



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Report to Housing SPC

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Dublin City Council

Dublin City Council's Housing Strategy for Disabled People

2022-2027

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OPENING STATEMENT

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) seeks to promote and protect disabled people's right to live independently and be included in the community, with choices equal to others. Dublin City Council recognises the need for equality of access for everybody to all aspects of the built and external environment, including housing, as an essential prerequisite of equal opportunities and the development of an inclusive society.

The Council has the lowest proportion of people with a disability as a basis of housing need on our housing waiting list (0.3%¹). Notwithstanding this low base, the Council achieved significant success in providing for the housing needs of disabled people, with allocations of housing to those with a disability averaging at 13% housing allocations and 12% of social housing transfers during the period of the last strategy.

In addition to housing provision, the Council supports people to remain in their homes, where they may require adaptations to remain living comfortably. Over the period 2018-2021, we carried out 1,543 alterations, including stair lifts, ramps, level deck showers, to existing Council homes and 47 extensions, to accommodate ground floor bedrooms and/or bathrooms, with expenditure in excess of nine and a half million euros. For homeowners, we administered 7,117 applications for grants for alterations/adaptations, funded by the Department of Housing, Local Government and Heritage, which totalled almost twenty five million euros worth of grants paid (2018-2021).

This is Dublin City Council's second housing strategy that specifically focuses on housing for disabled people. The original strategy was informed by two landmark national policies, published in 2011: the National Housing Strategy for People with a Disability 2011-2016 and its associated implementation framework, and A Time to Move on from Congregated Settings – A Strategy for Community Inclusion.

This new Housing Strategy for Disabled People 2022-2027 is guided by the principles set out in the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and by the National Housing Strategy for Disabled People 2022-2027 as it applies to the housing needs of Dublin City residents.

The Council is committed to prioritising housing for disabled people where their current accommodation is not suitable to meet their needs and a change in housing will improve or stabilise their situation.

We will continue to make provision for the choices of people to live close to services they need, complementing the work of the Health Service Executive in the provision of health and personal social services to promote and protect disabled people's right to live independently.

I would like to thank the members of the Dublin City Council Housing Disability Steering Group, made up of representatives with experience and expertise in working with or supporting people with disabilities, as well as those with lived experience, whose expertise was relied upon in the formulation of both the original strategy and this revised strategy.

Assistant Chief Executive Colín O'Rielly (Insert signature)

¹(Average 2016-2020)

STEERING GROUP MEMBERS

Cheeverstown

Cheeverstown is a voluntary organisation that provides a wide range of residential, respite and day services to children and adults with an intellectual disability. The mission of Cheeverstown is to enable people with intellectual disabilities to have full and meaningful lives through person centered services in partnership with their circle of support.

HAIL

HAIL's mission is to provide housing and individually tailored services to support people, primarily those with mental health difficulties, to integrate and live independent lives in the community.

Health Service Executive (HSE)

The HSE is a public body responsible for all of the public health services in Ireland. Representatives from the HSE on this Steering Group include those from the Social Care Division and the Mental Health Division with regard to supporting people to live independently who may otherwise have difficulty in doing so due to illness or disability.

Independent Living Movement Ireland (ILMI)

The ILMI are working collectively to create an independent living Movement in Ireland which is led by disabled people and promotes a rights-based social model of disability, challenging the charity/medical model of disability. The ILMI are working towards the removal of societal barriers that prevent active equal participation of disabled people, challenging the denial of people's rights and the promotion of the philosophy of independent living.

Irish Council for Social Housing (ICSH)

ICSH is the national social housing federation representing over 270 housing associations across Ireland. The objectives of the ICSH are to: promoting the role of housing associations in meeting housing need and addressing homelessness on local, regional, national and EU fora; acting as the representative body for members with Government, statutory agencies and other stakeholders; promoting best practice amongst members in relation to planning, provision and management of social housing; and, providing a comprehensive information, advice, education and training service.

Irish Wheelchair Association (IWA)

The IWA works with, and on behalf of, people with physical disabilities to drive positive change in Ireland through the influencing of public policy, the provision of quality services and enabling accessibility to all aspects of society.

St. Margaret's Disability Services & Support Organisation

St. Margaret's IRL-IASD works with adults with disabilities, their families/significant people in their life, providing individualised, rights-based supports that enables each person to develop a meaningful life that they control, as they live at home in their community.

HDSG FUNCTIONALITY

The National Housing Strategy for People with a Disability 2011 – 2016 was published in October 2011. The strategy was developed with significant cross-Departmental and interagency support, a whole-of-government approach, which was followed with a similar approach to implementation, through the work of the high-level Implementation Monitoring Group and the Housing Subgroup against the National Implementation Framework.

A key output of the original National Housing Strategy for People with Disability 2011 – 2016 was the impetus for the establishment of a Housing and Disability Steering Group (HDSG) in all local authorities.

The second National Housing Strategy for Disabled People 2022 – 2027 was published in January 2022 by the Department of Housing, Local Government and Heritage (DHLGH) with the Department of Health (DoH) and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY). It seeks to strengthen the mandate of the HDSG and further develop inter-agency implementation partnership

The membership of the Steering Group must include:

- Senior Local Authority representative
- Senior HSE Representatives
- Representative from each of the four disability sectors operational in the local area
- Representatives from up to 3 approved housing bodies at manager level

The nominations to the HDSG from the disability sector represent their sector rather than just their organisation/local service.

The Steering Group are required to carry out the following actions:

- Engage with the local authority on its implementation of the National Guidelines for Housing Assessment and Allocation for People with Disabilities including those transitioning from institutional settings to identify any obstacles or barriers in the implementation of the Guidelines.
 - Assist all members of the group to gather and disseminate information.
 - Report annually on allocations made in the previous calendar year to people with a disability in each of the disability categories.
 - Develop strategic implementation processes with the local authority while also monitoring the implementation of the Local Authority Strategic Plan. This will include assessing the disability needs on the local authority waiting list and associated accommodation needs related to their disability.
 - Devise means of planning for and meeting emerging need.
 - Complete a register of adapted properties suitable for people with a disability owned by the Local Authority and Approved Housing Bodies, this should include details of the adaptations made and any specific design required.
 - Explore options for increasing the supply of housing for people with a disability being delivered by the private sector.
-

- Identify key barriers or challenges to people with a disability accessing housing and if possible, addressing these issues at local level. If it is not a local issue, then the issue should be escalated to the Housing Subgroup for discussion and actioning if appropriate.
- The Housing and Disability Steering Groups may be required from time to time to carry out actions as determined by the Housing Subgroup established under the Implementation Framework of the National Housing Strategy for People with a Disability.

The Housing for All strategy identifies a number of key actions to increase and improve housing options and supports for people with disabilities. Adding to the actions listed in the original terms of reference for the HDSG, it expects that the Housing Disability Steering Groups will report quarterly on the implementation of their local strategic plans regarding housing with a disability to the Chief Executive and the Strategic Policy Committee².

We are seeking to ensure that we have direct participation of Disabled People's Organisations (DPO's), in line with the UN Convention on the Rights of Persons with Disabilities (CRPD) Article 33 which makes clear that the domestic oversight and independent monitoring of the Convention's implementation must involve the participation of disabled people themselves³. At local level, we are seeking to replicate this aim by ensuring that the Housing and Disability Steering Group has the direct participation of disabled persons, as members of the Steering Group.

This will also serve to strengthen coordination between the Housing Sub-Group/National Implementation Monitoring Group (IMG), whose responsibility it is to report on progress on the national strategy, and Dublin City Council and other local authority local steering groups, as a number of our members and perspective DPO members are members of both groups.

THE LANGUAGE OF DISABILITY

It is a matter of preference for a person with a disability/disabled person in how they see themselves/described themselves. The original strategy adopted a 'person-first' language of disability which emphasises putting the person first and the disability second: for example, 'person with autism'. Others may feel that their disability is an integral part of their personal identity and as a difference, rather than a disability and use 'identity-first' language, for example, 'autistic person'.

The discourse has moved to descriptors that examine the 'lens' in which the disability is looked at, with a preference amongst disabled people to move away from the medical model of disability to adopting a social model of disability.

The medical model of disability says people are disabled by their impairments or differences. Under the medical model, these impairments or differences should be 'fixed' or changed by medical and other treatments, even when the impairment or difference does not cause pain or illness. The medical

² Housing for All 2. Pathway to Eradicating Homelessness, Increasing Social Housing Delivery Inclusion, p.68 Policy Objectives

³ Establishing a Monitoring Framework in Ireland for the UNCRPD, The Centre for Disability Law and Policy, NUI Galway

model looks at what is ‘wrong’ with the person and not what the person needs. It creates low expectations and leads to people losing independence, choice and control in their own lives.

The social model of disability says that disability is caused by the way society is organised. That is, where a person has an impairment, it is not their impairment that renders them disabled – rather it is the way that society interacts with and responds to that impairment that makes the person disabled. They are disabled by a world that is not equipped to allow them to participate fully and equally to others due to barriers in society. Physical, communication, or attitudinal barrier, such as prejudice, can hinder a person’s full and effective participation as an equal member of society and effectively disable the individual, which can affect their ability to live a life with dignity, respect and equality in a multitude of ways.

The Social Model is a proactive and solutions focused model – it identifies barriers that disable people face and seeks solutions as to how these barriers can be removed, minimised or countered by other forms of support.

This strategy adopts the language of the social model of disability. One of the main barriers to disabled people participating equally in social or cultural life is as a result of lack of access to adequate housing and supports. When a person has an enduring physical, sensory, mental health or intellectual impairment and does not have adequate or appropriate housing and supports to live independently, this can place a substantial restriction on their capacity to carry on a profession, business or occupation or to participate in social or cultural life.

This strategy examines the identified need for housing for disabled people and the processes and the system and structures in place in which the Council, in its remit as a housing provider, can sufficiently make provision for housing for disabled people.

In the context of this strategy, Dublin City Council must make provision for disabled people, and create opportunities so disabled people have equal access to housing, and that the voices of those directly affected are heard and integrated into decision making.

1. CONTEXT

Obligations to Promote and Protect Disabled People’s Rights

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) was ratified and entered into force in Ireland in 2018. This international convention is an international law which sets out what countries must do ensure persons with disabilities can exercise their rights the same way as everybody else. Article 19 of the UNCRPD specifically seeks to promote and protect disabled people’s right to live independently and be included in the community, with choices equal to others.

Article 19 – Living independently and being included in the community

States party to the present Convention recognise the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall 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, including 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 priority actions within this strategy aim to align with those of the UNCRPD, particularly Article 9, and commitments made in the National Housing Strategy for Disabled People (NHSDP). We aim to facilitate access for disabled people to appropriate housing, liaising with those responsible for the provision of related support services, and promoting equality of opportunity, individual choice and independent living.

Population Living with a Disability & Future Projections

Just under 650,000 people in Ireland are reported to be living with an impairment that compromises their health, accounting for 13% of the population, with Dublin City's figure at over 14%. Between 2011 and 2016, the numbers of people with different disabilities increased across all categories⁴.

By 2026, it is expected that the population with a disability will increase by roughly 20 per cent. 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 population⁵.

The rate of disability increases with age. The older population (i.e. those aged 65 years and over) is projected to increase very significantly from its 2016 level of just under six hundred and thirty thousand persons to nearly 1.6 million by 2051⁶.

HOUSING NEED FOR DISABLED PEOPLE

National Housing Need for Disabled People

Disabled people are only half as likely to be in employment as others of a similar working age. The unemployment rate for disabled people is 2.3 times the rate compared to non-disabled people. This means that for many disabled people, their income is not sufficient to find and maintain secure suitable accommodation that meets their needs.

It is estimated that 5,000 people with a registered disability are awaiting social housing in Ireland. The most recent Social Housing Needs Assessment⁷ notes that in 61,880 households were assessed as qualified for social housing support in 2020. Of those, 5,002 were considered to require housing with disability as the basis of need⁸.

⁴ Census 2016

⁵ National Disability Authority

⁶ Population and Labour Force Projections 2017-2051, Central Statistics Office

⁷ Summary of Social Housing Assessments 2020, The Housing Agency

⁸ Total Housing waiting list Dublin City Council was 14,678 and 16,705 in 2020 and 2019 respectively.

Dublin City Council Housing Waiting List - Disability

The Housing Agency's Dashboard⁹ to the Analysis of Households with a Disability Basis of Need for Social Housing 2016-2020¹⁰, indicated that the percentage of people on Dublin City Council's waiting list with Disability as a basis of need is 0.3%, averaged over the period 2016-2020. This is the lowest percentage figure across all County/City Councils, and significantly lower than the highest of 27%.

The Council's current housing waiting list indicates 1% of disabled people who are on the medical priority list, where a medical professional has certified that their current accommodation is not suitable to meet their needs and a change in housing will improve or stabilise their situation. When including those on the housing list who have disability recorded but is not certified as medical priority, the figure increases to 6% (805)¹¹.

Unrecorded Unmet Need

Groups representing disabled people will point out that the unmet need for housing for disabled people is significantly under-represented on the housing lists of local authorities. They state that many disabled people constitute the "hidden homeless". This includes those who:

- remain living in their parents' homes;
- remain living in other people's homes;
- remain living in congregate residential settings;

and/or

- are not on any housing list/are unaware of their right to be on the list/how to apply
- are not adequately considered in terms of an expectation that they can live independent lives.

They note that there remains thousands of disabled people in residential and congregated settings who are denied a right to their own home, citing a lack of delivery of policy in terms of housing and supports means that their needs are not being met¹². The Time to Move on from Congregate Settings¹³ report indicated that by the end of 2019, 1,953 people remained living in congregate settings¹⁴. According to the National Ability Support System (NASS) 2020¹⁵ report, which registers people in receipt of disability services, 2,147 (5.9%) of those included in the study were residing in a residential

⁹<https://public.tableau.com/app/profile/research.team3976/viz/DashboardSSHADisabilityNeed/DisabilityNeed>

¹⁰ [https://www.housingagency.ie/sites/default/files/2022-](https://www.housingagency.ie/sites/default/files/2022-01/Analysis%20of%20Households%20with%20a%20Disability%20Basis%20of%20Need%20for%20Social%20Housing.pdf)

[01/Analysis%20of%20Households%20with%20a%20Disability%20Basis%20of%20Need%20for%20Social%20Housing.pdf](https://www.housingagency.ie/sites/default/files/2022-01/Analysis%20of%20Households%20with%20a%20Disability%20Basis%20of%20Need%20for%20Social%20Housing.pdf)

¹¹ Dublin City Council Housing Waiting List, October YTD 2021.

¹² Independent Living Movement Ireland (ILMI) Submission to the Oireachtas Committee on Housing, Planning and Local Government

¹³ The TMOCS report 2011 recommended that traditional types of residential settings with 10 or more people should be phased out and service users facilitated to move to settings with a maximum of four people.

¹⁴ Time to Move on from Congregate Settings: A Strategy for Community Inclusion, Annual Progress Report 2019, HSE

¹⁵ The NASS report includes Intellectual disability, developmental delay, physical, sensory, neurological, learning, speech and/or language disabilities or autism. Mental health as a type of disability is also recorded on NASS where an individual is in receipt of a HSE disability-funded service. A total of 36,649 registered, over 33% of which were children.

setting¹⁶ and 70 service users (<1%) were residing in unstable accommodation. It did not include those who are not in receipt of a disability service.

Advocates will also note that many are excluded from social housing as they are not considered eligible in terms of income threshold despite the additional cost for many associated with living independently with a disability.

Many people from the homeless community, who are residing in congregated settings, have a disability. The latest census found that of the homeless population, 27% indicated a disability, double that compared with the general population, with often more than one disability¹⁷. A recent study found that the prevalence of autistic traits among a Dublin-based homeless population of 106 adults as 9.4%, compared with 1-1.5% diagnosed in the general population¹⁸.

Older Persons, Disability & Ageing in Place

The latest Central Statistics Office (CSO) population projections trends indicate that the number of people over the age of 65 is expected to increase nationally by approximately 34 percent in the period 2021-2031, reaching 1.4 million by 2040, or about 23% of the total population¹⁹.

Up to one in ten persons below 45 years of age had a disability, rising to 20% by age 60. Rates increased sharply above age 70. As people age, their housing needs are likely to change.

According to the Housing Agency, there are significant benefits to society and the individual if they can remain living in the community as they age.²⁰ In order for this to be facilitated in the future, there needs to be sufficient planning that takes into account increasing disability as we age, by forecasting needs and providing universally designed properties or lifetime adaptable homes.

Barriers to Accessing Housing

Inclusion Ireland and the Independent Living Movement in their report 'Tackling the Housing Crisis Disabled People Face' identify key elements which indicate an 'emergency state' in terms of the availability of housing and supports to allow disabled people to live independently²¹. In their report, they call for easier ways to apply for housing, greater supply of universally designed social and affordable housing, and greater availability of supports to live independently.

Members of the Dublin City Council's Housing Disability Steering Group have highlighted the following issues/mechanisms to reduce barriers to independent living, that require national attention, which were flagged to the Advisory Group of the new National Housing Strategy for Disabled People 2022 to 2027:

- Establish a fund for specialised adaptations to new homes for people who have extensive functional impairment and individualised specific needs that cannot be predicated at planning

¹⁶Residential setting includes residential care facilities that are HSE disability-funded such as congregated settings, group homes and houses in the community as well as those that are not funded from the HSE disability budget such as nursing homes

¹⁷ Census 2016

¹⁸ Adult autism in homelessness: prevalence, experiences and support needs in an Irish Context, Dublin City University, 2020.

¹⁹ Housing Options for Our Ageing Population, DHLGH and DoH

²⁰ Thinking Ahead: The Financial Benefits of Investing in Supporting Housing for Older People, The Housing Agency, October 2020

²¹ Our Housing Rights: Tackling the Housing Crisis Disabled People Face, September 2021, Inclusion Ireland/ILMI

and design stage. For some people, it is possible for a person to move into a universally designed home and later apply for the Housing Adaptation Grant/ Mobility Aids Grant Scheme. In certain cases, for an individual with extensive functional impairment it may not be possible to move into the home until specific adaptations are made. This fund would need to be available to carry out works required, certified by an occupational therapist/medical practitioner, where a home has been identified for the individual, but prior to the individual becoming a tenant of a local authority.

- With regard to housing adaptation grants, seek a review of the household income criteria for housing grants which currently includes all persons residing in the home as opposed to the person to whom the grant applies and benefits.
- Review of the Housing Adaptation Grant upper limit of €30,000 which is out of touch with current building prices.
- Seek for the inclusion of Assistive Technology in the Housing Adaptation Grant administered through the Department of Housing, Local Government and Heritage (DHLGH) which can support people to stay in their own homes and minimise the need for costly retrofitting. Assistive Technology can be a solution to support the gap in funding related to the Personal Assistant Scheme. Such technologies have the potential to reduce dependence on personal assistants for the basics of daily living, allowing care hours to be utilised for social activities and creating time to address more complex personal issues.
- With regard to personal assistance funding, address the deficit in availability of personal assistant support hours. The lack of Personal Assistant supports is a major barrier to people with disabilities accessing housing in order to live independently.
- Review Part M of the Building Regulations (2010) to provide for regulations for 'liveable' wheelchair accessible housing.
- Make explicit in the 'Design Standards for New Apartments: Guideline for Planning Authorities', reference to the utilisation of Universal Design principles where there is regulation for larger size apartments that can accommodate UD design.
- Ensure that in terms of planning, there is adequate provision for the fact that when considering numbers, there is deficit in reported housing need for people with disabilities. To provide a better assessment of need, highlight the Irish Wheelchair Association's national campaign '**Think Ahead, Think Housing**' national campaign which encourages people with disabilities to apply to their local authority to secure their future housing needs.

2. THE COUNCIL'S RESULTS

Provision of Social Housing

When examining the achievements of the last 4 years in terms of allocations, the Council has achieved strong results in housing those with a disability. Over the period 2017-2020 we housed 548 households with a disability²². We also facilitated the transfer of 309 households who were existing Dublin City Council tenants with a disability but requested a transfer to a more suitable home. The percentage of those allocated housing averaged at 13% housing allocations and 12% of transfers.

²² Medical priority and those with disability noted.

Table 1: Numbers of Disabled People Housed as a % of total Housed '17-'20

TOTAL HOUSED	6913
DISABILITY TOTAL (12%)	857
INTELLECTUAL	52
MENTAL HEALTH	130
PHYSICAL	628
SENSORY	47

Adaptations and Extensions to Social Housing Stock Scheme

In addition to housing provision, we support people to remain in their homes, where they may require adaptations to remain living comfortably via the Adaptations and Extensions to Social Housing Stock Scheme. The programme addresses the needs of older people or disabled people, who may require adaptations for example stair lifts, ramps, level deck showers. The extension scheme supports households where aged/disability/overcrowding issues require extension of accommodation, for example, to provide a bedroom and accessible bathroom downstairs. Extensions can be very expensive, and confined to what can be reasonably accommodated on an existing site, so there would be a limited number each year, and priority is based on medical assessment. Extensions over a four year period 2018-2021 was 47.

The below table presents the full detail of adaptations and extensions carried out between 2018-2021. The total expenditure over the period was €9,558,989.

Table 2: Number and Type of Alterations to DCC Housing 2018-2021

Alteration Type	TOTAL	2021	2020	2019	2018
Ramp	127	17	31	35	44
Stairlift	113	17	20	37	39
Shower	473	81	77	141	174
Small alterations	830	161	175	267	227
Extensions	47	11	12	13	11

Housing Grants Schemes

Dublin City Council administers three Housing Grants Schemes, funded by the Department of Housing, Local Government and Heritage (DHLGH) which are designed to provide assistance to people making adaptations to their privately owned homes to meet their medical needs, and to older people in poor housing conditions to carrying out essential repairs to their owner occupied homes. These Schemes are designed to provide financial and technical assistance towards the adaptation/improvements to homes to make them more sustainable for independent living.

The Housing Adaptation for People with a Disability:

Similar to the adaptations and extension scheme for social housing, this scheme is designed to assist in the carrying out of works which are necessary for the purposes of rendering a house more sustainable for the accommodation of a person with a disability.

The types of works allowable under the scheme include:

- Provision of bathroom extensions;
- Bedroom extensions;

- En-suite bathrooms;
- Bathroom conversions;
- Garage conversions;
- Under stairs toilet facilities;
- Stair-lifts;
- Thru-floor lifts;
- Electronic environmental controls;
- Adaptations to facilitate wheelchair access to a home.

It includes any other works which are reasonably necessary for the purposes of rendering a house more suitable for the accommodation of a person with a disability. The maximum grant available under this scheme is €30,000. Over a four year period a total of 7,117 grants were approved of which 3,190 were drawn-down amounting to €24,788,912.

Table 3: Housing Adaptation Grant Scheme (2018-2021)

Grant Type	Year	No of Grants paid	# of grants approved but not drawn down	Expenditure
Housing Adaptation Grant for People with a Disability	2018	857	743	€ 7,374,618
	2019	861	409	€7,737,137
	2020	673	438	€ 6,085,861
	2021	799	604	€ 7,164,268
	TOTAL	3190	2194	€20,624,747

The Mobility Aids Housing Grant Scheme:

The Mobility Aids Housing Grant Scheme covers a basic suite of works to address mobility problems including: level access showers; ramps; grab rails; stairlifts and other minor works. The maximum grant available under this scheme is €6,000 or 100% of the approved costs whichever is the lesser. This grant is available to households whose gross annual household income does not exceed €30,000.

Table 4: Mobility Aid Grants Scheme (2018-2021)

Grant Type	Year	No of Grants paid	# of grants approved but not drawn down	Expenditure
Mobility Aids Grant	2018	84	68	€ 324,114
	2019	103	30	€ 415,182
	2020	99	32	€ 389,798
	2021	100	35	€ 331,289
	TOTAL	386	165	€1,460,383

The Housing Aid for Older Persons Grant Scheme:

This Scheme is open to people over 66 years of age and is designed to assist older people living in poor housing conditions to have necessary repairs or improvements carried out. This can include older people with a disability.

Table 5: Housing Aid for Older Persons Grant Scheme (2018-2021)

Grant Type	Year	No of Grants paid	# of grants approved but not drawn down	Expenditure
Housing Aid for Older Persons	2018	136	87	€ 477,416
	2019	163	68	€ 518,730
	2020	204	105	€ 731,643
	2021	259	160	€ 975,991
	TOTAL	762	420	€2,703,781

Housing First Programme

Dublin City Council has embarked on a programme to support people with complex needs in long term homelessness to live in the community through the Housing First model. The latest census found that of the homeless population, 27% indicated a disability, double that compared with the general population²³. The key feature of Housing First²⁴ is the provision of the housing need of the person first followed by wraparound support services thereafter, thus responding to the barriers that often render community living unsustainable in the longer term. Those on the homeless priority category represented, on average, 10% of the total numbers on the Housing Waiting List (2017-2020). In responding to the homeless crisis, the Council has prioritised this category, resulting in 31% of those housed from the housing list, as being those from this category.

3. LOCAL AIMS AND OBJECTIVES

The second National Housing Strategy for Disabled People 2022 – 2027 was published in January 2022. At the local authority level, we aim to support the objectives and the strategy at local level and providing an improved basis for planning and service delivery.

The Dublin City Council Housing & Disability Steering Group has identified 5 local objectives

1. Promote equality of access to housing for disabled people
2. Better Assessment and Planning for Identified Needs
3. Improving Appropriate Supply & Adaptations
4. Providing Appropriate Design
5. Recognising the Centrality of Health Supports

Promote equality of access to housing for disabled people

Dublin City Council's basis for prioritising the allocation of housing is outlined in the Scheme of Lettings for Housing Allocations policy which is established in line with legislation and associated regulations²⁵.

²³ Census 2016

²⁴ Housing First National Implementation Plan 2018-2021

²⁵ Section 20 of the Housing (Miscellaneous Provisions) Act 2009 (and associated regulations)

Priority is determined by two factors; the applicant's broad level of housing need and length of time on the list.

The highest priority for provision of social housing is Band 1 and that includes medical and welfare priority cases, including those with a qualified impairment. Dublin City Council will take into consideration whether a person's existing accommodation is unsuitable for reasons of physical, sensory, mental health and/or intellectual disability within a household in assessing the basis of need for social housing supports. Where it is found that a change in housing will improve or stabilise the applicant's circumstances, they will be prioritised.

Applicants can complete the revised Disability and/or Medical Information Form which must be supported by two healthcare professionals who work with the person with a disability or a medical condition, such as: Consultant; General Practitioner (GP); Mental Health Nurse; Public Health Nurse; Occupational Therapist; and, Social Worker. An Occupational Therapist report must be provided where there is a need for a specific accommodation requirement. If a person is deemed to have a housing need based their medial status, they will be prioritised on band one as 'medical priority'.

We understand that location is of vital importance and seek to be as flexible as possible in this regard. We are aware of the significant importance of being close to support services and family members, when considering housing options for disabled people. At times a home will come available that meets the specific requirements of a disabled person, in an area of their choice. In these incidences, as an exceptional case, will allocate to the most appropriate household on the medical priority list, and not according to the next on list.

The National Housing Strategy for Disabled People suggests a target of 15% of all allocations of dwellings by a local authority being allocated to disabled people. Dublin City Council has set a realistic local target of 10% as a solid and ambitious target given the percentage level on our housing list and taking into account our Scheme of Allocations, where the basis of need is only one of a set of factors determining priority²⁶.

The National Housing Strategy for Disabled People suggests a second target – that 10% of new dwellings in all general social housing developments of 10 dwellings or more are reserved for households qualified under a basis of need of disability. Dublin City Council will have regard to the National strategy's target within our overall Scheme of Lettings for Housing Allocations policy.

Action 1: Award priority status on the housing list where a disabled person's current accommodation is not suitable to their needs and a change in housing will improve or stabilise their condition.

Action 2: Allocations to identify, on exceptional grounds, the most appropriate person(s) on the housing list where universally designed/adapted units come available, meeting their specific needs.

Action 3: Monitor on an annual basis number of units allocated to people who have registered as having disability as their primary basis of need and those with disability noted.

Target 1: Maintain a target of at least 10% of allocations to those with a stated disability.

²⁶ there is a sizable difference between the percentage of people with a stated disability between County/City Council's, with Dublin City Council being the lowest, at 1% (certified medical priority based on disability)²⁶

Better Assessment and Planning for Identified Needs

There are currently two categories for those with a disability on the Council's housing and waiting lists:

- **Medical Priority** – where a person's medical condition or disability is certified. To be eligible for Medical Priority the applicants' current accommodation is confirmed as not suitable to meet the needs *and* a change in housing will improve or stabilise the circumstances of the person with a disability or medical condition. This must be certified by two registered medical professionals. We currently have 284 persons who have medical priority on the basis of their disability.
- **Application with a Disability Noted:** This includes applicants where they have noted that they have a disability but this is not supplemented by confirming information or certified by a medical professional. In this case, the applicant would not be prioritised on the basis of their disability. While the number of people with a certified medical priority and disability as basis of need is 1%, when including those uncertified but with a disability noted on their form, the total number of people the figure is 5% (housing waiting (6%) and transfer list combined (4%))²⁷.

Table 6: Number of People with 'Medical Priority' on Housing and Transfer List

Housing List with Medical Priority²⁸	Grand Total
Intellectual	14
Mental Health	32
Physical	79
Sensory	16
Grand Total	141
Transfer List with Medical Priority	Grand Total
Intellectual	15
Mental Health	8
Physical	105
Sensory	15
Grand Total	143

Table 7: #/% of People with Disability 'Certified & Noted' on the Housing and Transfer List

Housing Waiting with disability recorded	Housing List
Waiting List	Grand Total
Intellectual	110
Mental Health	287
Physical	334
Sensory	74
Grand Total	805
TOTAL HOUSING WAITING	13967

²⁷ DCC Housing & Transfer Waiting List YTD October 2021

²⁸ DCC Housing & Transfer Waiting List YTD October 2021

% with Disability Recorded	6%
Transfer List with disability recorded	Transfer List
FULL LIST	Grand Total
Intellectual	88
Mental Health	185
Physical	290
Sensory	73
Grand Total	636
TOTAL TRANSFER	16128
% with Disability Recorded	4%

For some disabled people, they can live comfortably in standard accommodation that does not need to be designed specifically to meet their needs. For others, they may need to live in accommodation that has been specifically adapted to their needs, or may benefit from a change in accommodation, for example, they may need to move from a top floor apartment where there is no lift, to a home that is ground floor or has a lift facility.

When considering those uncertified, this is likely to include people whose disability is not compromised by their current living condition, people who have been assessed for medical priority but have not met the threshold (their current living situation is suitable and not compromising to their health), however, it may also include people who may qualify or perhaps, may need their application re-assessed if their needs have changed since their original application. Awareness of the new HDM-Form 1 will be important in this regard.

Disability and/or Medical Information Form

The new revised Disability and/or Medical Information Form [HDM-Form 1](#), published in May 2021 from the Department of Housing, Local Government and Heritage, will supplement the Social Housing Support application form. It provides people with the opportunity to have their specific needs recognised within their application under the four disability categories. It seeks information on a person's current living condition and clarity on how a change of location, accommodation type and accommodation design would benefit them. Inherent in this means that, for example, a person with who uses a wheelchair can indicate if they require a wheelchair liveable house.

This form will provide the Council with more accurate information about the needs of people with disabilities and will support us to better plan for specific needs of applicants. Using this new form and previously assessed information, we will be able to extract details on the number of people on the housing and transfer list that require ground floor, adapted and/or wheelchair liveable accommodation.

Capturing the Information of those not already on the Housing List

The Irish Wheelchair Association's 'Think Ahead, Think Housing' campaign is attempting to address the gap, in terms of getting an accurate assessment of the numbers of disabled people with a housing

need, and aims to supporting disabled people who are eligible to apply to their local authority so that they can be included in social housing planning and delivery for the future²⁹.

Taking Cognisance of Emerging Need

One of roles of the Housing Disability Steering Group (HDSG) is to ensure that targets set out in the Local Authority Housing Disability Strategy Plan are realistic yet challenging and to ensure that while the targets are based on the identified need (Housing Waiting List) that they take cognisance of emerging need.

Some level of future proofing for the consideration of housing needs for older persons is required. By 2026, it is expected that the population with a disability will increase by roughly 20 per cent. 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 population³⁰.

There are currently 2,543 older persons on the housing and transfer list combined, representing 8% of the total list³¹. If we consider our current list and factor in a 20% increase in older persons, based on population projections, this equates to 3,052 or 9% of the total transfer/waiting list. While not every older person has a disability, we know that disability increases with age and it would be prudent to consider providing for this by maximising the number of universally designed units currently being built.

Action 4: Annually collate and report on the number of people with disabilities on the waiting list with their stated disability specified.

Action 5: Review and assess the number of people on the immediate waiting list that require ground floor, adapted or wheelchair livable accommodation.

Action 6: Utilise this information to inform the planning and design phase of projects in considering the housing needs of disabled people on the housing list for the particular area.

Action 7: Further develop estimates of the likely emerging housing need amongst disabled people over the lifetime of the plan to better inform Dublin City Council's housing strategy.

Promoting Appropriate Design Options

Building Regulations

All those seeking to build or construct new developments are bound to follow specific regulations, whether this is a local authority, an AHB or a private developer.

Part M (2010) of the Building Regulations requires that adequate provision be made for people to access and use a building, its facilities and its environs. Part M Building Regulations, states that: 'those involved in the design and construction of buildings should also have regard to the design philosophy of Universal Design and consider making additional provisions where practicable and appropriate'. Universal Design requires that all environments can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size, ability or disability.

Part M of the building regulations has improved disability access, however, in terms of housing, it only require housing to be 'visitable' or accessible, but not 'livable'. That is, while the regulation provides for the fact that a person must be able to: safely and conveniently approach and gain access; have

²⁹ <https://www.iwa.ie/services/accessible-housing/think-ahead-think-housing/>

³⁰ National Disability Authority

³¹ DCC Housing & Transfer Waiting List YTD October 2021

access to the main habitable rooms at entry level and a bathroom must be provided at entry level, they do not provide for a home to be 'livable' by someone who is, for example, a wheelchair user.

Universal Design (UD) or Lifetime Adaptable Homes

The application of Universal Design thinking to homes recognises differences and accommodates them through the integration at the outset of the design and construction stages of:

- Flexibility and ease of adaptability to meet people's changing needs over time in a cost effective way
- Sustainable design to improve comfort and energy efficiency
- Smart technologies to enable ease of living independently for longer.

The principles of UD are:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptible Information
5. Tolerance for Error
6. Low Physical Effort
7. Size & Space for Approach and Use

Living in a UD Home helps to avoid the need to move when the home is no longer suitable for a person's needs and/or eliminates the need for costly building works as needs change over time. A UD Home environment enables the widest possible number of people to participate at home, in society, and to live independently.

An important element in achieving sustainability in the design of residential units is the ability of the design to accommodate how a person's needs may change over time, for example decreased mobility as residents may acquire some level of mobility impairment through accident, or inevitably through old age.

Statutory Regulations regarding Apartments Sizes

The majority of largescale new developments in Dublin City will be made up of apartments. The Sustainable Urban Housing: Design Standards for New Apartments³² sets out statutory guidelines that all those building new apartments must follow. It provides minimum floor area for apartments as outlined below.

Unit Type	Bedspace	Floor Area (min) sq. m	>51% 10% larger* sq.m
Studio	1 bed	37	
1 bed	1B 2P	45	49.5
2 bed	2B 4P	73	80.3
3 bed	3B 5P	90	99

³² http://www.housing.old.gov.ie/sites/default/files/publications/files/december_2020_-_design_standards_for_new_apartments.pdf

Section 3.8(a) of this document says that, in the interest of safeguarding higher standards, where there is a scheme of 10 or more apartments, over 50% of apartments must be 10% larger. We encourage all those planning new developments to have regard to the Universal Design Guidelines for New Homes in Ireland and where possible, to design the larger units with universal design principles in mind³³.

In January, 2022, the Department of Local Government and Housing launched the Design Manual for Quality Housing³⁴. It includes typical internal layouts for minimum sized and UD standard homes. The numerous layouts demonstrate how UD homes can be designed at 10-16% larger than minimum size. There are examples of 2bed 4person homes, and 1bed 2person homes meeting UD standards with only 10% extra floor area above minimum sizes.

Government Targets regarding Universal Design/Lifetime Adaptable Homes

People who have a mobility impairment and who are or who may become full-time wheelchair users require appropriately designed and futureproofed housing. The Housing Options for Our Ageing Population Policy Statement, Prepared by the Department of Housing, Planning and Local Government and the Department of Health in 2021 contains within it the follow actions:

- 4.4 to ensure that 50% of apartments in any development that are required to be in excess of minimum sizes are suitable for older people/mobility impaired people and that a template layout guide will be developed for this.
- 4.6 seeks, in partnership with industry, to introduce measures to ensure that over a five year period, delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles³⁵.

Matching the housing needs of disabled people within statutory guidelines

The Design Manual for Quality Housing and Housing Options for our Ageing Population documents demonstrate a clear commitment to do more to ensure adequate provision for housing for disabled people and older persons as they age. A Universal Design home offers more for the widest range of potential residents. There is a recognition that in specific cases, individuals have precise design requirements whereby the design of the home environment needs to be tailored to meet their requirements. In this case, the size of the home sits outside of the statutory requirements and the home has to be specifically adapted and designed to meet their needs.

During the last strategy, the Steering Group, with the support of City Architects, developed a draft template for adapted units for wheelchair users for approval by the Department of Housing, Local Government and Heritage. In promoting the production of more disability-friendly housing, we will continue to support the Department in reviewing design options in line with the commitments contained within the Housing Options for Our Ageing Population.

³³ Universal Design Guidelines for New Homes in Ireland, Centre for Excellence in Universal Design, National Disability Authority, 2015.

³⁴ <https://www.gov.ie/en/publication/b3e02-design-manual-for-quality-housing/>.

³⁵ Housing Options for an Ageing Population, Government of Ireland Policy Statement, Prepared by the Department of Housing, Planning and Local Government and the Department of Health.

Meeting our requirements under Housing for All in terms of Housing Provision for Disabled People

The Housing for All strategy identifies a number of key actions to increase and improve housing options and supports for people with disabilities. We will meet the objectives set out in policy 7.3 by considering the housing needs of disabled people and feeding that into our Housing Strategy and as part of their Development Plan process³⁶.

Action 8: Continue to further explore ideas around suitable design to provide universal design/wheelchair livable accommodation and lifetime adaptable accommodation designs.

Action 9: Nominate a Disability Friendly Housing Technical Advisor to advise on appropriate design

Action 10: Advocate for the inclusion within the development plan that, where possible, the layout of the larger units in new apartments are designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015.

Target 2: Have regard to the National Housing Strategy for Disabled People's stated target of a minimum of 50%³⁷ of apartments in newly approved developments of 10 or more dwellings, which are required to be above the minimum size, are suitable for older people/mobility impaired people, using universal design principles, where it is possible to do so within parameter specified under the regulations set within the Sustainable Urban Housing: Design Standards for New Apartments.

Promoting Adequate Supply and Adaptations

The Housing for All targets for Dublin City Council area over the plan period (2022-2026) is 9,087 new social homes. A Housing Delivery Action Plan (HDAP) for the period has been developed indicating annual projections and targets for social, affordable and cost rental housing. This will be informed by a Housing Needs and Demand Assessment (HNDA), indicating the specific nature of need and the type and size of unit required.

DELIVERY STREAMS

There are a number of delivery streams through which Dublin City Council sources new housing stock. The degree to which we can influence and negotiate on the type of property provided is contingent upon a number of factors including whether or not the property is turnkey or whether or not it is possible for us to engage with parties before the planning process. Additional considerations of both the funder/developer will be related to whether the options offer value for money and are based on an identified housing need for the area, based on the local authority housing list.

Construction on Publically Owned Land: Where we are engaging in plans for construction on local authority land, including regeneration, our design teams will work towards ensuring that the principle of universal design is central to any discussions. Where regeneration is concerned, it is possible to have a prior understanding of the demographics of the clients who will eventually likely reoccupy the space and can plan for any disabled person's needs. Where there exists a person on the waiting list for an area where a project is being planned, who requires an adapted or wheelchair liveable home, this will be factored into the design plan.

Approved Housing Bodies (AHBs): AHB's can apply for the Capital Assistance Scheme (CAS) which is a specific scheme to provide funding for the provision of housing for priority groups with specific needs

³⁶ Housing for All 2. Pathway to Eradicating Homelessness, Increasing Social Housing Delivery Inclusion, p.68 Policy Objectives

³⁷ The exact percentage will be determined by the Dublin City Council Development Plan targets (2022-2027)

including older persons, disabled persons, homeless persons and others. The Capital Assistance Scheme (CAS) is operated on an open basis and AHBs can submit new proposals to local authorities at any time. CAS is administered by the local authorities who may advance loans of up to 100% of eligible project costs to AHBs.

Capital Advance Leasing Facility (CALF) is another fund available to AHB's to increase their housing stock. Both schemes enables AHB's to work collaboratively with Dublin City Council, and others to increase social housing supply.

Percentage of new Developments for Social Housing: Legislation obliges developers to deliver at least 10% of their development for social housing with additional opportunity for affordable housing under new legislation. This maximises the opportunity for the delivery of social housing units and secures the principle of integrated mixed tenure developments. We encourage all developers to consider universal design principles and to maximise opportunities to provide universally designed accommodation units.

Competitive Dialogue/Turnkey Properties: A turnkey property is a property that is handed over to Dublin City Council, ready for occupancy. Traditionally there would not be an opportunity to influence the design, however, a new introductory process of competitive dialogue may provide some opportunity to input into design decisions on some turnkey properties.

Adaptations to existing stock and void Restoration: The Housing Adaptation Grant for People with a Disability Scheme provides grant aid to applicants to assist in the carrying out of works that are reasonably necessary for the purposes of rendering a house more suitable for the accommodation needs of a person with a disability. The scheme is administered by local authorities. The Scheme of Housing Aid for Older People is available to assist older people to have necessary repairs or improvements carried out to their homes. The Mobility Aids Grant Scheme is available to fast track grant aid to cover a basic suite of works to address mobility problems, primarily, but not exclusively, associated with ageing. The cost effectiveness of adapting a void property to an adapted unit would have to be considered on a case by case basis with value for money and practicality considerations.

Affordable and Cost Rental Homes

The Government has identified a significant gap in affordable housing provision for people who are earning incomes but cannot afford to rent or buy a property. Inclusion Ireland and the Independent Living Movement in their report 'Tackling the Housing Crisis Disabled People Face' identified the need for greater supply affordable housing as well as social housing.

Cost rental homes are homes where rents are charged based on the cost incurred in delivering, managing and maintaining homes, affordable to those on moderate incomes for those experiencing financial difficulty accessing housing, or meeting the on-going cost of accommodation.

Affordable housing schemes aim to help lower-income households to buy their own homes. They offer eligible first-time purchasers the chance to buy newly constructed homes and apartments at prices significantly less than their market value.

Action 11: Wherever possible, advocate for the provision of universal designed units when engaging with prospective housing projects.

Action 12: Work with all housing sections: new developments, regeneration, Part V and Public Private Partnerships to ensure that, where possible, Universal Design housing is at the center of all new housing construction.

Recognising the Centrality of Health Supports and Housing Proximity to Health Supports

Local authorities are responsible, in accordance with the Housing (Miscellaneous Provisions) Act, 2009, for the provision of housing services, while the provision of relevant health and personal social services is the responsibility of the HSE.

While the provision of revenue funding for on-going health service related support is a matter for the Health Service Executive (HSE), members of this Housing Disability Steering Group felt strongly that there should be a strategic action that highlighted the centrality of health supports. This is to ensure that those with impairments have the right level of support to enable them to live independent lives in the community. The Steering Group also wanted to highlight issues around considering mechanisms that would support people that are in long term acute care or residential care settings to live independently.

A significant programme of reform is underway in disability services in Ireland. The Department of Health's Value for Money and Policy Review of Disability Services in Ireland (2012) and the National Implementation Framework (2013) provided the evidence base and recommended the restructuring of disability services in Ireland through personalised supports and more effective systems of resource management.

Transforming Lives is the programme to implement changes informed by the recommendations from the Value for Money and Policy Review of Disability Services. The 2015 Report on the Implementation of Transforming Lives articulates the vision of the programme "to contribute to the realisation of a society where people with disabilities are supported, as far as possible, to participate to their full potential in economic and social life, and have access to a range of quality personal social support and services to enhance their quality of life and well-being". This is a mammoth task and there are significant barriers and impediments to its progress but also many examples of good practice and desire for change³⁸. Service providers have been working to implement this policy with service users but due to constraints in the availability of suitable accommodation and supports, some service users are still living in larger congregated settings³⁹.

Home support services for persons under 65 years are funded through Disability Services. Home supports can also be provided through the generic home help service, which is operated through Older People's Services. Home care packages are provided locally within a given Community Healthcare Organisation (CHO) Area and each CHO has a budget for Disability Services on an annual basis and has to plan and deliver services within its allocation in accordance with the HSE National Service Plan.

In the recent Ombudsman's Report 'Wasted Lives', looking into the cases of people under 65 years in nursing homes, it notes that, with respect to those with acquired neuro-disability who require home care packages to support a discharge home, funding is sought through individual CHO budgets. If funding is not approved, there is currently no process for escalating the request for funding and the person can remain in the acute hospital setting or alternatively, will be placed in long term care.

Within the HSE it is recognised 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

³⁸ National Quality Improvement Operational Plan Disability Services in Ireland 2018-2020

³⁹ Annual Report of the National Ability Supports System (NASS) 2020

home or access to funding for a new or changed care package⁴⁰. The HSE states that it wants to have multi-annual funding resources in place in line with the programme for Government and it is actively planning via the 2021 Estimates Process to target the nursing home area where under 65s are concerned⁴¹. The Programme for Government 2020, seeks to continue with the successful de-congregation programme and complete a further move of more people with disabilities from congregated settings to homes in the community, with the necessary supports.

As outlined in the new Mental Health Policy Sharing the Vision: A Mental Health Policy for Everyone⁴², under the Social Inclusion Domain, it is recognised that where a person has been assigned social housing, there is a need to ensure that those with complex mental health difficulties receive multi-disciplinary supports from health professionals and voluntary organisations to improve their quality of life. It notes that people will also require assistance to sustain tenancies and live independently. This complements the guidelines for allocation for people with a disability which states that, in order to address such needs successfully, the provision of appropriate housing services must be accompanied by the provision of relevant health and personal social services, as appropriate, in accordance with individual care/support plans⁴³.

Sharing the Vision recognises the vital importance of housing and mental health sectors working together to achieve de-congregation of institutional settings. It notes that sustainable resourcing based on identified need for tenancy related/independent living supports for those with complex mental health difficulties must be considered for service users moving from HSE supported accommodation to independent living and for individuals in hospital or homeless services identified as having a housing need.

Action 13: Continue to work with the Housing Agency and HSE to in terms of how to better support disabled people who need support, appropriate to their needs, who will be or who are already housed in the community.

2: AWARENESS AND PROMOTION

Dublin City Council Awareness and Promotion

The Dublin City Council Chair of the Housing Disability Steering Group actively works to promote the provision of housing for disabled people, based on the identified need and projected needs. This involves the following:

- Presentation of the Final Dublin City Council Housing Disability Strategy to the Housing Strategic Policy Committee
- Joint submission with Age Friendly Ireland on the 1st Draft Dublin City Council Development Plan 2022-2028 highlighting the need for specific targets for Universal Design

⁴⁰ Supporting People with Disabilities to access Appropriate Housing in the Community – Guidance Document 2020 as part of Transforming Lives: Programme to Implement the Recommendations of the ‘Value for Money and Policy Review of the Disability Services in Ireland’.

⁴¹ Wasted Lives: Time for a better future for younger people in nursing homes: An investigation by the Ombudsman, 2021

⁴² Sharing the Vision, A Mental Health Policy for Everyone, Department of Health, 2021

⁴³ National Guidelines for the Assessment and Allocation Process for Social Housing Provision for People with a Disability

- Joint submission with Age Friendly Ireland on the 2nd Draft Dublin City Council Development Plan 2022-2028 highlighting the need for specific targets for Universal Design
- Engagement with allocations to review disability needs and requirements in the short to medium term and longer term projections for Universal Design requirements.
- Engagement with Dublin City Council Age Friendly Ireland on areas of common interest with regard to the delivery of universally designed units.
- Engagement with City Architects regarding requirements for Universal Design and Disability specific requirements
- Engagement with Housing Supply & Delivery regarding the necessity to plan for and seek opportunities to progress Universal Design units via various mechanisms.
- Engagement with the Department of Housing, Local Government & Heritage and City Architects on Universal Design layouts.
- the Housing Disability Steering Groups will report quarterly on the implementation of the local strategic plans regarding housing with a disability to the Chief Executive and the Strategic Policy Committee.

Housing Disability Steering Group (HDSG) Awareness and Promotion

Representative Organisations Awareness and Promotion

All local authorities, when seeking approval for projects in their capital appraisal, must demonstrate the specific needs in the area. In order to identify the need, local authorities must refer to their housing waiting list where they can also identify any special needs where there is a medical priority identified. It is thus imperative that organisations working with, for, and on-behalf of, disabled people can work to increase the supply and delivery of housing suitable to their needs by promotion within their networks of the need to be on the housing list.

The Irish Wheelchair Association has launched a national campaign '*Think Ahead, Think Housing*' to tackle the shortage of social housing for people with disabilities to ensure people with disabilities are included and represented in social housing planning and delivery. The *Think Ahead, Think Housing* campaign is encouraging disabled people to state their current and future social housing needs by applying to their local authority through the newly revised housing application form.

Inclusion Ireland and the Independent Living Movement in their report 'Tackling the Housing Crisis Disabled People Face' note that many disabled people find it hard to apply for housing and that it is hard to fill out the forms and hard to know what you need to do⁴⁴. Dublin City Council have an easy read guide available on our website: Easy to Read Guide to Filling in the Social Housing Support Application Form. Organisations working with, for and on-behalf of disabled people can support them through the process of the application form and can share this easy read guide to explain how the system works.

⁴⁴ Our Housing Rights: Tackling the Housing Crisis Disabled People Face, September 2021, Inclusion Ireland/ILMI

Appendix 1 SUPPORTS: SOCIAL AND CARE

During the drafting phase of this National Disability Strategy 2022-2026, the Housing Agency requested each Steering Group submit examples of specific needs and good practice for each of the four disabilities. Representatives on the HDSG collated details for their specific area. As we did not have a representative from the sensory community, we sought input from organisation representing Autistic people.

For the purpose of this section, it will look at the four types of disability defined by the Disability Act 2005 separately. It will focus on the specific needs of each area, identify who needs support, the type of support required, and how organizations can work together to achieve this. It will look at areas of good practice where possible.

MENTAL HEALTH

Mental health policy, as articulated in A Vision for Change (AVfC), commits to supporting people with mental health difficulties living in HSE hostels to move to independent living in the community. Housing policy, as formulated in the National Housing Strategy for People with a Disability also incorporates commitments to address the needs of people with mental health difficulties.

Who needs Support:

- housing for people with a mental health difficulty who live in congregated settings
- housing for people with a mental health difficulty who live in the community (not congregated settings)
- housing for people with mental health difficulties who are homeless
- housing for people with a mental health difficulty who are inappropriately long-stay patients in acute inpatient mental health units

People may be living in the family home where it is no longer appropriate, staying temporarily with family members or friends, living in homeless accommodation, delayed in discharge in hospital settings due to the lack of appropriate housing options, living in unstable Private Rented Accommodation, Living in a LA/AHB tenancy with high levels of antisocial behavior that is affecting their mental health, living in unsuitable accommodation (e.g. inappropriate traveler accommodation), lack of move on accommodation upon release from prison.

Types of Support

- Tenancy support for people to move congregated residential settings into independent living, in line with their Support Plan.
- Alternative housing models for people who are long-term residents of HSE residential services.
- For those not coming from residential settings, access to tenancy support to assist people with their move and assist in linking them in with their new communities where appropriate.

Examples of Good Practice

Important progress has been made and good practice developed through recent pilot projects that provide access to appropriate housing, as well as practical supports to sustain independent living, along with mental health rehabilitation supports.

Doras & Slán Abhaile Project in Dublin North City – is a collaborate project with HAIL, HSE Dublin North City Mental Health Services, Dublin City Council and Fingal County Council. This extremely successful service was one of the first of its kind in Ireland, established in 2011. The participants had ‘floating support’ provided throughout each of the phases: preparation; transition; maintenance/ sustainment, by non-clinical support workers, complemented by clinical support from the HSE Rehabilitation Team.

Creating Foundations Service is a HSE led housing support service in partnership with Focus Ireland. Working with the local authorities, the mental health teams, family members etc., the Housing Support Workers provide individualized housing related supports to mental health service users.

The Care and Support Plus housing model is currently being developed in HSE CHO7. Originally developed in England in partnership between the not-for-profit ‘One Housing Group’ and an NHS Trust in London the Care Support Plus model provides 15 high quality self-contained supported housing units, helping service users prepare for the transition to other forms of accommodation. The service has reduced hospital stays and costs to the health services by more than £400,000 per annum.

Better aligning Care and Support and Opportunities for collaborative working

Collaborative working is required with agreed support packages to ensure people continue to receive the level of support required from HSE Mental Health Services, and have the opportunity to avail of secure tenancies.

Sharing the Vision: A Mental Health Policy for Everyone, the successor to AVfC, recognises that in order for this vision to be successful, roles need to be clarified between housing and mental health sectors. It notes that a joint protocol agreed by the DoH and the Department of Housing, Planning and Local Government (DHPLG) in consultation with key stakeholders is required to assist people living in HSE mental health service congregated settings to move to mainstream community-based living.

In terms of the recommendations from the Sharing the Vision: A Mental Health Policy for Everyone this we will, the Housing Steering Group will:

- Liaise together with representatives of people with complex mental health impairments include their specific housing needs
- Once protocols have been developed between the DoH and the DHLGH, to guide the effective transition of individuals from HSE-supported accommodation to community living, including funding for support provision for tenancy tenancy-related/independent living supports for service users with complex mental health difficulties, we will seek practical ways to action these protocols.

In terms of mental health and housing delivery, consideration is given to the fact that the most sought after unit type is one-bed house or apartment, to be developed in areas that are close to services. We will take this into consideration when opportunities to influence the nature of a development in an area close to services is possible.

PHYSICAL HEALTH

There are many variations and levels of complexity with someone who has a physical impairment. In consideration of housing, Dublin City Council will considers a person’s basis of need for housing, in addition to their time on the waiting list. Priority is given to those where they are living in accommodation that is unsuitable to their needs.

Who needs Support:

- People in HSE Community Residences

- People that are living in unsuitable or unstable accommodation, which is impacting their ability to living active, fulfilling and independent lives.

Types of Support

- Personal Assistance Service
- Home Care Support
- Assistive Technology

Alternative housing models for disabled people who have an extensive functional impairment that requires a personal assistant and a home carer to support them to live independently, getting the timing right between accessing both an appropriate accessible home and a support service can be a challenge. It can often be the final piece in the jigsaw towards living a full, independent life.

A person in receipt of a personal assistant can direct them to carry out tasks both inside and outside of the home, including personal care, domestic duties, assisting in day-to-day tasks such as shopping, support in the workplace or socialising, which is different to a carer. Personal assistance services and home supports are closely linked, given that many service users require both home support services and personal assistance.

Home Care packages and Personal Assistance Services are applied to via an application process or through referrals from public health nurses or other community-based staff. Resource allocation is determined by the needs of the individual, compliance with the prioritisation criteria and the level of resources available. The Independent Living Movement notes that often disabled people are caught in a Catch-22 situation where, when they are assigned a home, they cannot move into the home until the package is in place, and this can take up to 6 months for approval and may not be at the right level, due to constrained resources.

Examples of Good Practice

Assistive technology can support people to access their human rights disabled people, older people and their families have a growing expectation to be included in all aspects of society as a basic human right. Where technology is used well and appropriately, it has the potential to support meeting many of the obligations under the UN Convention on the Rights of Persons with Disabilities: Article 4.1, for example, highlights the importance of access to Assistive Technology at an affordable cost as a key component of an inclusive society. Section 3 of The Act cites Assistive Technology as one of the supports that can be used to maximise a person's ability to make and communicate their decisions.

The use of Assistive Technology can be used to manage environmental controls, including for example, switch lights on and off, open the front door, or change the channels on the television.

Enable Ireland and Disability Federation of Ireland's study on Assistive Technology⁴⁵ for Persons with Disability and Older Persons found that a modest capital investment can greatly enhance an individual's ability to live independently, or with reduced supports. They cite a value for money example where in investment of environmental controls to the value of €18,500, which meant that her Personal Assistant supports could be reduced by 41% or from 168hrs per week to 99hrs. The total cost of her Assistive Technology was less than one third of the annual cost of round-the-clock Personal Assistant support.

Better aligning Care and Support and Opportunities for collaborative working

⁴⁵ Assistive Technology for Persons with Disability and Older Persons: A Discussion Paper, Enable Ireland and Disability Federation of Ireland, 2016

There are protocols in place with the HSE with respect to the allocation of home care and personal assistance and this is subject to funding, something which is beyond the jurisdiction of a local authority or the Housing Steering Group to determine, however, we will continue to work closely with the HSE and service providers, when a person who is linked into services and is transitioning from residential care or where a person moving to a local authority property. We are also suggesting that the role of assisted technology could pay a part in

INTELLECTUAL

Inclusion Ireland, the National Association for People with an Intellectual Disability notes that the absence of available support services may disproportionately affect people with the highest support needs as they cannot live independently with low levels of support or without any support. They note that there are extra barriers such as the absence of available support services, the lack of accessible houses and availability of accessible information, and the extra costs associated with having a disability⁴⁶.

Who needs Support:

- People living in congregated settings separate from communities
- People living in community residences that are no longer fit for purpose or do not allow for changing needs.
- People with intellectual disabilities living in unsuitable or unstable accommodation which impacts on a person's care and restricts their ability to live a full and meaningful life. Examples of these include: living in the family home where it is no longer appropriate due to aging carer profile, delayed in discharge in hospital settings due to the lack of appropriate housing options, living in unstable Private Rented Accommodation, living in an environment that is not supportive of an individual's mobility needs and poses a risk to safety.

Types of Support:

- Tenancy support for people to move from congregated settings into supported living within the community.
- Housing opportunities and tenancy support for people who are currently residing in community residences that are not fit for purpose.
- Secure appropriate tenancies and access to tenancy support to assist people with their move and assist link them in with their new communities where appropriate.

Examples of Good Practice

HSE Aras Attracta Mayo: Closure of Institution and supporting people to transition to their own homes in the community. Collaborative working with support from Genio.

Cheeverstown SSDL Project: Several individuals have been supported to access appropriate housing within their local community with the support of SDCC, DCC, Cheeverstown and AHB's. These individuals all report an improved quality of life and have become important and active members of their community.

Potential Adaptation to Disability: Housing First Model: There are differing levels of intellectual impairment that will require different inputs to support an individual to live independently. Inclusion Ireland suggests that a potential model that is currently being piloted with the homeless population, is to provide housing for people with intellectual disabilities through the Housing First model that

⁴⁶ Housing for people with intellectual disabilities: The lack of supports for independent living, Inclusion Ireland, November 2019

provides for the housing need of the person first followed by wraparound support services thereafter⁴⁷.

Opportunities for collaborative working

Collaborative working is required with agreed support packages to ensure people continue to receive the level of support required from HSE/voluntary bodies, and have the opportunity to avail of secure tenancies. Both independent and shared housing options should be available for people, in line with their Person Centered Support Plan. Tenancy support services should be made available to assist people make this transition, and work with their families, informal supports, housing services, social services and medical providers where appropriate. Additional HSE funding is required to allow for the de-bundling of care supports when individuals begin to transition from congregated settings.

DCC to collaborate with the local intellectual disability support service providers and Approved Housing Bodies to ensure specific housing options are made available for people with an intellectual disability. Consultation with service users and families who have experience of transitioning and those who hope to move home in the future is important to ensure planning is person centred and inclusive. Creating more inclusive and easy-to-read information is important to support inclusion of all involved in the process.

Where purpose built properties are being developed, Dublin City Council will work closely and collaboratively with all parties such as AHB's and the HSE.

For disabled people who require supports to live independently, we will work with the HSE and the Housing Agency to establish protocols that support the work of the HSE on the clinical and health support side with supports that take into account an individual's supports around tenancy sustainment.

SENSORY

This section provides a specific example related to housing for those with sensory difficulties who are autistic. Autism, as defined by ASIM, is a lifelong neurodevelopmental difference which relates to how a person interacts with others and how they experience the world around them.

Autism is a lifelong developmental condition that affects the way a person communicates, interacts and processes information. Commonly accepted autistic traits are; challenges with communication and social interaction, repetitive and restrictive patterns of behaviour and difficulties with sensory processing and executive function (ASIAM 2020). People with autism also commonly display strengths in relation. The autism spectrum refers to the range of ways the condition presents in an individual which can vary greatly from person to person and throughout their life. Due to the range of the spectrum some individuals also have an intellectual disability, while others are of normal or exceptional cognitive ability. Other issues that affect those with autism are sensory sensitivities i.e. being under – (hypo) or over – (hyper) sensitive in each of the sensory modalities. An individual may be hypo-sensitive to a particular smell while being hyper-sensitive to a specific type of lighting in a room. Such sensitivities vary from person to person and even within a person, i.e. during times of stress the person may experience changes in their usual levels of sensitivity in that certain sounds, for example, are no longer tolerable. Individuals with autism are also at risk of developing mental health

⁴⁷ Housing for people with intellectual disabilities: The lack of supports for independent living, Inclusion Ireland, November 2019

issues such as anxiety, depression and psychosis. They may also have other conditions such as epilepsy, metabolic disorders such as phenylketonuria, and genetic conditions such as fragile X syndrome and physical disabilities.

People with autism are more likely to experience difficulties establishing relationships, accessing employment and utilising resources within their community. Thus, the very nature of autism means that individuals on the spectrum are at greater risk of social isolation and exclusion from society in comparison to their peers.

People in the homeless community present with a higher level of autistic traits than in the wider population. A recent study found that the prevalence of autistic traits among a Dublin-based homeless population of 106 adults as 9.4%, compared with 1-1.5% diagnosed in the general population⁴⁸. Living in a congregate setting with many other people is likely to be triggering experience for someone with sensory difficulties.

Who needs Support:

- People with autism that require adaptations to their existing properties
- People living in congregated settings separate from communities
- People living in community residences that are no longer fit for purpose or do not allow for changing needs.
- People with autism living in unsuitable or unstable accommodation which impacts on a person's care and restricts their ability to live a full and meaningful life.

Types of Support (dependent on the person's presentation/need):

- Flexible and individual approach based on person's needs
- Adaptations to properties that allow for sensory and/or physical needs
- Consideration of proximity to services where a person is engaging with support services
- Tenancy support for people to move from congregated settings into supported living within the community.

⁴⁸ Adult autism in homelessness: prevalence, experiences and support needs in an Irish Context, Dublin City University, 2020.

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