



Public
Participation
Network
Sligo



Sligo PPN Housing Thematic Network

Removing Barriers to Housing

About this Series

In recent years the issue of housing has become an increasingly critical priority for the Sligo community. Issues around housing have been a constant across PPN community engagement and consultation processes, notably the Community Vision for Wellbeing. Some of the comments raised through this process included;;

We need a variety of house types within communities throughout the County to allow for households down-sizing or trading up as needed within the same area and for a variety of income groups.

There should also be sheltered housing provided in community settings.

A variety of schemes need to be introduced to ensure that homes are affordable.

Everyone in Sligo should have a suitable home and the Council should ensure that derelict or abandoned buildings are put back into use to provide a variety of housing options.

Planning should ensure future proofed building design wherever possible to create the opportunity for adaptation as family/ household needs change.

People need to be encouraged to live in small towns and villages, redevelop houses as needed and enabled to develop accommodation alongside small businesses.

In looking at the potential for the Community sector and PPN to use their platform to try and progress these issues, the Sligo PPN Thematic Housing Network was established by Sligo PPN representatives who brought together key stakeholders to discuss and collaborate.

The network decided to develop a series of policy papers addressing key agreed upon housing issues. The papers would be used by PPN representatives at the decision making table, would be presented by Sligo PPN representatives to the relevant government departments and would also be made public for use by the community sector.

These papers were compiled by the Sligo Public Participation Network (PPN) Housing Thematic Network with assistance from Social Justice Ireland, who were commissioned to carry out the research and compile the first drafts.

There are 5 papers in total;

This paper is about **Removing Barriers to Housing**.

The other four papers in this series are titled:

Vacant Homes

Home Heating Costs

Right Sizing

Traveller Accommodation

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Introduction

The Sligo Public Participation Network (PPN) is committed to the implementation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). To this end, we have engaged the assistance of the Sligo Disabled Person's Organisation (DPO) to ensure that the lived experience of disabled people in County Sligo is central to this paper. This is reflected in the title, 'Removing Barriers to Housing', which references to the social model of disability.

The preamble of the UNCRPD recognises the social model of disability where it states "disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others."¹

The focus of the social model is not on the impairments but the barriers that disable individuals from full inclusion and participation.

Sligo DPO has requested that 'identity first' language be used in this paper to discuss disability. Thus, we use 'disabled people' rather than 'persons with disabilities'. 'Person first' language used in official Government documents has been retained when quoted. Additional guidance was supplied by the National Disability Authority's Advice paper on Disability Language and Terminology.² We acknowledge that the term disability is frequently used when the word impairment is intended. Impairment (sometimes referred to as disability) is very broad and covers a multitude of areas such as physical, sensory, mental and intellectual.

Housing affordability is a serious issue right across Ireland. However, given the increased risk of poverty experienced by disabled persons when compared to the general population (see the Cost of Disability research later in this paper), it is a particular concern. Data from the Central Statistics Office Survey on Income and Living Conditions (SILC) 2022 show the very high poverty rates for those unable to work due to long-standing health problems. This group have the highest risk of poverty in the State at 35.2%.³

There is an overall commitment from Government to ensuring that suitable housing is available.

Decongregation policies have seen disabled people make the move away from living in large institutions or congregated settings as dependants to living in their own homes within the community with access to any necessary supports. However, a failure to provide both supports and appropriately adapted homes has seen many young disabled people being housed in nursing homes. This places an emphasis on ensuring that suitable, affordable, accessible accommodation should be available within the county.

This short paper sets out the situation according to available data across the county and some of the policy initiatives that may assist in addressing the corresponding issues.

¹ UNCRPD Preamble paragraph (e) accessed at: <https://www.ohchr.org/en/instrumentsmechanisms/instruments/convention-rights-persons-disabilities> on 30th September 2023

² <https://nda.ie/publications/nda-advice-paper-on-disability-language-and-terminology> Accessed 5th April 2023

³ <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2022/poverty/> Accessed 5th April 2023

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

The UNCRPD was adopted on 13 December 2006 and ratified by Ireland in 2018. The Convention places an onus on the State, including the County Council to ensure that disabled people participate fully in the decisions that affect them. It realises the long standing call of the independent living movement worldwide, “Nothing about us, without us.”

Nothing About Us Without Us

Article 4.3 of the convention states that:

“In the development and implementation of legislation and policies to implement the present Convention, and in other decision making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations.”

Article 33 mandates that, “Civil society, in particular persons with disabilities and their representative organizations, shall be involved and participate fully in the monitoring process.” In 2018, General Comment No. 7 on the participation of persons with disabilities was issued.⁴

This General comment:

- defines the matters that require consultation broadly to “cover... the full range of legislative, administrative and other measures that may directly or indirectly impact the rights of persons with disabilities.”
- defines representative organisations and distinguishes “Organizations of persons with disabilities” from “organizations ‘for’ persons with disabilities, which provide services and/or advocate on behalf of persons with disabilities” and specifies that “States parties should give particular importance to the views of persons with disabilities, through their representative organizations, support the capacity and empowerment of such organizations and ensure that priority is given to ascertaining their views in decision-making processes.

Housing

Article 19 of the convention concerns the right of disabled people to living independently and being included in the community:

parties to the present Convention recognize 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.

⁴ UNCRPD, General Comment No. 7 (2018), paragraphs 21 – 23.

It is not enough simply to supply housing, the UNCRPD couples living independently with being included in the community. Without inclusion, decongregation risks being a very isolating experience. In 2021 ILMI reported that

The unmet need for a personal assistance service (PAS) has not been accurately measured. Significant investment is required of €4m in 2022, rising to €15m in 2032. It is estimated that an investment of €30m per year is needed to address the need of people not in receipt of any PAS service at present.⁵

Universal Design

Article 2 of the UNCRPD defines Universal Design as:

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.

The general obligations in Article 4 include:

(f) To undertake or promote research and development of universally designed goods, services, equipment and facilities, as defined in article 2 of the present Convention, which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities, to promote their availability and use, and to promote universal design in the development of standards and guidelines.

The Disability Act 2005 defined Universal Design 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. An environment (or any building, product, or service in that environment) should be designed to meet the needs of all people who wish to use it. This is not a special requirement, for the benefit of only a minority of the population. It is a fundamental condition of good design. If an environment is accessible, usable, convenient and a pleasure to use, everyone benefits. By considering the diverse needs and abilities of all throughout the design process, universal design creates products, services and environments that meet peoples' needs.⁶

ILMI and Inclusion Ireland note that “an accessible house is so much more than access to the building, it includes where your house is, being near accessible transport links, assistive technology and much more. Where you live is important, you need to be near transport shops and where the activities happen. Disabled people don't often have choice in this”.⁷

The National Disability Authority have created guidelines on what universal design should feature in Ireland. These guidelines were designed to stretch across various impairments including people with physical impairments, 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.⁸

⁵ ILMI & Inclusion Ireland Our Housing Rights: Tackling the Housing Crisis Disabled People Face 13 September 2021.

⁶ Disability Act 2005; <https://universaldesign.ie/what-is-universal-design/> Accessed 6th April 2023

⁷ ILMI & Inclusion Ireland Our Housing Rights: Tackling the Housing Crisis Disabled People Face 13 September 2021.

⁸ <https://universaldesign.ie/built-environment/housing/> Accessed 24th April 2023

Sligo County Council - Disability Inclusion & Access Strategy 2024-2027

Following the Sligo County Council Disability Inclusion and Access Strategy 2019-2022⁹ The second Strategy was launched on 16 May 2024 and will remain in place until the end of 2027. Sligo was the first County Council to recognise and reflect the social model of disability in their vision. This puts an onus on the Council to engage with the Disabled Persons' Organisation (DPO) to explore ways of removing barriers that restrict life choices for disabled people. This Strategy promises to “focus on effective social model informed inclusion and what needs to change and systematically transform to enable disabled people to achieve a barrier free pathway to the County’s resources.”

Asserting:

The term ‘disabled people’ is both positive and empowering, as it denotes the recognition of oppression by disabling barriers and affiliation to a collective movement, such as Sligo’s Disabled Peoples Organisation (DPO). Significantly, the term’s usage in this Strategic Plan also acknowledges something that can be changed and transformed by collective actions between disabled people as genuine partners and the County Council.¹⁰

The Vision and Mission of this strategy is:

[A]n inclusive society, where disabled people are facilitated to participate equally in all aspects of social life. The mission is to remove these barriers so that all in Sligo enjoy equal rights and opportunities to participate in the social, economic and cultural life of the county, with universal access to services and facilities.

Sligo Statistics

The latest figures available (Census 2022) show that 23 per cent of the population of Sligo county or 16,128 people (an increase from 9,577 people in Census 2016) ‘experience a long-lasting condition or difficulty to any extent’. The national rate is 21.5 per cent. Census 2022 asked people about their “long-lasting conditions or difficulties”.¹¹ These questions on long-lasting conditions and difficulties were revised in Census 2022. People were asked to indicate the extent to which they experienced any long-lasting conditions or difficulties they had. From the questions, it is possible to identify three categories reflecting the extent to which long-lasting conditions or difficulties were experienced.

- Long-lasting condition or difficulty experienced to any extent.
- Long-lasting condition or difficulty experienced to some extent.
- Long-lasting condition or difficulty experienced to a great extent.

Note also that the categories include difficulties experienced due to aging.

We can break those headline figures down further. Table 1 gives the age breakdown for the county.

⁹ https://www.sligococo.ie/corporateplan/DisabilityInclusionAccessStrategy_2019_2022.pdf Accessed 5th April 2023

¹⁰ New Strategy p. 52

¹¹ <https://www.cso.ie/en/releasesandpublications/ep/p-cpp4/census2022profile4-disabilityhealthandcarers/disability/> Accessed 16th October 2023

Table 1:**Age profile of those reporting a long-lasting condition or difficulty, Sligo, 2022.**

Age Group	
0 - 4	162
5 - 9	459
10 - 14	683
15 - 19	841
20 -24	830
25 - 29	622
30 - 34	623
35 - 39	748
40 - 44	893
45 - 49	956
50 -54	1,051
55 - 59	1,164
60 - 64	1,314
65 - 69	1,312
70 - 74	1,241
75 -79	1,227
80 - 84	928
85 and over	1,074

Source: CSO, Table 1.3 Population experiencing a long-lasting condition or difficulty to any extent by age group and administrative county, 2022

Table 2 breaks this down by Electoral Area and level of difficulty experienced.

Table 2: Number of Population with levels of Difficulty by Electoral Area, 2022

Electoral Area	any	to some extent	to great extent
Sligo - Strandhill	5,941	3,569	2,372
Sligo - Drumcliff	3,888	2,658	1,230
Ballymote – Tobercurry	6,299	4,015	2,284

Source: CSO, Census 2022, Table 1.7 Population experiencing a long-lasting condition or difficulty to any, some or a great extent by sex and Local Electoral Area, 2022.

Housing Affordability

Ireland in 2023 is still experiencing an ongoing crisis in housing that is impacting every county and a variety of backgrounds, However, some cohorts more than others are at risk. Research by the Economic and Social Research Institute¹² (ESRI) shows that disabled people have a higher risk of poverty before and after housing costs compared with non-disabled people. In fact, the before-housing-cost poverty rate of disabled people is higher than the rate after housing costs for non-disabled people.

Data from the CSO¹³ also indicates that more than two in five people who are unable to work due to a long-standing health problems (42.7 per cent) experienced enforced deprivation, compared to 17.1 per cent of the general population. Disabled people face then both a lack of suitable **and** affordable housing.

¹² <https://www.esri.ie/events/webinar-poverty-income-inequality-and-living-standards-in-ireland-2nd-annual-report>
Accessed 5th April 2023

¹³ <https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2022/enforceddeprivation/> Accessed 5th April 2023

Home Ownership

In Ireland in 2021, 40.7 per cent of the population were classified as owner occupiers with no mortgage; a further 31.3 per cent as owner occupiers with a mortgage; 10.1 per cent as tenants paying market rent; and 17.9 per cent as tenants paying non-market rent, which would include social housing and “social housing solutions” such as Housing Assistance Payment (HAP)¹⁴, Rental Accommodation Scheme (RAS)¹⁵ and Social Housing Current Expenditure Programme (SCHEP)¹⁶ scheme housing.

Access to credit is linked with income and ability to repay, mortgage credit especially so. Mortgage lending rules in Ireland were updated in 2015, setting limits on the amount of money that can be borrowed to buy residential property using two different metrics, Loan-to-Income (LTI) limit and a Loan-to-Value (LTV) limit. A Loan-to-Income limit caps the amount of money that can be borrowed to a maximum of 4 times the gross income for first-time-buyers and 3.5 times gross income for second/subsequent buyers. The Loan-to-Value limit requires a minimum deposit before a mortgage can be accessed. The size of this deposit depends on the category of buyer. First-time-buyers and second/subsequent buyers need to have a minimum deposit of 10 per cent. Whilst banks and other lenders can lend a certain amount above the limits, the proportion of lending allowed above the limits applies at the level of the borrower type so that 15 per cent of first-time-buyer lending can take place above the limits, 15 per cent of second and subsequent buyer lending can take place above the limits and 10 per cent of buy-to-let-buyer lending can take place above the limits.

If home-ownership is a policy goal, more needs to be done to ensure access to financial products such as mortgages and insurances for disabled people.

Given the low rates of participation in the labour force by disabled people, 40 per cent for those experiencing at least ‘one long lasting condition or difficulty’ compared with 61 per cent of the general population¹⁷ and the high rates of poverty as discussed above, accessing mortgage credit will be difficult to impossible ruling out home ownership for many. The same can be said of access to unsecured credit if the lending criteria is not met and ability to repay is in question.

Census 2022 reported on the number of ‘Adults with Long-Lasting Conditions and Difficulties’ still living with their parents and recorded over 228,000 people aged 25 years or over cohabiting with their parents. Almost one in four of these (51,942) reported experiencing at least one long-lasting condition or difficulty to any extent.¹⁸

¹⁴ Housing Assistance Payment is a form of social housing support provided by the local authority. The local authorities make a monthly rental payment on behalf of the tenant to the landlord and the HAP tenant pays a weekly rent to the local authority.

¹⁵ Under the Rental Accommodation Scheme, the local authority has a direct contract with the landlord to provide housing for people with a long-term housing need. The landlord agrees to provide housing for a specific amount of time, and this is covered in the contract with the local authority. The local authority pays the rent directly to the landlord. The tenant pays their weekly rent to the local authority.

¹⁶ SHCEP funds the current payments for properties leased by Local Authorities and Approved Housing Bodies.

¹⁷ <https://www.cso.ie/en/releasesandpublications/ep/p-cpp4/census2022profile4-disabilityhealthandcarers/disabilityandeverydayliving/> Table 2.4 accessed 18th October 2023

¹⁸ <https://www.cso.ie/en/releasesandpublications/ep/p-cpp4/census2022profile4-disabilityhealthandcarers/disability/> Table 1.8 Accessed 18th October 2023

Research from the Health Research Board¹⁹ shows that across the country, “77% of people with physical and sensory disabilities live with family members, although it is not clear whether this is by choice or due to lack of other options.”

The Simon Community define Hidden Homelessness²⁰ as “people sleeping in their cars, in squats, on the floors or sofas of family and friends, in unsafe accommodation or in homelessness projects” and by its very definition, numbers are difficult to come by. Simon Communities of Ireland in 2022 estimate that “as many as 290,000 people in Ireland are likely to be experiencing hidden homelessness, as friends or family are increasingly relied upon to provide accommodation for others”²¹ but disability was not recorded in the poll.

Census 2022 records 2,112,121 units of housing stock, an increase of 5 per cent from 2016. In general, home ownership rates fell as the total number of households living in rental accommodation increased.

In Sligo, 26,801 housing units were recorded. Table 3 breaks down these “permanent private households” by the nature of occupancy. Disability in these households is not recorded.

Table 3: Number of permanent private households by nature of occupancy, Sligo, 2022.

Owner occupied with loan or mortgage	6,674
Owner occupied with out a loan or mortgage	11,297
Rented from a private landlord	4,428
Rented from a local authority	2,367
Rented from a voluntary body	383
Occupied free of rent	542
Not stated	1,110

Source: CSO, Pxstat, FY035B

Social housing rented from the local authority comprises 8.8 per cent of the overall housing stock which is in line with the national average of 9 per cent. According to Housing Europe²², this is at odds with many of our European counterparts. Social Justice Ireland proposes that Government set a target that 20 per cent of all housing stock be social housing by 2030. This would equate to an additional 232,800 social housing units to be delivered in the next eight years. Housing for All commits to just 90,000 but lacks clarity over how 42,500 of those could be delivered within the plan.

Social Housing

Local authorities are tasked with determining housing needs under the dual headings of ‘basis of need’ and ‘specific accommodation requirements’. It is now possible for applicants to identify their housing needs as ‘wheelchair liveable’. However, the legislation currently only includes a requirement to have ‘wheelchair visitable’ housing. This means it is unclear as to whether the housing must be wheelchair liveable or wheelchair visitable. For example then, if a social housing tenant with a wheelchair livable house went next door to visit a neighbour or a family member in the same estate whose home was only wheelchair visitable, they would be able to get through a front door and access a room, but not use the bathroom or sleep over.

¹⁹ https://www.hrb.ie/fileadmin/2._Plugin_related_files/Publications/2020_publication-related_files/2020_HIE/NASS/NASS_2019_Supplementary_Physical_Sensory.pdf Accessed 19th October 2023

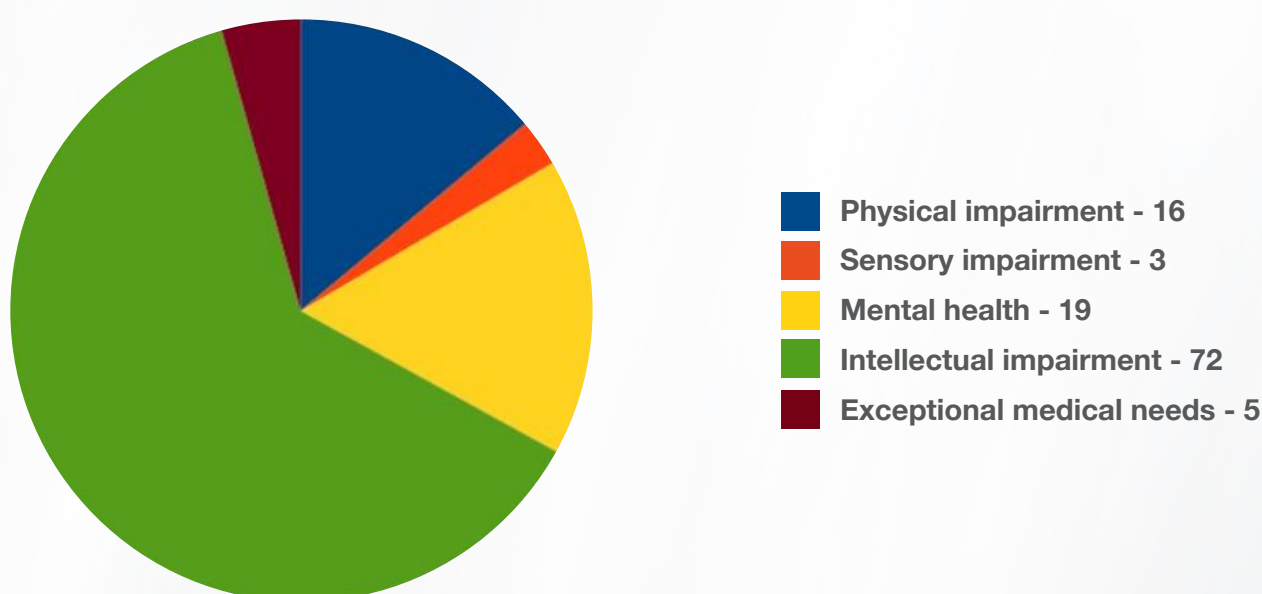
²⁰ <https://simoncommunity.org/homelessness/our-campaigns/the-hidden-homeless#:~:text=Hidden%20Homelessness%20refers%20to%20people,accommodation%20or%20in%20homelessness%20projects.> Accessed 19th October 2023

²¹ https://www.simon.ie/wp-content/uploads/2022/09/Simon-Communities-of-Ireland_Hidden-Homeless-Poll.pdf Accessed 19th October 2023 ²² <https://www.housingeurope.eu/resource-1540/the-state-of-housing-in-europe-in-2021> Accessed 19th October 2023

Safe, secure, accessible, affordable housing is integral to all our wellbeing. According to the Summary of Social Housing Needs Assessments in 2022 for Sligo²³, of the 517 households reported as having a need for social housing supports, 115 cited a household member as having an enduring physical, sensory, mental health or intellectual disability (see Chart 2). It should be noted that the Summary of Social Housing Needs, or social housing waiting lists as they are more commonly called, do not include HAP or RAS tenancies or people accommodated under the SCHEP scheme nor do they include households on the transfer list.

The Housing Assistance Payment (HAP) is the main way people waiting for social housing find a place to live. Under the HAP scheme, the local authority pays the full rent to the landlord and the tenant pays their contribution directly to the Local Authority. There is a cap on how much total rent the HAP scheme can cover. In Sligo, this amount is less than the rent that the market requires. Many people therefore are only declaring the maximum payable rent to the Council while making an additional monthly payment to the landlord to cover the shortfall. The lack of accessible housing in the private market means that disabled people are less likely to find suitable accommodation under this scheme.

Main need for Social Housing Supports by impairment, number, Sligo, 2021.



Source: Summary of Social Housing Assessments 2022, Housing Agency, 2023

According to Census 2016, only 19.3% of disabled people across the country lived 'alone, in private households'.

The National Housing Strategy for Disabled People (NHSFDP) (more on this below) does state that 10 per cent of new social housing developments of 10 or more are to be suitable for disabled people, with 50 per cent of those builds to be wheelchair liveable.

Sligo Local Authority Housing Policy requires a minimum of 15% of all units in developments of ten units or more constructed by the Local Authority are designed specifically for disabled people. In developments of less than ten units, consideration will be given to providing one unit in each.

Considering the low targets of social housing builds coupled with an ever lower delivery, even if this was met, it is unlikely to meet current or future demands.

²³ https://www.housingagency.ie/sites/default/files/2023-03/251070_08141c16-61e0-4686-9e72-02a57da5507d.pdf Accessed 20th April 2023

Disabled people have reported that Smart and Accessible Technologies, such as voice activated appliances and accessible cooking equipment, which are essential for people who are blind or visually impaired, are not often considered as part of necessary adaptations which can render the so-called ‘accessible’ housing not fit for purpose.²⁴

Location

The location of social housing estates in general needs to be well serviced with easy access to transport links and local resources, even more so for disabled tenants. The above mentioned lack of social housing options impacts across society, impacting on life choices in education, employment and family formation.

The Sligo social housing application process requires applicants to identify up to three areas they wish to live in. However, many disabled people have location requirements that are not connected to areas but to specific needs such as access to public transport and community living.²⁵ A disabled applicant may be willing to accept a much broader range of geographical locations as long as the house has good access to transport, shops and local services.

Accessible Application Process

Accessibility under the UNCRPD included access to information. The system of applying for social housing can be confusing and the paperwork involved is not accessible to many disabled people. The process requires a determination that the household is both “eligible for and in need of” social housing, which is determined by the Local Authority and the process can be unwieldy for anyone with literacy or numeracy difficulties or additional needs. Proof of housing need due to disability can be more onerous as the need for recent accurate paperwork can prove difficult for some. Some people with hidden disabilities who have approached the housing office in County Hall have been referred to Focus Ireland for assistance with making a housing application. The housing office needs to work with the County Council Inclusion Officer to streamline application processes for disabled people and Housing Office staff need to take disability equality training.

Private Rental

A recent report from Alone and Threshold entitled, ‘Double Deficit, Older and Ageing Persons in the Irish Private Rental Sector’²⁶ does not specifically address housing for disabled people but as many people will first experience disability with as a result of ageing, the Report has some insights from the private rental sector.

The report examined vulnerability and notes that “vulnerabilities related to insecure accommodation were exacerbated by vulnerabilities associated with, for example, older age, illness and infirmity, family composition and low income. One respondent to their survey replied that “At our age, with me showing up with a walking stick or a wheelchair, who’ll want to take us? That’s the hidden side of having a disability.”

They found that older people were at a disadvantage in the private rental sector and that “such disadvantages are compounded in situations where illness or disability apply, or where significant care needs exist and/or where housing adaptation may be required. They are equally magnified in situations where an older person lives on low income or has significant financial outgoings, and/or is reliant on housing subsidies from the State to meet their cost of rent.

²⁴ ILMI Our Housing Rights: Tackling the Housing Crisis Disabled People Face 13 September 2021.

²⁵ Ibid.

²⁶ <https://alone.ie/wp-content/uploads/2023/05/Threshold-Alone-Report-highres-web.pdf> Accessed 19th October 2023

The precarious economic nature of being an older renter on a fixed income is worsened in this period of growing inflation.”

The Integrated Care Team, Connolly Hospital report that “It’s very hard to find positives in relation to private rental and older people. There’s very little selection of properties. The ideal would be a ground floor flat with two bedrooms. A lot of the people I work with can’t manage stairs and can’t put in stair rails because of private renting. The Housing Adaptation grant is not being taken up by landlords. Some are positive and don’t mind and have given permission for stair rails but nothing more. There is no freedom to adapt a home that isn’t your own, leaving older people feeling insecure. Most are hesitant to approach a landlord. There’s a fear of drawing attention, rent might be put up or you might be given notice or just causing hassle. This prevents older people from doing what they need do to their environment to make it easier for them to live in.”

Accordingly, Recommendation 5 from the Report is to:

“Continue to invest in the Housing Adaptation Grant Scheme and provide incentives for private landlords to access. If older people are to live independently and securely in the PRS, while grappling with health and ageing concerns, it is essential that the PRS increases its engagement with the Housing Adaptation Grant. This study proposes, as part of ongoing and increased investment in the Housing Adaptation Scheme, the need for the State to offer incentives to private landlords to apply for and access the grant. In late 2022, a new tax deduction for small-scale landlords who undertake retrofitting works while the tenant remains in situ was introduced; a similar incentive could be offered to those landlords who access the Housing Adaptation Grant.”

Student Housing

Neither the Atlantic Technological University (ATU) website²⁷ nor the ATU Students Union (ATUSU) website²⁸ appear to make reference to accommodation for disabled students. The University and Student Union have informed us that they do not have any provision on this subject as the companies providing the accommodation to students are all privately owned and operated. However, each one would provide accommodation options for disabled students.

The Students’ Union recommends seven main providers.

- Clarion Village Student Accommodation,
- Gateway Apartments, operated by Lakewood Letting,
- Gateway Apartments, operated by Winters,
- The Grove Student Accommodation,
- Lila Lake Isle Luxury Apartments,
- Yeats Student Village,
- Unirooms.

Cost of Disability

The Cost of Disability in Ireland – Final Report²⁹ was published by the Department of Social Protection in 2022. This detail of this study, which commenced in 2019, is very welcome and should inform policy on a cost of disability payment in the near term.

²⁷ <https://www.itsligo.ie/cao/accommodation/> Accessed 18th October 2023

²⁸ <https://atussu.ie/student-accommodation/> Accessed 18th October 2023

²⁹ <https://assets.gov.ie/206636/f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf> Accessed 20th April 2023

Overall, although those not at work due to illness or impairment only account for a small proportion of those in poverty, their experience of poverty is high. There is an on-going need for targeted policies to assist them. These include job creation, retraining and further increases in social welfare supports including the introduction of a cost of disability payment. The main findings of the Report are that there are significant additional costs faced by disabled people which are currently not met by existing programmes or by social welfare payments. The analysis shows that the actual costs faced by individuals classified as having “severe disabilities” range from €9,600 - €12,300 on average per annum and for those classified as having “limited disabilities” from €8,700 - €10,000 per annum. In addition to the additional costs incurred by disabled people, there are unmet costs faced by many as they are not currently affordable.

Disabled people face enormous challenges in living independently and face a high risk of poverty and social exclusion. Measures to address the additional costs of disability should be based on a multifaceted approach involving increased cash payments, enhanced access to service provision and specific targeted grant programmes. Disabled people experience significant challenges in accessing employment. A high priority should be given to facilitating an increase in employment opportunities for disabled people. With employment, comes a move away from a sole reliance on a low rate of social welfare for income.

The analysis has also shown that extra costs of disability are incurred across a wide range of areas and can include expenditure such as medicines, care and assistance, transport and mobility, costs of social engagement, home adaptation, and day-to-day expenses on items like food and heating

the home. The extent to which additional costs are incurred depends on the nature of an individual’s impairment. It is important to note that these estimates, even those provided at a more granular level of individual impairments, are average across populations of individuals with potentially different levels of need, different circumstances, and different costs. The survey research has illustrated that within these averages there are likely individuals who face considerably higher costs due to their disability than those estimated below. This suggests that there is a need for the state to provide supports to disabled people via a range of supports including additional income, targeted grants, and better services or supports free of charge.

Relevant Policies:

Disability Capacity Review to 2032 - A Review of Social Care Demand and Capacity Requirements to 2032

This report³⁰ quantifies and costs future need for disability support services, in the light of expected population change, and the needs which are yet to be met and commits to more supported housing in the community. An Action Plan is being developed to map out in more detail how to make progress over the period to 2025.

Housing For All

Housing For All³¹, the Government’s Housing and Homelessness Strategy, makes a commitment to increase housing supports for disabled persons, to increase the provision of housing for disabled persons and the publication of the National Housing Strategy for Disabled People 2022 – 2027 which was published in early 2022.

³⁰ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/154164/bcf6b966-4834-4cba-ad9a-53efc2ac3796.pdf#page=null> Accessed 24th April 2023

³¹ <https://assets.gov.ie/197237/29edec3e-6664-4e62-86b2-af2e77f2f609.pdf> Accessed 24th April 2023

National Housing Strategy for Disabled People 2022 – 2027

The National Housing Strategy for Disabled People (NHSDP) 2022 – 2027³² leads on from the previous National Housing Strategy for People with a Disability (2011–2016 - extended to 2021).

The vision for the Strategy is “To facilitate disabled people to live independently with the appropriate choices and control over where, how and with whom they live, promoting their inclusion in the community and to further enable equal access for disabled people to housing with integrated support services”. Importantly, this is a cross departmental initiative, the Department of Housing, Local Government and Heritage, the Department of Health and the Department of Children, Equality, Disability, Integration and Youth all working together to deliver on this.

There are 6 themes, each with a list of outcomes.

Theme 1 – Accessible Housing and Communities

- There is an increase in the provision of accessible housing for disabled people by the setting of local, need-related targets for all social housing providers using a universal design approach, as appropriate.
- Disabled people are supported to avail of housing opportunities that arise through the increase in supports, both formal and informal.
- Communities and housing developments are more accessible for disabled people.
- Local authorities strategically plan for the housing needs of disabled people in their administrative area.
- Provision of housing and related supports, that is in line with UNCRPD principles, is supported through collaboration between the HSE and local authorities at both national and local level, and appropriate funding.

Theme 2 – Interagency Collaboration and the Provision of Supports

- Disabled people have a clear pathway to accessing housing and support services.
- A regulatory landscape/framework that best supports the delivery of housing for disabled people. Local authorities and the HSE work and collaborate efficiently, improving access to housing for disabled people.
- Local authorities, Approved Housing Bodies, the HSE and Service Providers work and collaborate efficiently, improving access to housing for disabled people, provision of community based residential care for disabled people, and working towards ending provision of residential care in institutional or congregated settings.
- The Assessment and Allocation Guidelines are embedded in the policies and procedures of the local authorities and the HSE.
- Improved coordination and increase of capital and revenue funding for housing and related supports.

Theme 3 – Affordability of Housing

- Disabled people have access to affordable housing schemes.
- Disabled people can afford to purchase a home or rent at an affordable price.
- Grant Schemes funded by the various Government departments are fit for purpose with
- clarity on areas of responsibility including the use of technology.

³² <https://www.gov.ie/pdf/?file=https://assets.gov.ie/213153/a6abe06d-5651-4313-b75c-46571b2378c2.pdf#page=null> Accessed 24th April 2023

Theme 4 – Communication and Access to Information

- A proactive and consistent approach is taken by agencies in the provision of information which will be coordinated by The Housing Agency.
- There is an increase in the communication between State Agencies and disabled people regarding their housing opportunities both from a housing and support perspective.
- Support people to have the time and opportunity to engage with services and local authorities that they need. Information is provided in an accessible format in the one location.
- Better sharing of data to produce more collated data.

(This last point is very important in light of how little data is available on the housing situation of disabled people across the country).

Theme 5 - Knowledge, Capacity, and Expertise

- Local authorities, the HSE and Approved Housing Bodies have the knowledge base, expertise and capacity to provide services and relevant information to disabled people.
- Knowledge and expertise regarding disability issues are integrated into all relevant organisations.
- There is an understanding of each other's roles among the various stakeholders that results in an improved service to disabled people.
- Local authority and Approved Housing Body staff implement the changes required to meet their obligations under the Assisted Decision-Making Act 2015.

Theme 6 – Strategy Alignment

- The Strategy is underpinned by Housing for All and the new Local Delivery Action Plans established under its framework.
- The Government strategies such as Sharing the Vision, A Time to Move on from Congregated Settings complement and feed into the new National Housing Strategy for Disabled People and associated Implementation Plan.
- The Implementation Plan for this Strategy will take cognisance of the Disability Capacity Review to 2032, and 'Wasted Lives'.
- There is an alignment of strategies promoting the rights of disabled people so housing provision is not considered in a silo.

According to research undertaken by PublicPolicy.ie³³, the document does not provide much 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. 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. 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 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.”

³³ <https://publicpolicy.ie/housing/reviewing-disabled-housing-policies-in-ireland-are-these-policies-fit-for-purpose/>
Accessed 24th April 2023

A Report from the Disability Federation of Ireland, 'The Right Home: the Housing Needs of People With Disabilities', notes that there is "a considerable gap between the strategy's policy aspirations and the reality of its implementation. While acknowledging the severe housing crisis that Ireland has been experiencing.....the disproportionate extent to which people with disabilities are failed by the system, and the range of challenges that they continue to experience in seeking to find a suitable home to live in".³⁴

At the time of writing, the Implementation Plan was still in preparation.

The National Housing Strategy for People with Disabilities 2022-2027

This builds on the 2016-2019 strategy and commits to "disabled people having choice and control over their living arrangements. One of the actions set out in the initial Implementation Strategy was the establishment of a Housing and Disability Steering Group in each Local Authority area". The purpose of these groups is to deliver the National Housing Strategy for People with Disabilities at local level with the guidance and support of the national structures through the Housing Agency.

Sligo County Council have such a steering group with council officials, HSE staff, approved housing bodies and the disability sector all represented. There is a commitment to ensuring that support at local inter-agency level ties in with national plans ensuring that those living with a disability are supported to live an independent life in a home of their choosing in their community and that any new homes built implement universal design standards which means that they can be adapted to tenant's changing needs. There is also a Disability Consultative Committee, a subcommittee of the Housing and Corporate SPC.

Housing Adaptation Grants for Older People and People with a Disability Schemes

This grant is available through the local authority to help with the necessary work of adapting an existing property to make it suitable for a tenant with a disability. This would include access ramps, stair-lifts, ensuring accessible facilities such as showers and toilets, extensions and any other works deemed 'reasonably necessary'. Grants are also available under the Mobility Aids Housing Grant Scheme for more basic works such as grab rails and accessible showers up to a maximum of €6,000 and again is applied for through the local authority. According to the Disability Inclusion & Access Strategy, this grant scheme is over subscribed, demonstrating both the level of need and the inability to meet it. Grants however are only available per household, not per person. A household with more than one disabled person living there (likely given the statistic below about carers aged over 80) will have to decide which need is greatest or pay for works needed from their own budget. This does not factor in changes that may be required to a property across the life cycle due to ageing, family formation or shifting needs according to impairment.

The grant will cover making the home more accessible by:

- Adding ramps or other ways to access your home
- Extending your home to create more space, for example, adding a downstairs bedroom
- Adding accessible bathroom facilities, such as an accessible shower or a ground-floor bathroom or toilet
- Installing a stair lift
- Installing grab rails
- Installing a fixed track hoist. (This is a ceiling or wall-mounted track with a sling attached to it, which means you can be mechanically lifted and moved to different places along the track).

³⁴ https://www.disability-federation.ie/assets/files/pdf/the_right_home_the_housing_needs_of_people_with_disabilities.pdf Accessed 24th April 2023

The grant does not cover added VAT. An application can be made to Revenue for a VAT refund for any appliances needed and the cost of installing them.

The maximum grant is €30,000 or 95 per cent of the cost of the work (whichever one is less). The amount of money depends on household income for the previous tax year.

If household income is less than €30,000, it may be possible to get 95 per cent of the cost of the works up to the maximum grant amount of €30,000. If the property is less than 12 months old, the grant will not be more than €14,500.

As household income increases, the percentage of the costs paid by the grant gradually reduce from 95 per cent to 30 per cent. For household incomes of between €50,001 and €60,000, these will qualify for 30 per cent of the costs.

However, you may not get the maximum grant, even if you qualify for it. This is because the grant is paid by your local authority and depends on what funding they have available. They will decide whether they can pay you the full grant, or a percentage of the grant.

You will not get a grant if your gross annual household income is over €60,000.

Again, as stated above, households with a disabled person living on them tend to have lower incomes and be more at risk over poverty meaning that they are not likely to have private funds to cover necessary costs if they cannot access grants. Disabled people report that the means test is too harsh and that often the amount of the grant is inadequate to cover the required adaptations.³⁵

Smart or accessible technologies such as accessible cooking equipment and voice activated appliances, which are essential for blind and visually impaired people, are not usually factored in as an accessibility requirement.³⁶

Housing For All commits to an increase in funding for the scheme.

To apply for the grant, there is an application form that can be downloaded from assets.gov.ie³⁷ or a hard copy can be requested directly from the local authority. There is a section of this form that must be completed and signed by a doctor. The form will ask for details of the work required and estimated costs.

The completed form is returned to the local authority along with any documents that are needed, such as:

- Proof of household income for the previous tax year
- Proof that the Local Property Tax (LPT) for the home is in order
- A letter from the landlord giving you permission to get the work done, if you are renting
- An occupational therapist's (OT) report if you are using the grant to add an extension, get a stair lift or make a big change to how a room is being used.
- The local authority can arrange for the OT assessment, or you can employ an OT yourself and get up to €250 of the cost from the local authority as part of the grant. You can search for an OT on the website of the Association of Occupational Therapists Ireland.

The application form gives full details of the documents you will need as proof.

³⁵ ILMI & Inclusion Ireland Our Housing Rights: Tackling the Housing Crisis Disabled People Face 13 September 2021.

³⁶ Ibid.

³⁷ <https://assets.gov.ie/119595/fb68af61-2429-414e-8f61-95ddc380f8ec.pdf> Accessed 19th October 2023

Time to Move on

Sligo County Council commits to the continuing implementation of the 'Time to Move On' national policy. This policy gives disabled people who currently live in institutions the choice and control over where and with whom they live, within the community. The aim is to close all congregated settings over the long term. Research from Inclusion Ireland reports “over 4000 disabled people living in institutions such as people under 65 years of age living in nursing homes and people living in a congregated setting like a residential service. Many disabled people are living in the family home with an ageing carer. At least 400 carers are over the age of 80.”³⁸

Given the lack of affordable and accessible housing, this commitment may prove a challenge.

Sligo Strategic Plan for Housing People with a Disability (2021-2025)

This Plan was prepared before there was a Disabled Person's Organisation (DPO) in Sligo. At the time it was prepared, in order to comply with the UNCRPD requirement to consult and actively involve disabled people, the plan suggested seeking testimonials from service users and to consider using visual story-telling. The Sligo Disabled Persons' Organisation now has a seat on the Housing and Disability Steering Group (HDSG).

The vision of this strategic plan for the county “is to facilitate access to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which promotes equality of opportunity, individual choice and independent living for people with a disability.”³⁹ The plan commits to relevant policy and legislation, including the UN Declaration of Human Rights and the European Convention of Human Rights. The report notes that for Sligo, based on 2021 social housing waiting list, “there is an overwhelming need for 1 bedroom disability properties as expressed by 78% of the households whose basis of need is disability”. The report notes that the “de-congregation of Cloonamahon and Cregg House was the main aim of the Learning Disability and Autism Service of the HSE in the previous Sligo Housing & Disability Strategic Plan 2016-19 and thatthere has been much progress, ...(with) individuals still residing in congregated settings tend to be people with ageing/mobility/medical or challenging needs. There is a need for purpose built bungalow style accommodation which also has capacity for sleep-over staff.” Fourteen homes within the community are due to be bought or purpose built between 2022 and 2024 to facilitate current residents. No other congregated settings are mentioned in the Plan. The plan acknowledges that “Local Authorities can only deal with Housing Applicants and households already identified to them through the Social Housing Support Application Process. However, it is accepted that there will always be an emerging need in this area.” This understanding is vital if adequate housing is to be planned for. Sligo Council would encourage adult dependants living at home with parents “to apply for social housing supports in a timely manner”.

In the detail, the plan commits to raising awareness of the plan and making the forums accessible for disabled people, ensuring the inclusion of people with lived experience, periodic review every 12 months, training relevant staff in Disability Awareness and Accessible Design, auditing approved housing body properties for accessibility adaptations, connecting the dots between disabled people on the housing list and HSE supports, incorporating universal design in all housing developments.

³⁸ <https://inclusionireland.ie/wp-content/uploads/2021/09/Report.-Our-Housing-Rights-2021.pdf> Accessed 24th April 2023

³⁹ <https://www.slilococo.ie/housing/PlansandStrategies/StrategicPlan-HousingPeoplewithaDisability/HD%20Strategy%20Plan%202021-2025.pdf>

Conclusion

Disabled people have a right to live independently and be included in the community. However, currently a high proportion of disabled people are living at home with their parents or in nursing homes due to a lack of housing that is both accessible and affordable. Local policy reflects that there is a lack of suitable one-bedroom accommodation. However, it should be noted that many disabled people would need two-bedroom accommodation to accommodate PAs or family, who might need to sleep over. The local strategy would encourage disabled people on housing lists to access supports available from the HSE. However, the level of that support is also inadequate to meet the demand. The current commitment to 15% of social housing being accessible is too low and should be raised to 20% with half of that being wheelchair liveable. Planning mechanisms should require more universally designed and wheelchair liveable private housing. In both cases, smart technologies should be part of the design. Disabled people need better access to financial services to purchase their own home. The housing adaption grants need to be promoted to landlords to increase the supply of accessible housing on the private market. Information and form filling for social housing and adaptation grants needs to be made more accessible for disabled people. Means testing thresholds for adaptation grants and the total funds available for each application needs to rise and smart technologies need to be included. The Council should continue to engage with DPOs in the planning, implementing and monitoring of the provision of housing for disabled people and in accordance with the UNCRPD, the voices of disabled people and DPOs should be prioritised over other stakeholders, including the charities that would purport to speak for disabled people.

