

Inter-Departmental Review of Housing Adaptations Services

# A Summary of Consultation Responses

November 2013



**Northern Ireland  
Executive**

[www.northernireland.gov.uk](http://www.northernireland.gov.uk)

Consultation supported by the  
Department for Social Development and  
Department of Health, Social Services and Public Safety

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## Introduction

This consultation was undertaken following the review of the current system of approval, resources, and delivery of housing adaptations in Northern Ireland on a cross tenure basis. The review's key aims were to ensure that value for money in terms of resources and service delivery were being achieved and equality of provision across the Health and Social Care Trusts and other housing providers.

The review considered the following issues:

- Existing published evidence;
- The key legislative and policy drivers on housing adaptations services considering departmental/agency interfaces;
- The impact of investment in housing adaptations services on the health and well-being of service users and how this can help to secure savings elsewhere;
- The current and likely future demand for the housing adaptations services;
- Funding models in other parts of the UK;
- The use of recyclable resources;
- Governance arrangements and current performance measures in assessment and delivery;
- Interagency co-ordination of complex case work; and
- The range of options/solutions which can be utilised to meet assessed needs.

## Consultation Methodology

Disability Action facilitated three consultation events in accessible venues in Derry/Londonderry, Belfast, and Omagh. Accessible transport to the venues and technology such as induction loops enabled full participation and ensured inclusiveness on a pan-disability basis.

### Attendance at Consultation Events

Dates	Locations	Number of Attendees
1st May 2013	Belfast	46
2nd May 2013	Derry/Londonderry	30
7th May 2013	Omagh	38
	Total	114

In addition, copies of the consultation report were issued to a range of other organisations/individuals (600 in total) and responses were received by email, post, and through a Facebook survey of parents with disabled children. Arrangements for alternative formats were put in place, including an easy-read version.

## Questionnaire

The consultation questionnaire was designed to capture information under seven recommendation headings with nine questions which covered:

1. Closer working between statutory bodies;
2. Improving partnerships;
3. The provision of advice and guidance;
4. Improving Joint Working;
5. Improving information on existing resources;
6. Procurement/Recycling;
7. Design Standards;
8. Equality; and
9. Rural Proofing.

## Profile of Consultation Responses

In addition to the three consultation events, there were 60 organisational and individual responses and these were received from a wide cross section of stakeholders. The disability sector accounted for 40% of the responses.

## General Feedback on the Interdepartmental Review

A summary of the three cross sector consultations has been compiled by Disability Action which is available at <http://www.disabilityaction.org>. In general, the emerging themes and responses reinforced the themes and feedback received from organizations and individuals.

A range of respondents welcomed the consultation and the documents overall for their quality and inclusiveness. For example:

*“The Commissioner welcomes Ministerial leadership on aligning the activities of both Departments to improve policy and service delivery”*

**Commissioner for Older People**

*“The Commission broadly welcomes both the purpose and scope of the Review and agrees in general terms with the social and economic analysis therein which provides a strong evidence base for the continuing and growing need for the housing adaptations services”*

**Equality Commission Northern Ireland**

*“The evidence document reads with such clarity and force. It is so orderly, systematic and thorough you are swept on a tide of well-documented reason to seeing how valuable the service is and how it makes sense to have better co-ordination at all levels”.*

**Frances Heywood**

With regard to other feedback received, one respondent identified some areas which may need further consideration:

*“The present strategic context and direction of travel has been covered in the main Evidence Base Report. Affordability is identified as a concern governing the achievement of any strategic outcomes, but we feel it is touched on too lightly. Issues of equity and equality need further exploration. There are other contributors to the process such as architects and contractors which are not explored in their view, but we believe have a crucial place in the overall process”*

**Shelter NI**

## **Consultation responses on key strategic themes**

### **1. JOINT DEVELOPMENT OF THE POLICY AND GOVERNANCE FRAMEWORK**

#### **Recommendation 1 – Closer Working between statutory bodies**

Many respondents highlighted the value and importance of housing adaptations services in promoting independent living and in supporting a range of government policies such as the Office of First Minister and Deputy First Minister (OFMDFM) Strategy to improve the lives of disabled people and Department of Health, Social Services and Public Safety (DHSSPS) “Transforming Your Care” and “Who Cares?” strategies.

There was strong cross sector support for the development of a DSD/DHSSPS Memorandum of Understanding (MOU) and departmental guidance for housing adaptations services:

*“The memo of understanding should drive:*

- Shared information*
- Shared IT Strategy on Interfaces between the two organisations with files managed in a single system*
- A more co-ordinated approach for the utilization of resources and transfer of resources across organisations*
- Procurement across all tenures”*

**Belfast Health and Social Care Trust**

Health and Social Care Trusts (HSCT’s) advised that while in many cases there were already examples of joint working between HSCTs’ Occupational Therapy services and housing providers in the delivery of adaptations for disabled people, these interfaces could be further developed and enhanced.

The MOU would assist in formalising arrangements and set out a clear strategic direction for adaptation services provision into the future. Along with the development of a framework and policy guidance to support the MOU, there should be an agreed joint action plan to implement the changes required.

The overall consensus from those remaining organisations who responded to the review were supportive of a Memorandum of Understanding between the two departments and agreed that there was a need for a clear framework and policy guidance.

Responses received from political groups were supportive of closer co-operation and a joined up approach by the government departments to the provision of housing adaptations services.

Respondents raised concerns regarding the future organisation of housing adaptations services in light of major organisational changes in both the Housing and Health & Social Care sectors.

*“Members expressed concern at the uncertainty for the future provision of this service and the Health Trusts proposals. Members have been alarmed at the recent announcement to close several nursing/residential homes and are concerned at the reduction in care services throughout Northern Ireland”*

**Housing Council**

With reference to reviewing housing guidance on the Disability Discrimination Act, the Equality Commission stated that their proposals for legislative reform of disability equality legislation are currently under consideration by the Northern Ireland Executive.

## **Consultation Question 1**

***Some minor social housing adaptations do not require prior referral to Health Trust Occupational Therapy Services. Are you aware of this?***

Although this system has been in place since 2002, the overall level of awareness was mixed. Of the 62% of respondents who were aware that some minor social housing adaptations did not require prior referral to Health and Social Care Trust Occupational Therapy Services, it is perhaps unsurprising that the majority of these respondents were within professional organisations. Within HSC Trusts awareness was high among Occupational Therapists in the community but lower amongst Occupational Therapists in the acute sector and other health and social care colleagues.

Some respondents did not know about the specific minor works listed. 4% were unaware of the existence of any such list. A significant number (30%) made no comment to this question. Further investigation indicated that when the easy read response document was streamlined, Question 1 of the consultation document was omitted and this has led to a high no comment response rate to this particular question i.e. 25%.

There was also concern that all social housing providers may not have adopted a common list of minor adaptations which do not require a HSC Trust assessment. Some respondents suggested that there could be more sensory adaptations included in the minor works list.

The consensus of opinion from those who responded was that wider publicity was required as they proffered the general public and people with disabilities were unaware that such a list existed.

***If not, what would you suggest could better publicise this fact?***

A range of suggestions included:

- Training of public representatives;
- Community planning;
- A comprehensive handbook/flier which is regularly updated;
- Wider publicity through church and community groups;
- Fliers in GP surgeries, commercial advertising, leaflet drops, inclusion in tenants' manuals;
- Inclusion on all Housing, Health and Social Care websites;
- Referrals from Advice NI and Citizens Advice Bureau;
- A free central telephone number/person should be available where people could get advice on items which are classed as minor adaptations;
- Update training for relevant HSC and housing staff particularly in Housing Associations;
- Update training for disability and older peoples advice services including carer organisations and disability benefit offices; and
- Targeted information for people in isolated rural areas.

Responses identified the need to harmonise and consistently apply the lists of minor adaptations for all social housing which did not require referral to HSC Trusts for assessment.

*“Information on the adaptations available, and which of those do or do not require referral, is available on line on the NIHE website and NI Direct, and is easily found using internet search engines. Whilst this is extremely helpful, not everyone in Northern Ireland has access to, or uses/is able to use the internet, and so it is essential that this information is available through other means. The provision of an enquiry line is noted and it is welcome that this is provided at a standard call charge rate”*

**NILGA**

## Recommendation 2- Improving partnerships

Some organisations accepted that relevant statutory bodies should sign up to the values and principles of the 2011 Concordat between the Voluntary and Community Sector and the Northern Ireland Government which would help to ensure meaningful representation<sup>1</sup>.

### Consultation Question 2

***How can representation and engagement from disabled people be further improved within housing adaptations decision-making structures?***

*“We note positively the inclusion in the consultation workshops of service users from both the social and private housing sectors. Furthermore, we acknowledge the extent of the engagement with older and disabled people undertaken by Disability Action in partnership with the Northern Ireland Housing Executive as part of the research involved in this Review”*

***Equality Commission***

96% responded to this question giving their views on how representation could be improved. 4% did not comment. The overarching view was one of full support for service user involvement and that a representative cross section of people with disabilities and their carers are involved at all levels of the decision-making process.

The current initiatives which support the representation and engagement of disabled people in the planning, delivery, and evaluation of housing adaptations services in the NIHE social housing sector were widely commended. There was significant support for the on-going work of the Disability Design Housing Panel, which is an expert panel of services users, community occupational therapists, designers, and housing officers, who evaluate and advise on design standards and fixtures for disabled people.

A number of participants wanted to see models of good practice for user engagement extended from the NIHE public sector to housing associations, the private sector, and HSC Trusts.

It may be useful to develop existing focus groups within HSCT’s to consider housing for disabled people and their carers.

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<sup>1</sup> This Concordat is an agreement between Government and the Voluntary and Community Sector which outlines the key values and principles; and establishes a set of shared commitments on how government and the Voluntary and Community Sector can work together to better service the people of Northern Ireland. Signatories to this concordat share the belief that these partnership arrangements will assist citizens and communities to empower themselves, make a significant contribution to democratic governance, bring people and politicians closer together, provide a better understanding and opportunities to influence decision making and resource allocation.

More information on the concordat is available at: <http://www.dsdni.gov.uk/consultation-concordat-for-relationships-between-govt-vc-sector.pdf>

*At an operational level, “Individual service users’ feedback should inform and shape the development of any new adaptations framework through the development of a standard procedure to evaluate and record individual service user journeys capturing both their experiences and satisfaction levels. Furthermore any sign off of work should not be considered until any outstanding issues or concerns of the service user have been addressed to a reasonable standard. Clear protocol should be established.”*

**Equality Commission**

*“Operational issues could be addressed by the establishment of an adaptations practitioners group for all housing tenures with participation from housing, Health and Social Care Trusts (HSCT) and representatives groups for disabled people”*

**NIFHA**

This group could formally review the Design Toolkit on an annual basis drawing from experiences and testimonies gathered over the 12 months to ensure continuous learning and process improvement.

It was suggested that more effort is required to ensure the engagement of people with learning disabilities and parents of disabled children generally, some of whom felt they were not equal participants in decision-making processes and they did not have appropriate access to policymakers.

*“There is little opportunity in NI for parents of disabled children to influence policy makers – and by that we mean speaking directly to policymakers without anyone interpreting, advocating or speaking on our behalf”*

**Parents of Disabled Children NI**

Such initiatives will require skilled facilitation, staff training, and support through the use of assistive technologies.

Respondents also stated that community planning and the Patient and Client Council may also provide a valuable future role to support user involvement.

### Recommendation 3 – The provision of advice and guidance

The DUP suggested that *“to enable elected representatives to fully supply accurate information to constituents, the provision of a one off handbook which could be updated regularly would be advantageous.”*

**DUP**

#### Consultation Question 3

##### ***Do you consider that a Housing Options Service would be helpful?***

There was widespread support for the development of a housing options service. 92% agreed that a Housing Options Service would be useful, 2% did not, 1% had no comment and 7% were unsure of the most effective way of doing this.

Many respondents stated that it should address the housing needs of disabled children in transition, and people with learning disabilities as well as those of older people.

*“Shelter NI has recognised the need for such a service for some time as many private homeowners who for one reason or another are unable to complete an adaptation through the HSC T and Grants system are simply left with no alternative options and end up falling into unmet need”*

**Shelter NI.**

*“SDLP welcomes the proposal that a potential Housing Options service may be piloted by the two Departments. This will undoubtedly assist those who need particular assistance in their properties but are uncertain of what options exist”*

**SDLP**

The Commissioner for Older People suggested that there *“is a need to balance equality of provision against urgency and/or severity of need and timelessness of provision.”* The gap in the provision of housing adaptations in the private sector needs to be addressed. It was suggested this was due to differences in the provision of information and support, service user involvement and the funding of adaptations, cross tenure.

*“This gap was likely to have an adverse negative impact on older people given that 74.5% of older people are owner-occupiers and are more likely than young people to have a disability. While older people can utilise the services of FOLD/Gable to help complete their DFG applications, there was a lack of awareness of the availability of these services.*

*There is a distinct difference between the public and private sector in the provision of information and support to those older people assessed as requiring adaptations by Occupational Therapists (OT). Within the social housing sector, Housing Support Officers (HSO) and Area Welfare Officers play a key role in dealing with major and complex adaptations required by NIHE tenants. The role of these officers is to liaise with individuals as well as external agencies to examine and appraise options for adaptations. Housing associations have an appointed member of staff to oversee all adaptations for their tenants and to provide a “contact point” for enquiries.*

*In contrast, there is no specialist post created to liaise with Occupational Therapy Services in the private sector. Older people who are owner occupiers must complete the process of applying for a Disabled Facilities Grant and, if required, find additional sources of finance, without the support that exists in the public sector. This is a daunting task which may well dissuade an older person from applying for assistance. Whilst, older people can utilise the services of FOLD or Gable to help complete their DFG application, there is a lack of awareness of these services”*

**COPNI**

In many cases it was considered that a housing options service pilot should be set up to assist all those with disabilities, not exclusively for older people, to make choices about their housing.

### **Potential Models of Service delivery**

Some respondents felt that there was no need to establish another separate agency to provide the service and that disabled people often had to work with so many professionals as it was. Existing service providers such as occupational therapists, social workers and housing providers could be further trained to ensure that a full range of housing options are considered and that all information is current. Alternatively an existing statutory or community and voluntary sector service could further develop their capacity to deliver such a service.

*“Given their experience of all housing types, this might best be provided by a housing association. However in its most basic form, it may even prove effective to carry out widespread training and raised awareness among all housing staff in the social housing sector”.*

**FOLD**

*“Disability Action believes that a good starting point toward the establishment of a Housing Options service would be to map out what services are currently available in different areas of Northern Ireland. There are examples of community-led or council-led initiatives which provide useful services to disabled and older people but these are not consistent and dependent upon locally available funding. Services are often short-lived again because of funding issues and a reliance or dependence upon a service may develop only to be left unmet”.*

**Disability Action**

*“It should contain information on both social and private sector housing opportunities, the supported living schemes in the area and opportunities for floating support. It should be supplemented with information on health and social care services available in the area. Finally it should contain information on financial support available”*

**NIHE**

## **If yes, what specific areas should it provide advice about?**

Areas that a housing advisory service might address included:

- Future proofing your home for older age;
- Statutory funded Adaptations;
- Self-funded Adaptations;
- Moving /Selling Home and advice about finding a suitable home to buy or let;
- Legal advice and procurement of services –assistance when selecting architects, builders, etc. “Trusted Trader Scheme”; and
- A Handyperson’s service is considered a good idea to be developed alongside Housing Options Services.

*“This service should integrate with existing information providers e.g. “Fold Staying Put” so there is continuity of advice and support. It is an ideal opportunity for statutory, community and voluntary sector organisations to work in partnership in providing advice, enhancing a self-help ethos through provision of accessible and timely information and developing other initiatives e.g. Handyman service”*

**SHSCT**

These services could include face to face options for service delivery – with home visits and free telephone advice.

While the further development of housing options, services, or potential handyperson services are an essential element in any partnership working, this will require significant consultation and co-ordinated planning between Departments, NIHE Supporting People, PSIS Grants the HSC Board/HSC Trusts and the Voluntary and Community sector.

## **2. INTERAGENCY CASE MANAGEMENT**

This section explores a range of issues to be considered when strengthening interagency working for disabled people with complex needs or where high cost solutions may be required to meet assessed needs. A strong theme emerged around the need for improved planning and co-ordination at all organisational levels to clarify responsibilities and streamline the system of housing adaptations delivery particularly for people with complex needs.

### **Recommendation 4 – Improving Joint Working**

#### **A one stop shop model**

Fold referred to its Staying Put team, as a bespoke HIA (Home Improvement Agency) working specifically in the field of adaptations, which has specialist expertise and experience. Fold suggested that both departments should consider jointly funding a single body capable of providing a turnkey adaptation service, including an integrated IT case management system with access by all stakeholders, which would help reduce delays in the

process. This would also enhance transparency and accountability among agencies with the applicant having visibility of their case from end to end.

In relation to perceived inconsistencies in approach between the sectors and the HSC Trusts, it was agreed that this needed to be addressed to ensure the direction of approach is consistent in meeting the needs of those with complex disabilities. While the Joint Housing Adaptations Steering Group, Fold Staying Put/Gable networks, have been established to co-ordinate housing adaptations provision it was still considered that more was required to be done especially in relation to people with more complex disabilities.

*The arrangements between the DSD/NIHE and DHSSPS about financial contributions or topping up need to be reconsidered as Northern Ireland's current adaptations service provides the private sector homeowner who cannot afford it with no easy alternative solution to shortfalls in meeting the cost of the DFG and often many people are simply left without the recommended works ever being carried out, which increases potential for trips and falls and increases levels of vulnerability"*

*"Between April 2012 and March 2013, Shelter NI recorded 110 DFG applicants in the North West area who closed their grant application. Some 25 applicants last year were unable to meet the financial contribution required".*

**Shelter NI**

NIHE PSIS continually review their grant processes with a view to reducing the burden on individual grant applicants in completing their applications. Furthermore they are also currently exploring the potential for a loans system to compliment the current mandatory grants scheme.

## **Design Toolkit**

NIFHA referred to the positive feedback from the evaluation of the adaptations design communication toolkit and the anticipated roll out across NI should provide the mechanism for more effective interagency working and communication.

The Toolkit will address a number of interagency communications i.e. recommendations/specifications and checking key stages of work progress. Although this does address several cross sector communications issues it does not constitute a full cross sector electronic case management system.

Case management and communication between the relevant organisations on a given case should be paramount and a number of responses identified the need for further development of integrated cross sector IT systems to support complex case management.

The College of Occupational Therapists and the Health and Social Care Trusts agree and would support the HSC Trusts and Housing Providers to jointly deliver services to people with the most complex disabilities.

## **Service Standards**

Strong support for the development of common standards of customer services across all housing tenures and HSC Trusts were expressed as was the need for definitive documentation to ensure consistency of approach and equitable service standards across all housing tenancies.

*“We agree that measurable standards of customer service should be developed for adaptations in all housing tenures. This would enable shortfalls in service provision to be identified and addressed and applicants would experience a more equitable and consistent service. These standards should be defined in the first instance and improved over time, under the guidance of the Disabled Housing Practitioner’s Group”.*

**Fold**

*“Measures to improve consistency and real partnership across housing and health, including development of common standards of customer service between social and private sector housing and the trusts, have the potential for positive change.”*

**NIFHA**

## **Dedicated Housing Occupational Therapists**

There is broad support across all sectors for dedicated Housing Occupational Therapists working in partnership with housing colleagues in an extended role, e.g. development of the accessible housing register, planning new build schemes, assessing complex case work, and assisting with complex allocation/adaptations.

The Northern Health and Social Care Trust has a dedicated clinical specialist Occupational Therapist in Housing already in place and sees the value of such a post to be recommended for each of the HSCT’s with similar responsibilities.

*“The Commissioner welcomes the introduction of specialist Occupational Therapist posts for housing services. However, the Commissioner is concerned about waiting times for Occupational Therapy (OT) assessments with 50,000 referrals handled by 200 OTs. The Commissioner is of the view that the Departments should increase the overall provision of OT services for housing adaptations in order to reduce waiting times.”*

**Commissioner for Older People**

Under DHSSPS oversight the HSC Board/PHA monitor waiting time performance for Occupational Therapy services, and consider commissioning responses.

## **New Build Schemes**

Clanmil suggested that there should be closer collaboration between HSCT Occupational Therapy and NIHE when planning the strategic complex need units to ensure they are built in the right location and are designed around particular needs of service users.

It is essential that key people working in housing and health and social care should be trained in cross sector working practices to enable them to provide a first class service.

## **Electronic Assistive Technology in the Home**

Home Electronic Assistive Technologies (also known as environmental controls) are particularly important for people with extensive disabilities who cannot independently move around or control essential everyday appliances in their home.

*“Assistive Technology will enable the young person to control their own environment – simply turning off their own TV at night from bed when it suits them rather than asking the parent to wait up until the child (who is now an adult) is ready to sleep. Similarly at morning times or when in bed during the day due to pain, stamina or fatigue, they can make unaided changes to their environment that others simply take for granted. This is called choice and control – the true meaning of independence”.*

**Parent of Disabled Children NI**

*“To talk about someone’s ability to close and open their own door is difficult, it is something non-disabled people take so much for granted, it is natural – like breathing. However, for a disabled person with limited strength in their hands and as wheelchair users this is another essential – simply for access, safety, warmth, quietness, and access to other parts of the home and other people. This is part of being human. Environmental controls can provide these functions”*

**Parents of Disabled Children NI**

Significant cross sector evidence regarding the difficulties experienced by service users and providers in relation to accessing and maintaining home electronic environmental controls was expressed. Although a review of Electronic Assistive Technology was excluded from the original Terms of Reference, subsequently it has been recognised that a review of this area would be helpful and this has already been reflected in the review recommendations. This area will require a joint policy and commissioning framework.

Fold would welcome consistency across departments on this matter. It was their opinion that *“given the advances in Electronic Assistive Technology (EAT) and its widespread recognition in sustaining tenancies and preventing hospital admissions, EAT must be a key component of a future Joint Adaptations Service”.*

NIFHA would welcome greater clarity in relation to equipment and aids i.e. structural and non-structural items and a more joined up approach to the provision of EAT as new technologies are evolving.

The College of Occupational Therapists and Health and Social Care Trusts agreed that EAT could support service provision for older and disabled people though issues around funding, procurement and ownership/maintenance, criteria for provision, back-up systems etc. would need to be addressed. While some respondents’ views on what should be provided by means of EAT highlighted their frustration with the system of provision, those with extensive disabilities considered that this technology is essential to provide a better quality of life and support independent living for the person with the disability and, importantly, for the whole family and their carers.

There is widespread cross sector support for an urgent, dedicated, stand alone review of environmental controls for disabled and older people.

Early scoping work on this priority area is underway through the Disability Housing Design Panel.

### 3. RESOURCES, PROCUREMENT AND RECYCLING

#### Recommendation 5 - Improving information on existing resources

There is support for the further development of collaborative cross sector data exchanges between HSC Trusts and housing providers to underpin strategic planning of housing services for disabled people and the data exchange between Regional Disablement Services and the NIHE Geographical Information System (GIS) mapping unit to identify the unmet housing needs of wheelchair users was welcomed.

The common theme from all the agencies who responded was that the adoption of a co-ordinated approach in sharing information should have consistent terminology, benchmarking, and strategic planning.

The creation of an accessible housing register for social housing was strongly supported by respondents from all sectors together with the need to improve accessibility information on housing provided for rent or sale in the private sector.

#### Consultation Question 4

***In respect of private sector homes for sale or rent, would you like to see more detailed information concerning accessibility features being made routinely available in the property's description?***

- 81% of those who responded considered that improved information on accessibility in the private sector would be useful in facilitating people in focusing their efforts to find a suitable property commensurate with their needs. It would also be useful where people needed to decant during property adaptations or when moving out of care;
- 3% said no;
- 5% were unsure; and
- 9% gave no comment.

The majority of respondents stated that as part of the general sales package programme for private sector properties, it would be useful to include details of access standards and adaptations. This could be incorporated by estate agents in their property information package, which would assist people looking for accessible properties. It was considered that the Scottish Single survey fact sheet could be adapted for use in respect of properties in Northern Ireland.

There was overwhelming support for this proposal and that it is potentially achievable through a voluntary code of good practice supported by Estate Agents, but if necessary, legislation could be introduced in due course, which was the case in Scotland. In the first instance, it would be important to engage proactively with Estate Agents and their professional representatives to garner their support by outlining the market advantages of developing improved information for housing for rent or sale.

The range of information that will be captured includes:

- Floor plans, shape of rooms, size of rooms, number and location of bathrooms;

- Adaptability of property i.e. for stair lifts or available garden space;
- Energy efficiency;
- Number of steps;
- Door/corridor widths;
- Any existing adaptations;
- Sensory disability facilities;
- Proximity to shops, bus stops, doctors, hospital;
- In rural areas – footpaths/street lighting;
- Space for wheelchair access or parking for disability cars; and
- Lifts.

### **Recommendation 6 – Procurement/Recycling**

There was a high level of support for recycling of adaptations equipment if this is undertaken to high quality standards in respect of infection control, maintenance, and repair. NIFHA identified one particular area of recycling which was problematic.

*“Recycling of adaptations equipment has proven to be problematic in housing associations. For example, recycling stair lifts has previously caused maintenance problems due to the lack of available parts for repairs. The development and continuous improvement of new models of stair lifts or any other adaptation aids has often meant that recycling them is not feasible.”*

**NIFHA**

The general view of many respondents was that the HSC Trust and housing providers should consider co-ordinated procurement opportunities and pilot methods where practical.

### **Moving from adapted properties**

A number of the organisations who responded suggested that people who had lived in their present accommodation for a long period of time were unlikely to wish to move elsewhere, therefore the emphasis should be placed more on how best the property could be adapted, and only as a last resort should the issue of moving to another property be considered. There was also concern that in the event of a disabled person no longer requiring a property which had been adapted, any potential discussion regarding relocation of existing family members should be sensitively considered and reflect their rights and needs.

Concerns were also expressed about what happened once an extra room was no longer required and how this would affect people who may now be required to pay extra rental costs for under-occupancy as a result of welfare reform policy.

The Accessible Housing Register will provide improved information to help people make informed decisions regarding housing options.

## Consultation Question 5

***Off-site, pre-constructed, modular adaptations (PODs) have the potential to offer a more rapid and less disruptive response to the provision of adaptations, including extensions, to disabled people's homes. Would you like to see greater use of this facility?***

There was considerable support for PODs as an additional means of providing housing adaptations, but most respondents recommended an incremental approach to implementing this proposal.

- 76% of those who responded were in favour of the use of off-site, pre-constructed, modular adaptations;
- 19% of those who responded approved in principle that they may be useful in the short term but they were unsure whether in the long term they would be cost effective, or robust enough as opposed to traditional extensions; and
- 3% made no comment.

The majority of respondents (even those who said yes) agreed that further development and evaluation should be carried out before decisions are made regarding more widespread use of pods.

A number of concerns were identified, these included:

Welfare Reform Policy Impact	The impact on Housing Benefit where there is under-occupation.
Cost effectiveness	How many relocations are required before it pays for itself and how many moves before it is no longer useable? How to standardise design to assist bulk purchasing of pods to keep costs down.
Re-usage	Refurbishment of fittings, removals, storage and, transport costs.
Environmental site constraints	Inner city sites; how can PODs be accommodated in constrained inner city sites or inaccessible rural locations? Planning permission issues.
Health & Safety	Decontamination issues. Effectiveness of heat retention, particularly when taking account of various medical conditions, and soundproofing.

Opinions were expressed that the use of modular ramps (subject to further technical development) may be a quick and easy solution to access problems and can be installed and removed with the minimum of disruption or damage.

A number of respondents stated that further evidence was required to support the view that PODs were indeed a faster and more cost effective means of delivering housing adaptations than traditional build methods. Other responses identified that further development work will be required to standardise the design and reduce costs and

streamline the procurement and delivery pathways before they can be more widely and routinely used. Most respondents felt that PODs had potential to be more widely used, particularly if targeted in the following circumstances:

- Limited life expectancy;
- Short term use; and
- To address technical constraints.

*“Bathroom PODs and ramps are possibly more practical in terms of re-use and more cost effective”*

**College of Occupational Therapists**

*Building Control advised that they had “introduced a ‘Type Approval’ scheme where pre-constructed modular adaptations could be approved across NI which would mean that the time to seek building control approval would be greatly reduced”*

**Building Control NI**

*“Accessories such as ramps and lifts whether stairs or ceilings should be shared and removed if the person no longer needs them”.*

**Sinn Fein**

## **4. DESIGN STANDARDS**

### **Recommendation 7 – Standards**

#### **Consultation Question 6**

***In considering housing adaptations generally, and in the construction of new homes, are there any major areas where new disability design standards need to be developed?***

*“For parents with disabled children a well adapted home assists so much with the practical and emotional tasks of caring, nor carrying children up stairs – thus less risk of injury. Caring tasks are made simpler with all the equipment close to hand and easily accessible with no necessity to put it away after use to make space. Privacy is afforded to both the disabled child and parent and therapists”*

**Parents of Disabled Children NI**

Although the primary focus of this review is on housing adaptations, comments were welcomed on new-build schemes for disabled people as good design practice in the housing adaptations programme is often transferable to the new-build scheme and vice versa.

#### **New-build Housing**

Respondents acknowledged the achievements of the NIHE and their partners in developing new-build housing design standards for disabled people.

In respect of new-build housing standards, there was strong support for lifetime homes complemented by wheelchair standard housing in social housing stock. Further support was evident for the concept of applying these standards to the private sector where there are no

readily available lifetime homes or wheelchair standard properties currently available in Northern Ireland. It was highlighted that wheelchair standard housing needs to be built alongside lifetime homes as they are not the same specification and some people still do not understand that lifetime homes may not in reality meet the needs of all wheelchair users.

*“Complex needs requirements/specifications do not always meet Housing Association Guide requirements – this would need to be reviewed”*

**Clanmil**

A cross sector good practice guide for the development of new build housing for disabled people, endorsed by both departments would address this concern, as the toolkit has for housing adaptations.

### **Housing Adaptations**

There is also widespread support for the development of the Adaptations Design Toolkit created by HSC Trusts and housing providers, and its regional implementation.

There was almost unanimous agreement that there are a number of areas where new disability design standards for housing should be further developed.

89% responded with constructive feedback, 4% negative, 7% were unsure what new disability design standards they would like to see developed.

Systematic development and or integration of existing good practice standards for new-build and adaptations design are required for the following situations:

- Dementia/cognitive problems;
- Chronic illness where facilities such as home dialysis/oxygen etc. are needed;
- Energy efficiency and the ease of controlling heating for older and disabled people;
- Challenging behaviour/severe autism/learning disabilities;
- Sight/hearing loss;
- Bariatric design;
- Disabled Children;
- Environmental controls such as automatic door/window openers;
- Storage solutions; and
- Consideration of facilities in the outdoor environment: dropped kerbs, accessible parking and access to public transport.

*“Longer term view is needed with specifications including provision for growth of children”  
“failure to allow for children’s growth can prove very problematic and challenging”*

**Simon Community**

Several respondents stressed the need to retain and develop “bespoke” responses to the housing needs of disabled people, alongside “standardised” responses which can improve

efficiency and cost effectiveness, particularly for people with learning disabilities; complex or multiple disabilities.

The residents of the Upper Springfield Development Company considered that “easy access to garden to enable them to maintain it” as an important design consideration.

### **Training Needs**

*“Disability awareness training for those contractors carrying out adaptations to people’s homes”*

**ANON**

In addition to the implementation of the toolkit for routinely recommended housing adaptations it is recognised that there will need to be a rolling programme to integrate emerging good practice into design standards. Good practice currently exists for people with sight loss and people with dementia, which should be incorporated into occupational therapy recommendations and current design practice. This process is already underway. In other situations e.g. design for people with autism new dedicated research is required.

## **5. EQUALITY**

### **Consultation Question 7**

***Do you have any evidence to suggest that the proposals within this document would create an adverse differential equality impact on any of the nine equality categories under Section 75 of the Northern Ireland Act 1998?***

Responses to this question included:

- 44% indicated that they had no evidence of any adverse differential impact;
- 35% made no comment on this question;
- 11% were unsure; and
- 9% stated that they did in fact believe that there may be potential for adverse differential impact.

Several respondents stated that it would be important to ensure that there was a full equality impact assessment by the Equality Commission.

*“The Commission advised the Northern Ireland Housing Executive on equality and human rights matters prior to this public consultation exercise and we acknowledge that many of the issues we highlighted have been taken into account in the consultation paper.”*

***Equality Commission***

The Equality Commission have examined and provided a comprehensive response to the consultation papers.

The Commissioner for Older People expressed some concerns:

*“The Commissioner is of the view that any proposals for housing adaptations should be subject to a full Equality Impact Assessment. It is the view of the Commissioner that there may be an adverse differential impact on the grounds of age, given that the majority of older people live in the private sector and there are gaps in the provision of access to information and support and funding for housing adaptations in the private sector that need addressed. Given the diversity amongst older people, there is a need for adequate disaggregated data on older people in the public and private housing sector to ensure that housing adaptation services are monitored and appropriately targeted to meet the needs of older people. The Commissioner is of the view that the Departments should review their data processes to ensure that the data available is capable of disaggregation at an appropriate level to ensure appropriate monitoring of the impact of the provision of housing adaptation services on equality grounds, as set out in Section 75 of the Northern Ireland Act 1998.”*

**Commissioner for Older People**

*“With the number of older people rising significantly in the coming decades many of whom would have poor health, maintaining the option of independent living provides both government and individuals with a number of challenges. Older households are likely to live in older housing stock which may not be suitable for adaptations. We need to ensure that older people are treated equally.”*

**College of Occupational Therapists**

Several respondents felt that it would be important to ensure that there was a full equality impact assessment on housing adaptation proposals. DSD completed an Equality Impact Screening Assessment in July 2012 on the review. This policy targets persons with disabilities who will be positively impacted. As disability prevalence increases with age, older people will benefit but this is a function of their disability status, not their age. The policy is intended to help persons with disability who require adaptations to their home, regardless of any other section 75 characteristics they might have and it was therefore not proposed to carry out a full EQIA.

In addition, the formulation of the high level action plan and the final outcomes focussed report will seek to mitigate consultation feedback received in respect of equality related issues. Also, the action plan and final report will be subject to further consultation.

## Consultation Question 8:

***Are there any aspects of this action plan/policy where potential human rights violations may occur?***

- 44% indicated there were no aspects of the action plan/policy where they considered that potential human rights violations may occur;
- 35% had no comments to make;
- 13% were unsure; and
- and 7% indicated some concerns, some of which are listed below:

Where the consideration to the specific needs to those with Learning Difficulties is not recognised, there is potential for human rights violations.

*“While proactively ensuring equality in access to adaptations for the majority of people with disabilities, we must ensure that the needs of those requiring less ‘standard’ solutions are not disadvantaged. Currently many people with learning difficulties make few demands on many of the immediate solutions to access within the home, such as stair lifts, or through floor lifts; however, they may require a more specific resource not currently specified in written criteria. COT Specialist Section in Learning Disabilities Northern Ireland would like to see acknowledgement of this difference in resource requirement in order that this group may be treated equally.”*

**COTSSPLD**

## 9. RURAL PROOFING

### Consultation Question 9

***Do you have any evidence to suggest that the proposals within this document would create an adverse differential impact on rural areas?***

Few specific adverse impacts were noted as a result of this review and its proposals. However, a number of additional considerations have been identified when providing housing services in rural areas which need to be considered by service planners and providers:

44% indicated that they believed there would be no adverse differential impact on rural areas, 5% were unsure, 46% had no comments and 4% indicated there would be a differential impact for people living in rural areas as listed below.

These include;

- general challenges regarding the dissemination of service information;
- transportation and the distance to access providers in rural areas;
- a reduced availability of housing options such as housing transfers and temporary decant properties;
- additional on-site planning considerations; and
- potential additional technical constraints and resultant financial considerations.

This would indicate a need to ensure and strengthen transport links, office contact, access to services, social supports, individual choice and networking.

*“The lack of adequate broadband provision may also be an issue in some rural areas, creating a barrier to communications and engagement with disabled people in those areas”.*

**NILGA**

### **Further areas of research identified.**

In addition to the recommendations for housing design research and development, there was also a proposal for research into meeting the temporary housing needs of disabled people who are homeless.

## List of Respondents

Alzheimer's Society	1
Anonymous Easy Read	7
Autism Network Northern Ireland	1
Belfast HSC Trust	1
Building Control Northern Ireland	1
Cedar Foundation	1
Chest Heart and Stroke	1
Clanmil Housing	1
College of Occupational Therapists	1
Commissioner for Older People NI	1
Community of Refugees and Asylum seekers	1
COTSS-Housing UK	1
COTSS-People with Learning Disabilities	1
DARD	1
Disability Action	1
Disability Forum	1
DUP	3
Equality Commission	1
Fermanagh District Council	1
Fold	1
Frances Heywood University of Bristol	1
Housing Council	1
HSC Board	1
Ian Bowler	1
Michael Doyle NIHE	1
NIFHA	1
NIHE	2
Northern Health and Social Care Trust	1
Northern Ireland Council for the Homeless	1
Northern Ireland Housing Executive Disability Forum	1
Northern Ireland Local Government Association	1
Parents of Disabled Children	1
PHA	1
RNIB	1
SDLP	1
Shelter	1
Simon Community	1
Sinn Fein	1
South Eastern HSC Trust	1
Southern Health and Social Care Trust	1
Upper Springfield Development Association	7
Western HSC Trust	1
Consultation events	3
<b>Total Responses</b>	<b>60</b>