



There's No Place Like Home:

Family Carers Ireland's submission to the Department of Housing, Local Government and Heritage on the review of the Housing Adaptation Grants Scheme

Family Carers Ireland

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Introduction

Family Carers Ireland welcomes the opportunity to submit our views to the Department of Housing as part of their review of the Housing Adaptation Grant Scheme (HAGS). The review is timely, given the rapidly rising rate of inflation, the spiralling cost of living and increases in the price of building products due to Brexit, all of which are undermining the impact and value of the scheme.

Population ageing and the increase in the number of people living with a disability or chronic condition represents one of the most significant demographic and societal challenges facing policymakers in terms of planning for the long-term care needs of the population. The number of people over the age of 65 is expected to reach 1.4 million by 2040, or about 23% of the total population while the number of people living with a disability is expected to increase by 20 per cent by 2026. These demographic changes, aligned with Government policy to rightly reorientate the delivery of healthcare towards care in the home will inevitably increase society's reliance on the HAGS, bringing with it a commensurate need for a substantial increase in funding and a reform of the policy fundamentals underpinning the scheme.

Summary of issues that should be addressed in the review

i. Adequacy of HAGS Grant Limit

Currently, the maximum grant limit under HAGS is €30,000, which can cover up to 95 per cent of approved costs of works. However, the spiraling cost of living, and building material price increases, coupled with labour shortages within the sector have contributed to record levels of building inflation, which means maximum grant limits fall far short of what is required to meet the actual costs involved in home adaptations.

Even before the cost of living crisis, figures from the Society of Chartered Surveyors of Ireland show the annual rate of construction inflation hit 13.4 per cent between January to December in 2021. An analysis by *Family Carers Ireland* through records received by FOI request in 2021 shows that the average cost of an extension is significantly more than the current maximum cap of €30,000. For example, the average cost of an extension in Westmeath rose from €56,565 in 2018 to €60,297 in 2021. Even if a family received the full Housing Adaptation Grant of €30,000, which would only be provided if the household income was below €30,000 (or €40,000 if, for example, there were two children under 18 in the household), the shortfall of almost €30,000 would have to be met by the family. This places enormous financial pressure on households already struggling to meet the additional costs associated with caring and disability.

Research by the Vincentian Partnership for Social Justice published in April 2022, shows that even before the cost of living crisis households caring for a child with a profound intellectual disability **incur additional average weekly costs of €244 compared to a similarly composed household with no disability or care needs.** The research also shows that the disadvantage experienced by caring households does not end as income increases. Even caring households with higher income levels have significantly less disposable income to meet the need for contingencies such as car or house repairs, medical expenses, or home adaptations. These families, who often rely on a single income due to their caring responsibilities, face a multitude of financial battles as they are ineligible for almost all carer supports, yet face the same crippling costs of caring without recognition or support from the State. It is untenable to think that families earning a gross household income of over €60k are considered sufficiently well-off to meet the cost of adapting their home to meet the needs of a disabled or older person, regardless of their mortgage repayments, loans, children's education expenses, and other outgoings¹.

¹ Households with a gross household income of more than €65k are also not eligible for any social welfare support.

The Departments review of the HAGs must prioritise increasing the maximum grant amount available to reflect not only the rate of construction inflation but also consider households' ability to contribute 5 percent or more to the cost of the adaptation after meeting the very substantial costs of caring and disability.

ii. Income thresholds

Family Carers Ireland believes that the income thresholds for the HAGS are outdated, inadequate and bear no resemblance to the actual disposable income of households where high-level care is provided. Because the means test is applied to gross rather than net income and does not apply disregards to mortgage repayments, dependent children, college fees, Fair Deal contributions, medical costs, etc., it does not reflect the reality faced by families who are struggling to make ends. We also believe the decision to include the income of other adults living in the household over the age of 18 if not in fulltime education, is grossly unfair and penalises older parents who due to the housing crisis have little choice but to allow adult children to remain living with them temporarily. If parents across Ireland were to evict adult children living with them in order to qualify for a Housing Adaptation Grant, there is little doubt about the impact this would have on the already deeply engrained housing crisis.

For example, a couple aged in their seventies, both in receipt of the State Pension of €253 per week would qualify for the maximum grant rate of €30000. However, if their adult child lives with them and earns €1,000 per week, they are no longer eligible for any grant

iii. Geographic disparity and departmental oversight

There is a need to address the geographic inequity in average grants awarded under HAGS, with the Irish Government Economic and Evaluation Service (IGEES) Policy Analysis of the scheme stating that *"applicants could be subject to considerable inequity based on location, in that the level of funding available to them in one authority may differ greatly from that in a neighbouring authority"*. The variance seen in the levels of grant funding provided by Local Authorities raises questions regarding the autonomy afforded to them and the inconsistencies that routinely arise in the delivery of the scheme. Despite improvement in recent years, there is evidence of failures within Local Authorities to draw down the totality of funding allocated, despite significant waiting lists which characterise the scheme. In 2021, only 94 per cent of the 2021 allocation for the Housing Adaptation Grant Scheme had been drawn down.

Table 1: Housing Adaptation funding and drawdown 2014 – 2021

Year	Housing Aid Older People €'000	Housing Aid Disability €'000	Mobility Aid Grant €'000	Total Grants	Total HAGs Drawdown €'000	Total Exchequer Funding	Drawdown	Average Grant €
2014	13,498	2,192	1,721	7,547	36,454	38,410	95%	4,830
2015	11,267	2,600	1,869	7,596	38,391	25,321	66%	5,054
2016	12,647	2,714	1,871	8,010	40,062	45,000	89%	5,001
2017	13,254	3,449	2,073	9,080	48,406	47,844	101%	5,269
2018	13,904	3,622	2,151	9,413	51,244	53,000	97%	5,630
2019	15,426	3,891	2,111	10,023	55,265	57,000	97%	5,513
2020	12,762	3,165	1,682	8,137	45,375	59,000	97%	5,575
2021	19,184	3,811	1,736	10,283	56,492	60,000	94%	5,494

*Total Exchequer funding does not include the 20 per cent contributed by the Local Authority

² <https://igees.gov.ie/wp-content/uploads/2020/02/Focussed-Policy-Assessment-of-Housing-Adaptation-Grants.pdf>

While we acknowledge the impact that COVID-19 has had on Local Authorities' ability to draw down funds, with Government restrictions curtailing the activities of authority staff, preventing Occupational Therapists from assessing applicants' homes and halting construction projects, we note however the commitments made in the 'Housing Options for Our Ageing Population: Policy Statement 2019' – still an active document – to increase the funding, review the guidelines and streamline the application process for the HAG scheme as well as publishing annual data on waiting lists, which to date have not been delivered despite having a deadline of Q4, 2019. While some early progress was noted in the First Report of the Implementation Group overseeing the Policy Statement, including initial work on a revised application form and a review of waiting lists, no further progress has been reported, nor has the new application form been operationalised.

iv. Application process and waiting times

There is currently no guidelines on how long a person with a disability or an older person should have to wait for a decision on their application for a Housing Adaptation Grant. In 2021, *Family Carers Ireland* requested records from each Local Authority on the average processing times for the HAGS from the time of application to approval and from approval to commencement of works. While the majority of Local Authorities were not able to share these records (a significant point of note for this review), data that was shared showed that Local Authorities vary in the amount of time it takes to provide a decision, with many applicants experiencing long delays for approval and commencement of building works. While there are models of good practice across the country, with some Authorities striving to provide a decision within four weeks of receiving all paperwork, there is inconsistency in the process. This is further complicated when Local Authorities 'close' the scheme to new applicants before year-end due to funding shortages. The inconsistencies in waiting times must be addressed to ensure that there is a standard processing time limit across all Local Authorities.

Furthermore, Family Carers Ireland recommends that the Department introduce an automated application process, which would allow applications to be made and approved via an online system. Older carers or those who would prefer the paper-based application process should also be facilitated to apply using the current application process.

v. Need for a review and modernisation of the medical prioritisation system

Applications for HAGS are prioritised on the basis of medical need, ranging from *Priority 1* (a person who is terminally ill or mainly dependent on family/carer; or where alterations would facilitate discharge from hospital or alleviate the need for hospitalisation in the future); *Priority 2* (a person who is mobile but needs assistance in accessing washing, toilet facilities, bedroom etc; or where without the alterations their ability to function independently would be hindered and *Priority 3* (a person who is independent but requires special facilities to improve the quality of life e.g. separate bedroom or living space)³.

Although Government advises Local Authorities to prioritise applications based on medical needs⁴, there appears to be inconsistency across Local Authorities when it comes to the operation of prioritisation schemes. Analysis of records shows that some Authorities say they are adequately funded so have no need to operate a priority list, while others only approve those applications that are deemed emergencies due to a lack of available funding. This policy of prioritising the provision of Housing Adaptation Grants to facilitate discharge from hospitals on an emergency basis means that people in hospital can access them more easily than those living in the community. This makes it harder for those in the community—such as those with non-emergency needs—to have their care needs met. This lack of consistency across Local Authorities also leads to a postcode lottery, whereby

³ Mental ill health is recognised as not being given the same level of priority as other disabilities (Joint Oireachtas Committee July 2019)

⁴ <https://www.focusireland.ie/wp-content/uploads/2016/03/circular-housing-12-of-2014-changes-to-adaption-grant-for-older-people-and-people-with-a-disability.pdf>

some families are more likely to receive an adaptation compared to someone living in a different area. *Family Carers Ireland* believes the operation of a medicalised prioritisation system is problematic on a number of grounds, not least of which is delaying a person with less urgent medical needs access to a grant, even though it would greatly improve their quality of life. To this end, we recommend a fundamental review of the medical prioritisation approach towards a system which is designed and funded to meet the needs of all older people or people with a disability (subject to means testing) whose quality of life would be improved if their home was adapted to meet their needs.

vi. Exchequer Funding for HAGS

The Programme for Government commits to ‘maintaining support for the Housing Adaptation Scheme’ - a more modest commitment than that made by the previous Government which sought to ‘invest significantly in the scheme’. That said, funding for HAGS has increased modestly since 2020, albeit funding levels have never recovered to their peak of €77m in 2010. While average grant values have remained relatively stable, this should be considered in relation to inflation and the significant increase in the cost of building products. While it has improved in recent years, there is evidence of failures within Local Authorities to draw down the totality of funding allocated to them, despite waiting lists for the scheme.

We note the more recent commitment contained in the Housing for All strategy (2021) to review the Housing Adaptation Grant Scheme (objectives 6.4/7.4) and the Minister’s confirmation this will include a review of the existing grant limits and income thresholds and will be undertaken in 2021⁵. While welcome, it is disappointing that this review originally committed to in 2019 is only now underway.

With regard to the target set in Rebuilding Ireland to achieve a 10,000 Housing Adaptation Grants drawdown in 2017 (p. 96), we note that this ambition was reached only once during the last decade in 2019. However, we accept that the failure to achieve the target since 2020 can be attributed to the ongoing restrictions associated with COVID-19.

vii. Disabled Persons Grant Scheme

In our work with family carers across Ireland, we note growing frustration amongst older people and people with a disability who are tenants in Local Authority properties and who despite having very significant mobility and health needs, cannot secure an adaptation of their home through the Disabled Persons Grant Scheme. There also appears to be considerable confusion regarding how the scheme is administered and where tenants can seek recourse or make an appeal when despite years of waiting, funding is not provided for the adaptation of their home. We note that funding for the Disabled Persons Grant Scheme and Improvement Works in Lieu of Local Authority Housing Scheme has increased from €15,075,000 in 2019, to €23m in 2021, however, we will closely monitor the progress of the implementation of this funding over the coming months.

viii. Provision of essential care equipment including ceiling hoists

In responding to a parliamentary question on May 31st 2022⁶, the Department of Health confirmed that in late 2020 the Department of Housing, Local Government and Heritage offered guidance to local authorities that fixed ceiling-track hoists should not be included in the Housing Adaptation Grants scheme. The Minister for Health noted that *‘the Department did not consult with the Department of Health and/or the Health Service Executive at the time, prior to making the decision to remove funding. The HSE became aware of this in April 2021 and engagement is ongoing between the Department of Health, the HSE, and the Department of Housing, Local Government and Heritage in relation to this matter – with a view to resolving the difficult issues involved as soon as possible and ensuring that*

⁵ Response to Parliamentary Question 47287/21.

⁶ PQ reference 27538/22

people receive the services they require'. The unliteral decision to remove funding without ensuring that another Government agency could take over the funding of these items has caused considerable distress to many people who can no longer access a service that they require to meet their health and safety needs. *Family Carers Ireland* trust that this issue will be addressed and fully resolved through this review process, with funding for ceiling hoists fully reinstated.

In Conclusion

Ireland's demography is changing with the old-age dependency rate predicted to significantly increase in the coming years, which will inevitably increase the reliance on the HAGS and bring with it a commensurate need for an increase in funding. The commitment to 'maintain' rather than increase funding for the scheme is, therefore, an inadequate policy response. Rather, funding for the scheme should increase in line with demographic demand, with the scheme reviewed to address existing anomalies and operational issues.

Family Carers Ireland agrees with the recommendations made in a Policy Analysis of the Housing Adaption Grant Scheme in 2020 including the need to align the scheme to demographic projections, the opportunity for greater efficiencies through the use of technology and the need to streamline administration processes and data collection across all Local Authorities. Of particular importance is the need to address the geographic inequity in average grants awarded under the scheme. The variance seen in the levels of grant funding provided by Local Authorities raises questions regarding the autonomy afforded to Local Authorities and the inconsistencies that can arise in the delivery of the scheme.

In light of rising inflation, the spiralling cost of living and price increases in building products due to building inflations, we believe this review should lead to an increase in maximum grant limits; an increase in income thresholds as well as a broader range of disregards and put an end to the unfair assessment of the income of other adults living in the household not in full-time education.

About Family Carers Ireland

Family Carers Ireland is the national charity dedicated to supporting the 500,000 family carers across the country who care for a loved one, including children or adults with physical or intellectual disabilities, frail older people, those with palliative care needs or those living with chronic illnesses, mental ill-health or addiction. Our vision is an Ireland in which family carers are properly recognised, supported and empowered.