the Housing of Disabled People

National Housing Strategy for Disabled People

The NHSFDP was written after the HFA and the National Housing Strategy for Disabled People 2011-2016 (extended to 2021). It was intended to supplement the HFA plans to support people with disabilities to secure accessible and affordable housing. It was written with the idea of ensuring that there is increased access to accessible housing in Ireland and that people with disabilities are able to access suitable housing with greater ease and through the existing mainstream housing policies. The strategy is aware that there will be certain aspects that will need to be addressed as they arise and includes the first phase of working to strengthen the information that it has, before the implementation plan is published in detail. The aim of the strategy is to help people with disabilities to live independently and be able to be included in their communities in the same way as able-bodied people.

There is no one single body responsible for the provision of disabled housing in Ireland as the responsibility is spread across different departments, agencies, and authorities (Government of Ireland, 2020). Local authorities have statutory responsibility for the provision of disabled housing and its related services. The Department of Housing, Local Government and Heritage is responsible for the provision of national policy, legislation and funding relating to housing. The Department of Health is responsible for the funding to ensure that disabled people can live appropriately in the housing. The Health Service Executive (HSE) handles the provision of healthcare and social supports for disabled people, alongside a service budget. The Housing Agency is responsible for overseeing the implementation process for disabled housing. The Department of Children, Equality, Disability, Integration and Youth is tasked with coordinating wider disability policies that inform housing policies. All of this has proven to be challenging as there is no one body that is responsible for overseeing disabled housing, leading to potential issues with the sharing of information across departments and agencies. This was seen in a report from Independent Living Movement Ireland and Inclusion Ireland (2021: p.13) where they referred to

service users criticising the lack of a clear pathway to securing disabled social housing and how there is very little engagement between local authorities and the HSE. This can negatively impact service users as they may require a support package to be able to live independently.

The NHSFDP (2022: pp.44-45) featured a consultation phase that included: questionnaires with the general public; Local Strategic Plans submitted by local authorities' Housing and Disability Steering Groups; and submissions from a number of key stakeholders. The feedback from the consultation was then put together and the findings were used to help define which aspects needed amending.

Current Disabled Housing Supports

There are currently a small number of grants available for adapting homes to be more disabled friendly. The main one is the Housing Adaptation Grant for People with a Disability, which is designed to assist disabled people to carry out adaptations to their home to make it more suitable (Government of Ireland, 2021). These could include adapting a bathroom to be accessible or placing ramps into a house. The maximum grant available is €30,000, with the applicant required to provide a minimum of 5% of the total approved cost. The grant is means-tested based on household incomes and depreciates as incomes rise, with a cut-off point of €60,000 total household income. Homes built within twelve months are only eligible for 48.33% of the total grant. While there is a commitment in the HFA and NHSFDP to increase the Housing Adaptation Grant, there is no indication as to what degree the grant will be increased by.

The Mobility Aids Grant is similar but is designed to cover minor adaptations such as hoists and level access showers. The maximum grant is €6,000 and applicants are not expected to cover any of the cost. It is means-tested however, with a total household income cut-off of €30,000. While there are some social welfare payments that are not considered income for the means-test for both grants, disability allowance is not listed as disregarded income. This is worrying as disabled people living in households with incomes that are over the cut-off point may be forced to live in unsuitable housing. If there was a greater indication of what the new income limits would be, disabled people would have a better opportunity to adapt their life so they could be more independent. Independent Living Movement Ireland and Inclusion Ireland (2021: p.140) have underlined how the means-test is “harsh”, that the grant often does not cover the cost needed to adapt a home, and that it is problematic that the home adaptation grant is not available for new build homes. This amplifies the need for the government to provide further clarity on the timeframe for increases to the grants.

Definition of Disabled Housing

When it comes to defining what exactly disabled friendly housing is, the NHSFDP does not offer a lot of definition as to what disabled housing should look like. It does however offer some detail about what would constitute a disability eligible for disabled friendly housing. The strategy uses the categories of sensory disabilities, mental health disabilities, physical disabilities, intellectual

disabilities, and psychosocial disabilities as a way of determining what disabilities are to be considered (NHSFDP, 2022: P. 8). It appears not to refer to what degree the disability should affect a person's ability to live independently. However, in the criteria for disability allowance eligibility it states that the person must have, or reasonably expect to have, a continuing congenital deformity, defect, disease, injury, mental illness or physical illness for at least one year (Citizens Information, 2022b). Due to the lack of clarification of how long a disability should last for to qualify for disabled housing, the disability allowance definition could constitute a good interpretation. The NHSFDP (2022: p.36) does state that the applicant must reach the income eligibility for social housing and demonstrate that they cannot find suitable accommodation elsewhere. Interestingly, the applicant only needs to provide proof of their disability during the assessment stage.

Local authorities are tasked with determining the housing needs under the categories of 'basis of need' and 'specific accommodation requirements'. It is now possible for applicants to identify their housing needs as 'wheelchair liveable'. Yet, despite 'wheelchair liveable' being an option on the form (see e.g. Roscommon County Council, n.d.), the current legislation only includes a requirement to have 'wheelchair visitable' housing. Therefore, under the legislation that currently exists, it is unclear as to whether the housing is wheelchair liveable or is wheelchair visitable. Interestingly, the application forms do seek supporting documents including a medical and/or a disability information form and a report from an occupational therapist if the person is applying for disabled accommodation (Roscommon County Council, n.d). This could mean that effectively you need to provide the evidence of disability when applying or that the local authorities are just pre-empting the next stage in an attempt to speed up the process.

The term disability is very broad and stretches across multiple areas such as physical, sensory, mental and intellectual. Intellectual disabilities tend to include people with autism. The NASS (NHSFDP, 2022: p.32) includes data and information about HSE-funded services that are available to people with disabilities such as intellectual, developmental delay, neurological, sensory, physical, learning, speech, language, autism and mental health. This list is much more comprehensive than the list for applying for disabled housing but appears to incorporate all the other categories.

The current regulations regarding accessible housing in Ireland are set out in the Building Regulations (Part M Amendment) 2010. The legislation states that all dwellings only need to be visitable to the *greatest extent possible* for people with mobility issues. The regulations even stipulate that dwellings can sometimes be deemed visitable even if they lack the ability to be fully accessible (e.g. just having a room on the main storey if the main living room is not accessible, as seen in Section 0.4 of the Access and Use section of the regulations (S.I. No. 513/2010)). While there is a requirement for a bathroom to be included on the entry floor or the main storey floor (if the entry floor has no habitable room on the entry floor), there are no requirements that the bathroom have disabled accessible features. This is problematic as making dwellings visitable for people with mobility issues can have major implications for the cost of the building, potentially

resulting in some forms of housing not being able to be built. Even with this, the regulations do not deliver housing that is liveable for people with mobility issues (e.g., wheelchair users). The NHSFDP (2022: p.60) does state that 10% of new social housing developments of 10 or more are to be suitable for disabled people, with 50% of those builds to be wheelchair liveable, yet this is likely to be insufficient. A dropping of the visitable requirement in exchange for requiring that a certain percentage of builds conform to the UD Homes+ guidelines relating to what constitutes wheelchair liveable housing could allow for an increase in the total accessible housing options. For the most part, the regulations primarily relate to non-dwellings, which include a requirement for buildings to be accessible and useable. However, it does not state in the regulations what constitutes “buildings other than dwellings” (S.I. No. 513/2010).

The existing approach of wheelchair visitable housing options in Ireland does not mix well with universal design (which will be looked at in a following section) or the approach taken by Krishblum and Lin (2018) who state that there are three basic requirements for wheelchair users. These requirements are for 1) there to be no entry step, 2) the doorways and passageways to be of a sufficient width and, 3) the inclusion of an accessible bathroom (2018: p.850). Ireland’s Building Regulations (Part M Amendment) 2010 appear to go against this idea as they do not specifically refer to the need to have an accessible bathroom. If the NHSFDP is going to encourage universal design principles, the Building Regulations will need to be altered to include more robust regulations on accessible housing.

The NHSFDP does not refer to what wheelchair liveable housing should look like specifically, but it does state that it must meet the home recommendations of the Centre for Excellence in Universal Design. This point however has been challenged by Joan Coleman from the Irish Wheelchair Association (IWA), who said that further scrutiny is needed into what exactly should be contained in the universal design of wheelchair liveable homes, and who called the current guidelines as insufficient (Neylon, 2022). Harrison and Davis (2001) offer a definition of ‘wheelchair standard’ housing but they only state that extra space needs to be incorporated and they provide examples of design standards that permanent wheelchair users might require. They differentiate ‘wheelchair standard’ from ‘mobility standard’, the latter of which they state is housing stemming from ordinary standards that have moved towards greater adaptability and convenience for the user.

International Comparisons

Even though it was acknowledged in the NHSFDP that “none of the countries researched have a specific Housing Strategy for disabled people” (The Housing Agency, 2021: p.48), the designers the NHSFDP looked at initiatives operating in Australia, Canada, England, New Zealand, and Sweden to inform the strategy. One notable feature of the countries examined is that Canada was the last country to ratify the UNCRPD in March 2010. The fact that these countries have all released housing strategies after this and initiatives to provide for disabled housing suggests that these strategies have likely incorporated universal design principles into their housing policies

already. Most of the countries examined have house modification grants and supports for people with disabilities to live in their own homes and to live more independently. The Swedish Service Housing Model was considered an area of interest for the NHSFDP as it allows for residents of apartments to have shared access to apartments with permanent staff on hand to assist. The National Disability Insurance Scheme in Australia was also considered highly as it looks at disability from a long-term perspective through early interventions and an individualised approach to service users.

Universal Design

Harrison and Davis (2001) state that addressing the specific housing needs of people with disabilities could be seen through the prism of remedying individual user's problems, rather than adapting locations to be suitable for all people. This contrasts with the universal design approach adopted and integrated into the NHSFDP (2022). Universal design can be understood as “the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability” (the Centre for Excellence in Universal Design, 2015). In the UN Convention on the Rights of Persons with Disabilities (2008) it states that:

“Universal design” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. “Universal design” shall not exclude assistive devices for particular groups of persons with disabilities where this is needed” (UNCRPD, 2008, Art. 2)

The NDA created guidelines on what universal design should feature in Ireland. These guidelines were designed to stretch across various forms of disabilities including people with physical disabilities, dementia and mental health difficulties, etc. The guidelines included details about specific types of rooms and what specifications were needed for rooms with various bedroom numbers plus occupants.

The universal design guidelines referred to in the NHSFDP consist of the UD Homes+ concept which includes the principles of what wheelchair liveable housing should consist of¹. Yet, the Centre for Excellence in Universal Design (n.d) state that, “residential developments incorporating Universal Design Homes should include homes designed to both the UD Home and UD Home+ (wheelchair liveable) levels”. As there is a desire for housing to use universal design principles, the distinction between the two guidelines seems unnecessary and a merger of the two guidelines could be more effective.

Despite the desired push towards incorporating universal design principles in housing, it is important to reiterate the IWA's concerns that further scrutiny is needed into what exactly should be contained in the universal design of wheelchair liveable homes. It is also important to note that

the IWA have produced access guidelines on the various accessibility measures that should be established in Ireland, including provisions on disabled housing (Irish Wheelchair Association, 2020). The IWA's guidelines appear to be the most comprehensive guide available on what wheelchair housing should look like in Ireland. It provides details on what criteria and dimensions specifically apply for wheelchair users and also provides details on "Lifetime Adaptable Housing" that is designed to be capable of being altered to cater for the various access requirement needs (Irish Wheelchair Association, 2020: pp.296-302). These would be tailored more for people with disabilities who are not full-time wheelchair users. This approach allows for adaptations to be made in the specific housing but also allows for further adaptations to be made in the future. While these policies are written with the universal design concepts in mind, it is also acknowledged that the best design for the service user will often have to be worked out after the house has been allocated.

Conclusion

The NHSFDP (2022) was written with the intention of providing a framework for how affordable and accessible disabled housing should be achieved. The strategy allows for an initial one-year period to see how it should be implemented in practical terms and, at the time of writing, we are still within that first-year timeframe, so it is not yet fully clear what will come of the strategy (NHSFDP, 2022: p.8). While the policy does provide some level of initiatives that are to allow for increased disabled housing, it is still lacking in a strong definition of what disabled housing standards are in Ireland. This is problematic as disabled people are left not knowing what exact costs they are going to face and uncertainty as to where they can engage in social activities or seek employment. There is no argument that independence is vital for disabled people but if they are unsure where to access disabled housing, this dampens their ability to access the independence that they could have.

A single definition or much more solidified definitions of what 'wheelchair liveable' housing is, in addition to the UD Homes+ guidelines (Centre for Excellence in Universal Design, n.d.), could allow for those operating in the private housing sector to better advertise their homes as being suitable for people with disabilities. The Part M Building Regulations need to be updated to conform more with universal design principles to allow for housing to be more accessible for disabled people. To do this, the visitable requirement for housing should be dropped in exchange for a requirement for housing to conform with the UD Homes+ guidelines. As it currently stands, a 'wheelchair standard' approach does not appear to exist in Irish policy.

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ⁱ Interestingly, Fingal County Council mentioned online that the universal design approaches should be adopted in March 2019, providing an early sign (prior to the launch of the NHSFDP) that universal design approaches were going to be implemented (Fingal County Council, 2019).