



Response to Consultation

Date: 7th May 2013

Consultation: Inter-Departmental Review of Housing Adaptations Services

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide around 39,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background to Housing Adaptations in Housing Associations

The Northern Ireland Federation of Housing Associations (NIFHA) welcomes the opportunity to respond to the consultation with respect to the Inter-Departmental Review of Housing Adaptations Services as we and our member housing associations recognise the importance of the provision of housing adaptations. Housing adaptations enable people with disabilities to remain, living as independently as they possibly can within their own home.

Each year housing associations spend around £2.5m on housing adaptations, which is then claimed back in the form of grant from the Social Development Programme Group in NIHE. This expenditure and the adaption activities associated with it is closely monitored by the Northern Ireland Housing Executive (NIHE) and the Department for Social Development (DSD) inspection team to ensure it complies with the requirements of the DSD Adaptations Guide and meets the needs of disabled people.

The housing adaptations provided by housing associations range from those that are relatively minor such as grab rails to those that are major such as extensions to dwellings. NIFHA believes that as our population in Northern Ireland continues to grow older the provision of adaptation solutions will become ever more important. This remains one of the foremost reasons why social housing, in Northern Ireland, should continue to be built to the Lifetime Home standard. By building to this standard, housing associations, are providing social homes that are easily and more cost effectively adapted to meet the changing needs of their tenants.

NIFHA's Response to the Consultation Questions

1. Joint Development of the Policy and Governance Framework

Recommendation 1: – Closer working between statutory bodies

Consultation Question 1: Some minor social housing adaptations do not require prior referral to Health Trust Occupational Therapy Services. Are you aware of this? If not, what would you suggest could better publicise this fact?

NIFHA's response:

Housing associations are familiar with the examples of minor works not normally requiring occupational therapist referral which is contained in the DSD Adaptation Guide. Housing associations comply with this guide although there may be other versions of this list of minor works which are available to other housing providers and health service personnel. A definitive document should be developed to ensure consistency of approach and equitable service standards across all housing tenures.

NIFHA agrees that some adaptations that are minor by nature should not need an occupational therapist assessment. Housing associations have skilled staff with a competency level that would enable them to identify suitable solutions for minor adaptations. This would enable occupational therapists to dedicate their expertise to providing major or more complex adaptations.

Recommendation 2: – Improving partnerships

Consultation Question 2: How can representation and engagement from disabled people be further improved within housing adaptations decision-making structures?

NIFHA's response:

Disability Action currently represents disabled peoples' views on the Joint Housing Adaptations Steering Group. This group is an overarching strategic group which may mean that operational issues may be overlooked at times. 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 representative groups for disabled people.

Effective communication with disabled people about the range of adaptation services or housing solutions available to them would enable them to make informed choices to support their independent living. This could be achieved by greater partnership working between health and housing to ensure a holistic approach is taken to resolving an individual's adaptation or housing needs.

The implementation of the design communications toolkit, which was piloted in the Northern Trust area and West Belfast area of Northern Ireland, should provide the basis for improved communications between housing providers and the HSCT. This would ensure that the correct adaptations solutions are identified and developed for people who need them in a timely and cost effective way.

Recommendation 3: – The provision of advice and guidance

Consultation Question 3: Do you consider that a Housing Options Service would be helpful? If yes, what specific areas should it provide advice about?

NIFHA's response:

NIFHA welcomes the proposal to establish a Housing Options service pilot scheme to support older people in particular, to make choices about their housing options. To assist with assuring the success of the scheme we suggest that a number of housing associations participate in this pilot. As housing associations have significant experience and expertise in the development of housing solutions for older people and other groups of vulnerable people.

The Welfare Reform Bill may introduce the bedroom tax to Northern Ireland and as a result of this many working age people will have to evaluate their housing options. The Housing Options service could provide advice to this group of people and it could be further extended to providing realistic advice to applicants to the social housing waiting list or to people who want to transfer to another property within social housing. The adaptations review identified that there are a number of tenants, in social housing, living in an adapted dwelling that no longer need the adaptation, the Housing Options service could target these tenants and provide them with advice regarding their future housing options.

2. Inter Agency Case Management

Recommendation 4: – Improving joint working

NIFHA's response:

NIFHA recognises that good partnership working between the various agencies delivering adaptation solutions ensures that the person requiring the adaptation receives it within the required time threshold and that the work is value for money and undertaken to a high quality standard. The feedback from the evaluation of the adaptations design communication toolkit was positive and it is anticipated that the roll out of the toolkit across Northern Ireland will provide the mechanism for more effective inter agency working and communication. This should bring about a consistent and equitable approach for all housing tenures in providing adaptations. The toolkit will therefore contribute to meeting the adaptation needs of disabled people and ensure that there is value for money with respect to public expenditure.

NIFHA agrees 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 resolved, therefore ensuring that adaptations are equitable and consistently provided to a high quality standard.

Greater inter agency case management and communication will also ensure that there is equitable delivery of adaptations across all housing tenures. Disabled people should not be disadvantaged or have less access to adaptations because of their housing tenure or landlord, the development of consistent design and communications standards will assist in providing a sound foundation for equitable service provision across all housing tenures.

Feedback from housing association staff during this review indicated that communication can at times breakdown with occupational therapists especially as a result of staff turnover and leave. NIFHA would therefore welcome the provision of a

dedicated occupational therapist in each HSCT as a contact point of reference for housing adaptations.

3. Resources, Procurement & Recycling

Recommendation 5: – Improving information on existing resources

NIFHA's response:

NIFHA agrees with the development of a register for social housing that has been purpose built or adapted for disabled people. To assist in the development of an accessible housing register we have been working with NIHE for some time to develop a comprehensive social housing property database. NIFHA has provided NIHE with details of housing association properties and these have been added to the Geographic Information System. Included in the property details are whether or not the properties are bungalows and information is provided regarding those that are wheelchair accessible.

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? How might this be achieved?

NIFHA's response:

Accessibility information could be provided in the same way that energy performance information is provided when advertising private sector properties for sale or rent. The proposed future housing bill could contain a clause requiring vendors or landlords to provide accessibility details when selling or renting properties to new tenants.

Recommendation 6: – Procurement / Recycling

NIFHA's response:

NIFHA is keen to explore any procurement opportunities that will enhance efficiency and enable adaptations to be provided which are timely and value for money. We are currently examining the feasibility of future collaboration opportunities with Health and Social Care Northern Ireland (HSCNI) and Central Procurement Directorate (CPD). Housing associations could realise real savings, through the economies of scale, for items such as medical or nursing aids if they had access to these large framework agreements for non works supplies and services.

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. In many cases HSCT will not collect portable aids, they have supplied, because of fears of cross contamination. In a number of cases housing associations have been required to store these items for

considerable periods of time. There needs to be greater clarity around the policy for recycling and the collection or not of portable aids.

Consultation Question 5: Off-site, pre-constructed, modular adaptations 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? If yes, please give your reasons?

NIFHA's response:

NIFHA's understanding is that there has not been a significant uptake of these types of adaptation. Care would be needed to ensure that the provision of this type of adaptation didn't compromise the fabric of the building, causing dampness and / or other problems. We therefore propose to reserve our judgement on the effectiveness of this facility until it has been further evaluated.

4. Design Standards

Recommendation 7: – Standards

Standards could be improved if:

A lifetime home standard for all new build housing; and the provision of wheelchair standard housing, built in response to an identified need;

NIFHA's response:

NIFHA agrees that because of our aging population a lifetime home standard should be applied to all new build housing for all tenures in Northern Ireland and that wheelchair standard housing or housing that may be adapted to wheelchair standard should be built where the need for it is identified. By building to the lifetime home standard, housing associations have been delivering homes that can be more easily adapted, if it becomes necessary to do so. The provision of items such as a level entrance threshold, the provision of space for a bedroom at entrance level and installing drainage for a future accessible shower means that adaptations are easier to provide and normally cost less than in a non lifetime home.

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?

NIFHA's response:

There needs to be greater clarity regarding the policy for the provision of and support for the building of bungalows or other wheelchair accessible dwellings. It is important to continue to develop new social housing to high accessibility standards, providing where appropriate, lifetime home standards as well as ensuring that there is an adequate and continuing supply of wheelchair user bungalows. It is also important that social housing is built to be as flexible and adaptable as possible to ensure the widest possible range of tenants' needs can be met.

5. Electronic Assistive Technology

It is recognised that Electronic Assistive Technology (EAT) can be beneficial in supporting disabled people to undertake a range of everyday living activities within their own homes. The DSD Adaptations Guide states that these are mainly considered to be non-structural items and are therefore deemed to be the responsibility of HSCT and are not eligible for funding from the NIHE Development Programme Group. Our members have therefore been refused funding for wireless portable aids and equipment as these are not considered to be structural items. NIFHA would welcome greater clarity and a more joined up approach to the provision of EAT as new technologies are evolving which will assist housing association tenants to remain independent within their own homes.

6. Regulation & Inspection

NIFHA welcomes a regulatory system that is fair and proportionate and has the needs of tenants at its very heart. We welcome simplified systems for the delivery of housing adaptations and to support this, an over arching independent system of regulation for the provision of all adaptations services which is focussed on ensuring high standards of service are provided to service users. Housing associations are inspected by DSD to ensure that they provide an adaptation service to their tenants which corresponds with the requirements of the DSD Adaptations Guide. It is important therefore, that any changes to the adaptations process brought about by this review should also be reflected in the adaptations guide.

The development of a single adaptations system and standards of service across all housing tenures would ensure that there is equal access to adaptations for people who need them in Northern Ireland. However, the DSD Inspection team need to be aware of and support any new systems of work and service standards for the housing association movement with respect to adaptations, providing them with an assurance that they are continuing to meet their regulatory requirements.

I hope you find this consultation response useful.

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