

Housing Rights

www.housingrights.org.uk
@housingrightsNI

Consultation Response

Response to DSD/DHSSPS Inter- Departmental Review of Housing Adaptations Services: Final Report and Action Plan 2016

April 2016

when everyone has a home

Introduction

Housing Rights welcomes the opportunity to respond to the Department for Social Development and Department of Health's Review of Housing Adaptations: Final Report and Action Plan 2016.

Housing Rights has over 50 years' experience of offering advice, support and representation to clients in housing need; our work includes assisting our clients to secure important housing adaptations which are integral to ensuring clients can sustain their homes.

Housing Rights therefore welcomes the publication of this Report and Action Plan, and offers the following comments.

Summary

Housing Rights supports the Report's commitment to continue housing adaptations services, in order to 'enable people with disabilities to remain at home and enhance their independence within their local community.'

Housing Rights' experience in advising and supporting clients in need of housing adaptations leads the organisation to make the following recommendations:

- The Departments should ensure that all social landlords are fully aware of their responsibilities in relation to minor housing adaptations. Critically, social landlords should ensure staff involved in making decisions on minor housing adaptations are supported in doing so with appropriate skills and knowledge and have access to sufficient resources to deliver on their responsibilities.
- Housing Rights welcomes the Action Plan's recognition of the importance of service user involvement in policy development. Particular efforts should be made to ensure that service users who are 'easy to ignore' are supported to actively participate.

- The Joint Housing Adaptations Steering Group should develop a database of key relevant statutory contacts and decision-making protocols relating to housing adaptations, which can be shared with the independent advice sector.
- Housing Rights fully supports the plans to explore the potential for a Housing Options Service for older people, and possibly other particular target groups. Housing Rights notes the recent draft Key Inequalities in housing report which specifically highlights the inequality faced by people aged 60 and above, who are more likely to live in homes that require adaptations. In order to maximise the usefulness of a Housing Options for Older People service in sustaining tenancies, the service should be customised to meet the particular needs of this group.

1. Social housing providers' responsibilities for minor adaptations

Housing Rights welcomes the recommendation, originally included in the Adaptations Design Communications Toolkit of 2014, that the DSD and the DHSSPS should 'ensure that there is a consistent range of minor social housing adaptations, which can be provided without the need for referral to HSC Trusts for assessment, thus harmonising NIHE and Housing Association provision.'¹

Housing Rights regularly provides advice to tenants who require essential, but relatively minor, adaptations to their homes. Successfully completing these adaptations without the requirement of a referral from social landlords to HSC Trusts can sustain homes in a way that is time and cost-efficient, for both the landlord and the tenant.

¹ DSD/DHSSPS Inter-Departmental Review of Housing Adaptations Services: Final Report and Action Plan 2016', p9

However, Housing Rights would recommend that within the final Report and Action Plan, DSD and DHSSPS take steps to ensure that all social landlords are adequately empowered to make accurate decisions on minor adaptations, and their duties in this area, particularly as they relate to the Disability Discrimination Act 1995. Access to training and information as well as appropriate monitoring of compliance with regards to these responsibilities, would ensure that the provision of minor adaptations is harmonised across all providers, without the need for automatic referrals to HSC Trusts.

2. Involve service users in policy development

Housing Rights is encouraged by the recognition in the Report and Action Plan that service users should be involved in planning and policy development. This will be particularly important in the delivery of several of the Action Plan's recommendations e.g. recommendation 12 'to develop common standards for user-centred services across all housing tenures' and recommendation 15 'improve information on the accessibility features of private sector housing for rent or sale'.

Specific actions noted in recommendation 15 for example, include to 'engage service users in the identification of good practice guidance regarding accessing and presentation of accessibility information on private sector housing for rent or sale.

Additionally, recommendation 20 is to 'undertake a study on the accommodation needs of homeless disabled people'. Responsibility for this action lies with the NIHE and the Action Plan notes that research is to be carried out with service user involvement.

Housing Rights would welcome the opportunity to be more involved in this work, particularly with regards to ensuring opportunities for meaningful service user involvement in policy development. To that end, the Departments may find useful research commissioned by Housing Rights and carried out by Dr Jenny Muir and

Mary McMahon which identifies how 'easy to ignore' groups, could be more fully involved in housing policy.²

3. Involve advice sector in policy development

Housing Rights welcomes the Departments' commitment to determine and develop the 'optimal infrastructure' for strategic housing adaptations policy development 'in consultation with internal and external partners.'

Housing Rights would welcome being involved in this process. Additionally, Housing Rights recommends that in order to support the role of independent advisors supporting people in need of minor adaptations, consideration should be given to the development of a database of key relevant contacts in DSD, the DHSSPS, the NIHE and any other statutory agencies; and any relevant adaptation protocols in these agencies. Knowledge of such contacts and protocols would be of significant value to our advisers in their work advising and advocating for tenants, contributing to improved working relationships between voluntary and statutory bodies and most importantly, better outcomes for tenants.³

4. Housing Options Service(s) will require tailored approach

Housing Rights welcomes the Departments' plans to 'explore the potential of a housing options service to support older people'⁴. The Departments will be aware of recent research by the Universities of Ulster and Cambridge, commissioned by DSD, which has recommended the Housing Options approach in order to pro-actively sustain homes and deliver high-quality, person-centred advice and services.⁵

² Muir, J et al (2015) 'Involving Everyone Including 'easy to ignore' groups in housing policy and strategy development in Northern Ireland', see http://housingrights.org.uk/sites/default/files/Easy%20to%20Ignore%20Full%20Report%20-%20June%202015_0.pdf

³ Ibid., p12

⁴ Ibid., p16

⁵ Gray P et. al. (2013) 'Research to inform a fundamental review of social housing allocations policy: Final Report', pp20-24

Housing Rights views the Housing Options for Older People proposal in the Departments' plans as particularly relevant in light of the Equality Commission draft statement of Key Inequalities in Housing, which notes an inequality for older people, particularly those aged 60 years and older, who are more likely to live in homes that require adaptations.⁶ The importance of supporting older people to sustain their current homes, rather than residential care is included in the ECNI statement, with reference to further research which highlights the cost-effective nature of sustaining homes via minor adaptations for older people. Oldman's Housing in Later Life report for Age UK⁷ highlights the average cost of a home adaptation to be in the region of £6,000 – much lower than the average cost of residential care (£26,000).

In order to maximise the success of a Housing Options Service for older people, and/or expanding this approach to target groups including 'young disabled people leaving home and adults with learning disabilities whose parents are growing older'⁸, careful consideration of the specific needs of these groups to ensure that this service is tailored to meet the needs of these groups.

For further information on this response please contact
Stephen Orme, Policy & Public Affairs Officer,
Housing Rights,
(t): 028 9064 5640, (e): stepheno@housingrights.org.uk

⁶ ECNI (2016) 'Key Inequalities in Housing and Communities, Draft Statement' p.14

⁷ Oldman, J. (2014) 'Housing in Later Life'

⁸ 'Final Report and Action Plan 2016', p16