



INDEPENDENT LIVING
MOVEMENT IRELAND
FREEDOM · RIGHTS · EMPOWERMENT

www.ilmie.ie

(Image shows ILMI logo with Text: Independent Living Movement Ireland.
Freedom, rights, empowerment and website address www.ilmie.ie)

**Independent Living Movement Ireland submission on the Department of
Housing's Review of Housing Adaptation Grants for older People and People
with a Disability**

July 2022

Introduction to Independent Living Movement Ireland

Independent Living Movement Ireland (ILMI) is a campaigning, national Disabled Person's Organisation (DPO) that promotes the philosophy of independent living and seeks to build an inclusive society. ILMI works with disabled people on a cross-impairment basis. Central to the way we work is to ensure that policy and legislative discourse and decisions that impact on the lives of disabled people have to be directly influenced by those whose lives are directly affected.

Our philosophy can be summed up as: 'Nothing about us without us!' and 'Rights Not Charity'. Our vision is an Ireland where disabled persons have freedom, choice and control over all aspects of their lives and can fully participate in an inclusive society as equals.

Social model of disability

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) at its core is framed through an understanding of disability known as the social model of disability. From ILMI's perspective, it is vital that there is a clear and full understanding of what the social model of disability is and how it should inform future discussions on policy development and improvement and policy implementation.

The social model looks at how society is structured and how it disables people. It is not based on a person's impairment, it is focussed on the

barriers that exist in terms of attitudes, policy development, access or lack of supports that prevent people from participating in society as equals, with choice and control over their own lives. In this model it is society that disables people from achieving their hopes and dreams, not a person's impairment. The social model informs all aspects of the work of Independent Living Movement Ireland.

Language and representation of disabled people

Independent Living Movement Ireland recognises that language is a very powerful and evocative tool. Therefore, the language and terminology used in this submission has been carefully chosen to reflect the values of equality and empowerment which is at the core of this organisation. The term 'disabled people' has been used throughout the submission in accordance with the UPIAS classification of disability and impairment which has been developed by disabled people themselves (UPIAS 1976). Where disabled people are referred to in the submission this should be understood to include all disabled people, including those with learning difficulties, people with intellectual impairments, people experiencing emotional distress and physical and sensory impairments.

Context

ILMI has a strong policy position on housing for disabled people. ILMI has consulted their members on various aspects of housing related issues given it is one of our strategic priorities. ILMI has analysed the National housing strategy for people with a disability 2016 to 2020 (and the strategy rolled over to 2021) and have been involved in the development of the New National Housing Strategy for Disabled people 2022 to 2027. In addition last year ILMI consulted its members in relation to article 19 of the UNCRPD which included housing and housing adaptations. In July last year ILMI, in partnership with Inclusion Ireland, developed a joint housing campaign entitled "[Our Housing Rights: The Housing crisis Disabled people face](#)". This involved both organisations consulting their members over the course of six consultation spaces made up of disabled people, supporters of disabled people, families and allies. The findings of these consultative spaces were published as a report last September. Most recently we conducted a specific facilitated consultation on housing adaptations with an open call to disabled people through our online newsletter (eBulletin) and social media channels. ILMI consulted disabled people who have been directly impacted by these housing adaptation grants from right across the country.

Please see issues and recommendations from our members below.

ILMI observations and recommendations for the review of housing adaptation grants

1. Means Test and Income Thresholds

Issue:

The Housing Adaptation Grant is restrictive in terms of its income threshold and means test. The qualification test is based upon your combined gross household income from the previous taxation year. That threshold may no longer be reflective of your current household income, which may have substantially reduced particularly if you have acquired an impairment or if your impairment(s) has prohibited your current employment options. Such practice effectively penalises the family unit for having a disabled family member.

Recommendations:

- Review the qualifying means test to ensure it is:
 - Reflective of the individual's current financial circumstances.
 - Fair and equitable in terms of the threshold applied to the current household limit.

2. Threshold Applied to New Build Adaptation Works

Issue:

ILMI welcomes recent updates to Guidance for Local Authorities, which now allow for applications for adaptations on new builds. However, to qualify for the Housing Adaptation Grant on a new build construction must be complete to wall plate level. This immediately causes difficulties when contracting builders as it effectively stalls the construction of the build until a decision on the grant application has been reached. The total grant allocation on a new build (less than 12 months) is also less than half of that on a house over twelve months old, which puts any applicant who requires adaptations after purchasing a house in a seriously disadvantaged position. Information on these criteria are unclear and not known by many. In some cases staff knowledge varies on the criteria of these grants too.

Recommendations:

- Review the current restriction, which allows applications only on builds complete to wall plate level.
- Remove the limit of half the overall allowance for houses under 12 months/new builds.
- Information and communication needs to be clear and consistent in relation to grant criteria on houses built less than and over 12 months. ILMI recommends that the Department should work with

DPOs to disseminate the pathways to grants and entitlements in order that disabled people can be adequately informed and access these grants.

3. Wait Times

Issue:

In some areas the wait time for a decision to approve an application can be up to six months or more. Given current inflationary pressures and the cost of construction, the actual cost of the build will have increased significantly within that timeframe. The applicant will also have been forced to live in accommodation, which may be totally unsuitable for their needs while they await the outcome of their application.

Recommendations:

- Review the efficiency of the application timeline for all applications
- Ensure all staff are aware of the specifics of the grant and can provide such information in a clear and timely manner during the application process.

4. Payment Schedule

Issue:

Payment of the Grant is retrospective. This means that the applicant must have sufficient financial means to carry out the works in advance and then reclaim the expense. For many disabled people this is simply not possible given the cost of disability meaning that the terms of the Housing Adaptation Grant actually prohibits individuals from applying for it. If a phased payment system was introduced it would make the grant more accessible for those to apply and to commence works on their property.

Recommendation:

- Introduce a phased-payment system for completed works under the grant scheme.

5. Assessment Process

Issue:

The qualification assessment report is prohibitively expensive for many disabled people. Given the current wait times for an Occupational Therapist (OT) Assessment, under the grant scheme an applicant may choose to contract a private OT to carry out the assessment report. The cost of this assessment may be reclaimed as part of the grant award. However, this allocation is part of the overall grant application and not an additional top-up of the overall grant.

Recommendations:

- Ensure the cost of the OT assessment is included as an additional top-up to the overall grant award.
- Our recommendations on what we need to live independently as disabled people must be factored into the grant assessment process (co production/ co development). Disabled people are the experts in their own lives

6. Assistive Technology

Issue:

The cost of Digital and Assistive Technology prohibits its inclusion in many Housing Adaptation Grants. This is particularly relevant to a new build, where the construction work itself will exceed the grant limit without the addition of digital or assistive technologies taken into consideration.

Recommendations:

- Digital and assistive technologies (DAT) need to be recognised in terms of the role it plays in liberating disabled people to live independent lives. However, it should not be used as a way to replace independent living supports such as Personal Assistance Services or in-home supports
- ILMI welcomes the Cooperative Real Engagement for Assistive Technology Enhancement (CREATE) initiative launched by Minister Rabbitte and the pilot relating to DAT users in Longford and Westmeath's Local Authorities. However, ILMI recommends that disabled people should get to apply and be involved in the process from the beginning rather than OTs, other healthcare professionals and service providers getting to make decisions about our lives. The learning from this pilot must be capitalised upon to ensure DAT requirements are separated from the current thresholds and limits applicable to the Housing Adaptation Grant.
- Personal Alarms should also be removed from DAT requirements and instead included as standard for any disabled person who requires one, under a similar scheme to that operated for those over 65. Personal alarms should not be limited to those only over 65 years of age.

7. VAT on Professional Fees

Issue:

If you not qualify for the grant VAT is recouped on construction costs only. At present the VAT on professional fees (engineers, architects etc.) is not an allowable expense, which can prohibit works for many disabled people who are already excluded due to income limitations.

Recommendation:

- Although the current process for reclaiming VAT is efficient, the exclusion of significant financial outlays on professional expenses are forcing many disabled people to continue to live in unsuitable accommodation, as they simply cannot afford to proceed with the required adaptations. The inclusion of professional fees must be reviewed to ensure parity for all individuals who fail to qualify for the grant itself.