
NATIONAL FEDERATION OF VOLUNTARY BODIES

Providing Services to People with Intellectual Disability

National Federation of Voluntary Bodies



Social Housing Submission to the
Department of Environment,
Community and Local Government

July 2014

Executive Summary

There is a cohesive international, European and Irish policy context for people with disabilities that converges on the principles of full citizenship for people with disabilities, inclusion in the community and choice about where and with whom people live.

However, in spite of the rich policy landscape supporting choice and access to living in community the reality remains that many people with disabilities in Ireland do not have choice in where and with whom they live and do not use mainstream housing options. This includes over 3,200 people currently living in Congregated Settings (defined as settings where more than ten people reside) and many more living together in settings with high numbers of people, or living as adults in the family home when this is not the individual's choice.

During times of economic prosperity, there was pervasive inequality for people with disabilities in terms of accessing housing, moving out of poverty and living self-determined lives. This highlights the importance of the implementation of specific measures to ensure that people with disabilities have access to housing on an equal basis to other citizens, particularly in times of economic hardship.

The current crisis in the supply of social housing and the recession in general have slowed the pace of change for people with disabilities, in particular those with high support/complex needs.

In this submission the member organisations of the National Federation have provided feedback on the workings of current processes related to social housing provision for people with disabilities. The cross-departmental working taking place under the National Housing Strategy for People with a Disability 2011-2016 is very welcome, as is clear guidance on the assessment process and the development of Easy to Read materials. Some key issues in the current process were also identified, including the following:

- a lack of supply of suitable housing;
- issues with Rent Supplement including the caps and affordability, and the needs of people who do not have legal capacity to rent on their own behalf;
- difficulties with the leasing model for people with disabilities;
- the need for a clear funding mechanism to support people with disabilities, and in particular people with complex needs moving into mainstream housing;
- unintended consequences of the implementation of HIQA Regulations and in particular difficulties associated with moving into temporary or emergency accommodation;
- a need for clarity regarding fire safety standards; and
- the need for Capacity legislation to be enacted.

The 5-year Social Housing Strategy provides an opportunity to ensure the full inclusion of citizens with intellectual disabilities. The Strategy can provide renewed focus and drive in achieving the aims of national and international policies.

It is essential that the National Housing Strategy for People with a Disability 2011-2016 and the proposed 5-year Social Housing Strategy do not become parallel processes, but work in an integrated manner. Tackling the supply issues within the 5-year Social Housing Strategy and applying universal design principles will be key drivers of the sustainable achievement of the goals of the National Housing Strategy for People with a Disability 2011-2016.

The marrying and coordination of these two Housing Strategies with the work of the Value for Money Implementation Framework and the regulation of residential supports for people with disabilities in a cohesive way will be of central importance in ensuring transition for people currently living in Congregated Settings and in providing people with disabilities choice and inclusion in their living options in Ireland in the coming years.

Recommendations

Specific recommendations are provided in this submission, summarised as follows:

1. Equal citizenship, freedom of choice and inclusion for all should be central to the guiding principles at the heart of the 5-year Social Housing Strategy.
2. Measures to ensure that people with disabilities have equitable access to social housing must be a central feature of the Social Housing Strategy being prepared.
3. It is critical that the National Housing Strategy for People with a Disability 2011-2016 is embedded and integrated into the 5 year Social Housing Strategy, in particular to address the issue of supply.
4. A development process is urgently needed to re-establish supply of social housing. In the development process it is essential that there is ring-fenced availability for the social housing needs of people with disabilities.
5. In order to meet the considerable shortage of social housing and in particular housing that can be accessed by people with disabilities, the 20% percentage requirement of housing reserved for social housing under Part V of the Development Acts 2000-2002 must be maintained. This percentage must be delivered as units rather than as a cost contribution.
6. The unintended consequences in the lack of cohesion between current policies and legislation, which are causing significant barriers for people with disabilities, and in particular people with complex needs to accessing mainstream housing, should urgently be addressed, particularly the barriers caused by the unavailability of leasing as an option for many people with disabilities.
7. There should be an option, where appropriate, for people with disabilities and their families to part-fund social housing in collaboration with the Local Authority.
8. There is a need to ensure that all social housing initiatives focus on best practice and avoid the risk of the development of new mini-institutions.
9. For the agreed policy direction for people with a disability to be realised - i.e. the inclusion of people in community living with choice and full citizenship, there must be collaboration between the following processes and bodies:
 - National Housing Strategy for People with a Disability 2011-2016 Housing Sub Group
 - Value for Money Implementation Working Groups
 - HIQA
 - The Social Housing Strategy that is the subject of this consultation process

- Local Authorities, Service Providers, Approved Housing Bodies, NAMA, banks and developers and national advocacy groups
10. The enactment of the pending Assisted Decision-Making (Capacity) Bill 2013 is urgently required.
 11. Part M of the building code should be reviewed to ensure adequate and comfortable access is provided for by the regulations. The Social Housing Strategy should adopt the Universal Design Guidelines currently being prepared by the National Disability Authority.
 12. There should be a continued focus on the creation of Easy to Read materials for all application forms and information provision related to housing.
 13. Consideration needs to be given to and clear pathways developed for meeting the housing needs of people with disabilities currently living in the family home or group homes who wish to move into social housing, and those who are coming of age; both for planned transitions and emergency provision.
 14. There is a need to acknowledge the reality that it costs more to house and support people with more significant needs, and to build in clear funding streams and pathways that can ensure that significant need does not mean that people with complex needs are unequally served under the Social Housing Strategy.
 15. Monitoring should take place to ensure that in the transition from health-related provision, at a minimum, there is no funding reduction in meeting the housing needs of people with disabilities.
 16. There is an urgent need to have Resource Allocation Models and individualised funding models as envisaged by the Value For Money report approved so that we can move from a block-funded system, to allow individualised choice and funding based on the needs of the person.
 17. A balanced, nationally consistent, person-centred approach is urgently required to standardise the approach to fire safety regulations across Local Authorities. The implementation of the standards must recognise the differing needs and individual choice of people as they live within their own homes in a domestic environment.
 18. Risk must be positively viewed and the implementation of HIQA regulation requires calibration to ensure an overview of the person's quality of life, access to choice and inclusion. It is important that the regulation is suitable for domestic settings rather than focusing primarily on health and risk-related issues potentially more applicable to a nursing home/ medical model.
 19. The use of EU Funding streams should be maximised in terms of both moving people from Congregated Settings and in preventing back filling of Congregated Settings, by providing clear pathways to community living for people reaching adulthood and for those already living in community settings with changing needs. The goals of Europe 2020 are not being met for people with disabilities. Therefore all Government Departments should prioritise the use of, and application for, European funding over the coming 5 years with the aim of supporting the amelioration of the gap between housing provision for people with disabilities and those without.

1. Introduction

The National Federation of Voluntary Bodies Providing Services to People with Intellectual Disability (National Federation of Voluntary Bodies) is the national umbrella organisation for voluntary/non-statutory agencies who provide direct services to people with intellectual disability in Ireland. Our 58 Member Organisations provide supports to approximately 22,000 people with intellectual disability and their families in the Republic of Ireland and account for in excess of 85% of this country's direct service provision for people with an intellectual disability.

Vision Statement of the National Federation:

The National Federation of Voluntary Bodies Vision Statement for Intellectual Disability in Ireland for the 21st Century, outlines its vision as:

“Being supported to live a life on one's own terms - Above all people have a deep and rooted desire to belong, to be in relationship, to live within the intimacy and security of their family and friends, to be included in the greater life around them and all its attendant possibilities for hope and fulfilment and to do so, to the greatest extent possible, on their terms. The implications of this simple truth will determine our actions on behalf of all citizens with Intellectual Disabilities”

The services provided to people with an intellectual disability are founded on the values as set out in the O'Brien (1997) Principles of Inclusion, Choice, Dignity, Respect, Participation and Contribution. They are rooted in the rights based perspective that people with intellectual disability have the right to live full and active lives, and be active participating members of their own community.”

National Federation (2009)

2. The National Federation's response to the call for submissions on a 5 year Social Housing Strategy

Under Section 8 of the Government's recently published “Construction 2020 - A Strategy for a Renewed Construction Sector”, a 5-year Social Housing Strategy is to be published by Q3 2014. The National Federation of Voluntary Bodies warmly welcomes the development of a Social Housing Strategy and the opportunity afforded to input into the process of development through the current round of consultation.

The National Federation consulted with its members through a range of processes in order to develop this submission, including through a focus group of member organisations and through individual meetings with, and submissions from, member organisations focusing on supporting individuals to access community living options.

3. The importance of a social housing strategy to people with a disability in Ireland

In an effort to achieve the goals of inclusion and self-determination for people with disabilities, it is important to be aware of the policy context and to monitor the actual impacts on the ground of implementation of the relevant policies, which can be both positive and negative. For this reason the policy context relating to people with disabilities and housing is set out below.

Internationally, there is recognition that people with disabilities have struggled disproportionately to live included lives in the community and to enjoy the full recognition of their rights and citizenship. This recognition crystallised in the development of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in 2006. The Convention, to which Ireland is a signatory¹, states under Article 19 (Living independently and being included in the community) that:

“States Parties to the Convention recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including by ensuring that:

(a) Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement;

(b) Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;

(c) Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.”

(UNCRPD, 2006 Article 19)

European policies echo the need to redress the imbalance in the achievement of full citizenship on the part of people with disabilities. The EU recognises that for people with disabilities the rate of poverty is 70% higher than the average (partly due to limited access to employment), and has adopted a ten-year strategy (European Disability Strategy 2010-2020: A Renewed Commitment to a Barrier-Free Europe) to improve the social and economic situation of people with disabilities and to further the implementation of the UNCRPD. The Treaty on the Functioning of the EU (TFEU) requires the Union:

“...to combat discrimination when defining and implementing its policies and activities (Article 10) and gives it power to adopt legislation to address such discrimination”

(EU, 2010, p.3).

In this context it is essential that the needs of people with disabilities are provided with a clear focus within the 5-year Social Housing Strategy currently being developed.

The EU recognises that the full social and economic inclusion of people with disabilities is essential to building a wider sustainable, inclusive society. Inclusion of people with disabilities brings about market opportunities and fosters innovation. The estimated €30 billion market in the EU for assistive devices, for instance, is an area with considerable growth potential, particularly given that many goods, services and built environments are not at this time accessible. A specific goal of the European Disability Strategy 2010-2020 in Article 6 - Social Protection, is the key action area to ‘*Promote decent living conditions for people with disabilities*’ (p.8). Within this goal the Strategy acknowledges that the lower participation in the labour market of people with disabilities leads to income inequalities and poverty in addition to social exclusion and isolation. For this reason the Strategy recognises that it is

¹ Ireland has signed the UN Convention on the Rights of Persons with Disabilities but is unable to ratify the Convention until capacity legislation is enacted.

essential for social protection and poverty reduction programmes, public housing programmes and other enabling services, to be focused on supporting the needs of people with disabilities.

Irish policy

The overarching aim and direction of current policy in Ireland with respect to people with disabilities is for people to enjoy equal citizenship, self-determination and choice in order to live included lives in the community.

The vision for social partnership at a national level as set out in the Social Partnership Agreement ‘Towards 2016’ is a vision of an Ireland where people with disabilities have, to the greatest extent possible, the opportunity to live a full life with their families and as part of their local community, free from discrimination. To achieve this vision, the Government and the social partners are committed to working together towards long-term goals with a view to continued improvements in the quality of life of people with disabilities including the goal that:

“Every person with a disability would have access to public spaces, buildings, transport, information, advocacy and other public services and appropriate housing”

(Towards 2016, p.66).

The overall policy focus of ‘Towards 2016’ is the building of an inclusive and sustainable economy and society. A lifecycle framework is adopted with respect of people with disabilities in order to place the needs of this cohort at the centre of policy development and delivery, by assessing risks facing the individual and the supports available to them to address those risks at key stages in the individual’s life. ‘Towards 2016’ identifies the National Disability Strategy as a comprehensive strategy for the implementation of these policy goals and indicates that its implementation should be the focus of policy over the lifetime of the agreement with respect to people with disabilities.

The National Disability Strategy includes the Disability Act 2005, six Sectoral Plans from a variety of Government Departments, the Education for Persons with Special Educational Needs Act 2004, the Comhairle (Amendment) Bill 2004 and a Multi-Annual Investment Programme. As outlined in the Social Partnership Agreement ‘Towards 2016’, the Department of Environment, Community and Local Government is one of the six Government Departments tasked with producing sectoral plans to mainstream the provision of supports to people with disabilities within the wider social supports available to all citizens.

As a key deliverable under the Social Partnership Agreement with respect to providing appropriate housing for people with disabilities, the Department of Environment, Community and Local Government developed the *National Housing Strategy for People with a Disability 2011-2016* in consultation with the Department of Health, the Department of Public Expenditure and Reform, and HSE. The vision of the Strategy is:

“To facilitate access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustained manner, which promotes equality of opportunity, individual choice and independent living”

(DECLG, 2011, p.7)

The Strategy provides a framework for the delivery of housing for people with disabilities via mainstream housing policy through nine strategic aims as outlined in Figure 1, below. Importantly, the Strategy seeks to:

“...direct the efforts of housing authorities and the HSE to support people with a disability to live independently in their own homes, with accommodation designed and/or adapted as fit for purpose, rather than having to move into residential care settings.”
(DECLG, 2011, p.4)

Strategic Aims of the National Housing Strategy for People with a Disability 2011-2016:

1. To promote and mainstream equality of access for people with a disability to the full range of housing options available suited to individual and household need.
“In particular, newer delivery mechanisms such as the Rental Accommodation Scheme and the Social Housing Leasing Initiative will be examined to ensure that their potential is fully maximised.” p.8
2. To develop national protocols and frameworks for effective interagency cooperation which will facilitate person-centred delivery of housing and relevant support services.
3. To support people with a disability to live independently in their own homes and communities, where appropriate.
4. To address the specific housing needs of people with an intellectual and/or physical disability, moving from congregated settings in line with good practice, including through the development of frameworks to facilitate housing in the community.
5. To address the specific housing needs of people with a mental health disability, including through the development of frameworks to facilitate housing in the community, for people with low and medium support needs moving from mental health facilities, in line with good practice.
6. To consider good practice in the design, coordination and delivery of housing and related supports.
“... a focus on a number of key areas, including, design of housing, person-centred responses, information provision and interagency co-operation.”
7. To facilitate people with a disability to access appropriate advice and information in respect of their housing needs.
“The provision of information, advice and advocacy are key components to facilitate equality of access to housing and related support services”
8. To improve the collection and use of data/information regarding the nature and extent of the housing needs of people with a disability.
9. To provide a framework to support the delivery, monitoring and review of agreed actions.

Figure 1. Strategic Aims of the National Housing Strategy for People with a Disability 2011-2016

The Strategy also supports the Programme for Government commitment to promote universal design whereby all environments can be used to the greatest extent possible by all people, regardless of age, ability or disability. An Implementation Framework for the National Housing Strategy for People with a Disability 2011-2016 was published in July 2012 (DECLG). Under this Implementation Framework a

Housing Sub Group was established led by the Housing Agency, to coordinate implementation of the Strategy. The National Federation plays an active role in the Housing Sub Group and warmly welcomes the cross-departmental collaboration at the heart of the Implementation Framework, and the opportunity to contribute to the implementation of this important Strategy.

In addition to the National Housing Strategy for People with a Disability 2011-2016, a key policy initiative relevant to the provision of housing for people with disabilities is the Value for Money and Policy Review of Disability Services in Ireland (2012). An Expert Reference Group was convened to facilitate and support a policy review in the context of the overall Value for Money (VFM) review of the efficiency and effectiveness of disability services funded from the Health Vote. The review proposes a fundamental shift from group-based service delivery models to supports that are person-centred and individually chosen. The Disability Policy Review sets out the vision of the Government with regards to services accessed by people with disabilities in Ireland, *“To contribute to the realisation of a society where people with disabilities are supported, as far as possible, to participate to their full potential in economic and social life and have access to a range of quality personal social supports and services to enhance their quality of life and well-being”* (p.xxvii). This vision is supported by two key goals:

- 1) Full inclusion and self-determination for people with disabilities through access to the individualised personal social supports and services needed to live a fully included life in the community, and;
- 2) The creation of a cost-effective, responsive and accountable system which will support the full inclusion and self-determination of people with disabilities.

A National Implementation Framework for the Value for Money and Policy Review of Disability Services was established with the Health Services Work Plan 2014 providing for six Working Groups;

- Person-centred model of services & supports - strategic planning
- Person-centred model of services & supports - implementation, oversight & support
- People with disabilities and community involvement
- Quality & standards
- Management & information systems
- Governance & service arrangements

Regulation of Residential Services for Children and Adults with Disabilities

Since 1st November 2013 the Health Information and Quality Authority (HIQA) is responsible for the registration, inspection and monitoring of all centres providing residential services to people with disabilities (including respite).

The aim of the HIQA Standards is to ensure good quality, safe residential services for children and adults with disabilities. The standards are based on key principles to guide providers on providing a safe and effective service.

The integration and coordination of the work of the Value for Money Implementation Framework, the roll-out of the National Housing Strategy for People with a Disability 2011-2016, the implementation of a 5 year Social Housing Strategy and the regulation of residential supports for people with disabilities in a cohesive manner will be of central importance in progressing the transition to providing people with disabilities choice and inclusion in their living options in Ireland in the coming years.

4. Current issues for people with disabilities in Ireland regarding housing

Returning to the rationale outlined above for the development of the United Nations Convention on the Rights of Persons with Disabilities (2006) and subsequent European and national policy initiatives; as discussed these were developed based on significant evidence internationally that the rights of people with disabilities have not been enjoyed to the same extent as people without disabilities. The available evidence confirms a lack of equality in the enjoyment of full citizenship and human rights for people with disabilities in Ireland, including in the living options being experienced by people with intellectual disabilities.

A Working Group on Congregated Settings was established in 2007 by the HSE to develop a national plan and associated change programme to support people moving from Congregated Settings to community living in line with Government Policy. The 'Time to Move On from Congregated Settings' Report (HSE, 2011) found that there were 4,000 people living in Congregated settings...

"...separate from communities and without access to the options, choices, dignity and independence that most people take for granted in their lives."

(HSE, 2011. p.3)

The vast majority of those included in this number had been living in Congregated Settings for at least 15 years at the time of writing of the report. The report defined a Congregated Setting as one in which ten or more people lived together. As of the end of 2013 there were 3245 individuals remaining in Congregated Settings (HSE). In addition to these individuals living in settings where there are ten or more people, there are many more living in settings with high numbers residing together but below the threshold of ten.

The 'Time to Move On from Congregated Settings' Report recommended a seven-year implementation plan and acknowledged the need for transitional funding to support the movement during the process of closing of the Congregated Settings. It also recognised that differing levels of need lead to differing costs per person in order to meet individual housing and support needs. The Working Group on 'Person-centred model of services & supports - Implementation, Oversight & Support' under the Value for Money Implementation Framework has established a sub-group in June 2014 focused on implementation of the 'Time to Move On from Congregated Settings' report, chaired by Ms. Breda Mulvihill from the HSE. In each of the two years 2013 and 2014 the Department of Health transferred €1million to the Department of Environment, Community and Local Government in revenue funding to support 150 people per year to move from Congregated Settings into mainstream housing options. This took place as part of the National Housing Strategy for People with a Disability 2011-2016. Whilst there have been successful transitions using this funding, the process has met with a range of barriers which will be explored further in Section 6. These barriers have led to slower progress than anticipated and challenge the seven-year timeframe set out in the 'Time to Move On from Congregated Settings' Report.

The lack of choice in housing provision is not confined to people with disabilities living in Congregated Settings. Whilst many people have chosen to live with parents and family members into adulthood or in group homes, for many more people in these situations they have not had the opportunity to choose where and with whom they live.

Towards the end of the ‘Celtic Tiger’, the NDA examined the relative achievement of equality of people with disabilities in Ireland. The results summarised in Figure 2 across a range of outcomes confirm that the rising tide had not lifted all boats. Adults with disabilities were significantly more likely to live with their parents into adulthood or to live in care than those without disabilities.

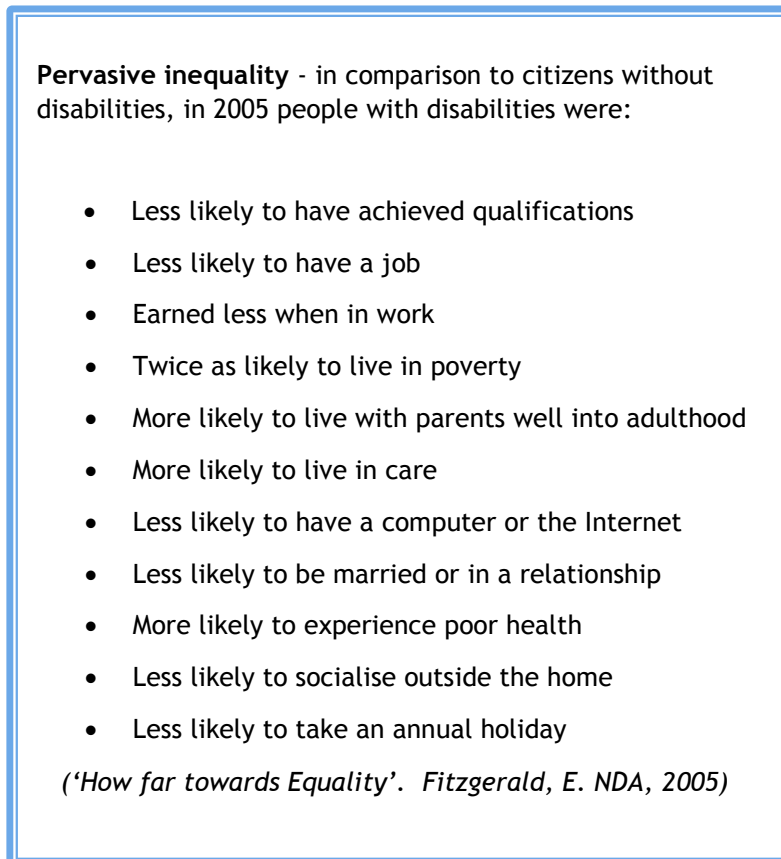


Figure 2: Pervasive inequality, NDA 2005

The voice of people with intellectual disabilities is central to any discussion of the lived experiences of those with disabilities. In a national study carried out by the Inclusive Research Network of peer-researchers in 2010, the findings of the researchers with intellectual disabilities contrasts sharply with the lived experiences of people who do not have disabilities:

“More than half of the people did not choose who they live with and only half of the people chose where they live”.

(“Where we live” Inclusive Research Network 2010, p.2).

The majority of those surveyed (N=43), who were between 20 and 50 years of age, lived with their families; some lived in group homes and a small number in independent living apartments. The people living in groups homes on average said that they lived with nine people. A small number shared their bedrooms, and 65% of those surveyed did not have a key to their bedroom.

For older people with intellectual disabilities the Intellectual Disability Supplement to The Irish Longitudinal Study on Ageing (IDS-TILDA, 2011) surveyed a total of 753 people with ID representing 8.9% of the population of people with ID over the age of 40 years. The study found that the majority of adults with an ID reported that they had limited choice in relation to how they lived their lives. Three quarters (75.4%) reported having no choice in relation to where they lived, and 85% reported having no choice in who they lived with. The report concluded:

“...that societies have done a better job of increasing the community presence of people with ID than facilitating opportunities to actually live within the community. Given that those currently living in community settings tend to be younger, this does not bode well for community participation as people age and experience health decline. There is an urgent need to develop sound policies and practices to better facilitate the participation of people with an ID in the life of their communities”

(IDS-TILDA, 2011. p.3)

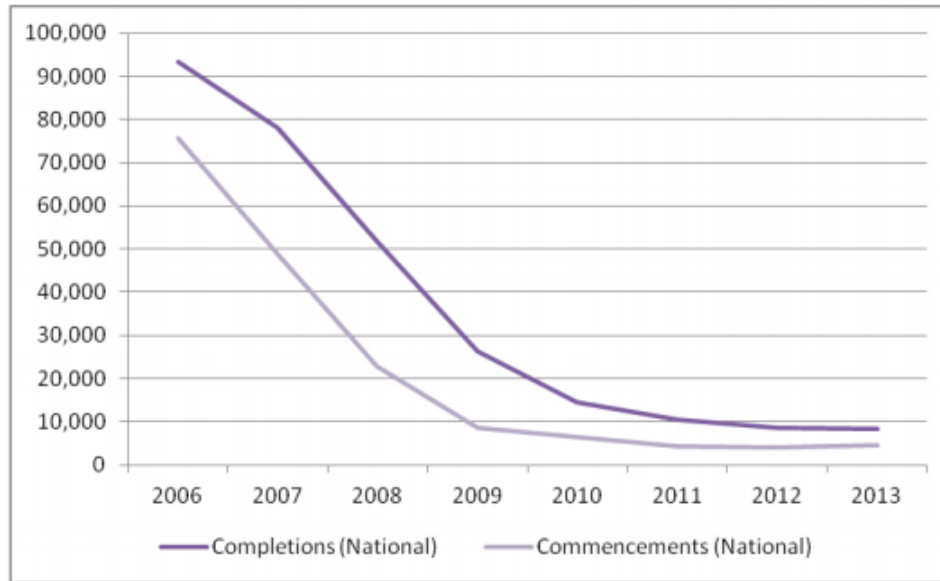
The National Federation of Voluntary Bodies is progressing initiatives to support the movement to independent living and individualised supports, including through the [Next Steps Project](#), [Immersion Project](#), [Implementation of National Policy Sub Committee](#), and working closely with the Housing Sub Group and newly established VFM Working Groups, in addition to individual initiatives being undertaken by member organisations to support people moving to community settings and accessing mainstream housing options. However, a number of key barriers are affecting the pace of change, including the lack of supply of suitable social housing in the community, the unsuitability of the leasing model in practice for people with disabilities, the need for a Resource Allocation Model and individualised payments, budget restrictions and limitations in the flexibility available in terms of staff recruitment, and the need for enactment of Capacity Legislation.

5. Current issues in social housing supply

There is an acute shortage of supply in availability for social housing being experienced at this time. Figure 3 below, from ‘Construction 2020’ published by the Government in May 2014, demonstrates the sharp reduction in overall housing commencements and completions between 2006 and 2013. At the same time there has been a significant increase in the number of people requiring social housing due to increased unemployment over the past number of years.

The requirement for residential units over the next 5 years is conservatively estimated by the Housing Agency (Housing Agency, April 2014) to be 79,660 units to support the population in urban settlements between 2014 and 2018. (This figure does not include ‘pent up’ demand but assumes previous demand is met in each year when considering subsequent year’s requirements). The Summary of Social Housing Assessments published in December showed that 89,872 households were assessed as qualifying for housing support as of May 2013 (Construction 2020).

National Housing Commencement and Completions 2006-2013



Source: DECLG

Whilst the difficulties currently being experienced on the supply side to meet this requirement pose significant challenges nationally, it is also possible to see opportunities within the current housing shortages. There is an opportunity to ensure that universal design principles and accessibility can be built in as a requirement in any new developments. It is vital that accessibility is a key deliverable in all new developments and refurbishments, to ensure the best value for investments and sustainability of solutions developed. This will provide cost savings to the community at a later stage as populations age and disability increases (as the universal design will ensure reduced need for adaptations), will make life easier for people with young children and will build inclusive communities.

The composition of households is showing a trend towards single-person households, 57% of households required over the next 5 years in the Dublin region being for 1 and 2 person households. Three quarters of all households over the next 5 years are expected to be required for households of three persons or less (Housing Agency, April 2014). Nationally, there are some areas that currently have sufficient housing to meet demand, whilst many other areas (e.g. Dublin, Galway, Cork, Kilkenny, Waterford, Drogheda, Dundalk, Athlone, Ennis and others) have either immediate shortfalls in housing availability or will shortly experience requirements. It is important to note that a large proportion of the people with disabilities that will be accessing mainstream housing options will also require housing for three people or less and it is essential that they are enabled to access these options on an equal basis with those who do not have disabilities. This will require focused measures to remove existing barriers.

6. Views of the National Federation members with respect to current issues in housing for people with disabilities in Ireland

The National Federation member organisations provided feedback on the workings of the current processes in relation to providing housing for people with intellectual disabilities. This feedback is presented below:

Areas working well in the current process

- Cross-departmental working that is taking place under the National Housing Strategy for People with a Disability 2011-2016 is very beneficial and welcome. The members particularly appreciate the open communication process with the Project Manager from the Housing Agency, Claire Feeney, and have found this very helpful.
- Regional seminars recently organised bringing together different stakeholders were welcome. This kind of networking is good practice - it is helpful that all stakeholders will be aware of the new guidance and the strategy when working together to meet the housing needs of people with disabilities.
- The development of Easy to Read material has been very beneficial and is a vital tool for supporting people with intellectual disabilities to access housing options.
- Rent supplement is working in some areas and has improved greatly in one particular area.
- The new comprehensive guidance on the assessment process for meeting the housing needs of people with disabilities is welcome.
- In cases where people have been successful in accessing housing through mainstream options it has had positive outcomes for the individual and has often been a catalyst for increased independence and self-determination in a range of areas of life in addition to housing provision.
- Increased fire standards are safer for people with mobility challenges - standardisation in public places will be of real benefit.

Key issues in the current process

- The supply of suitable housing in the community is a key barrier to accessing mainstream housing options for people with disabilities.
- The leasing model is not working in its current form for the majority of people supported by our members:
 - Most landlords do not wish to allow adaptations to be made to their properties. Landlords require property to be returned to original state following the end of the lease leading to poor value for money on adaptations made
 - Many landlords are not willing to accept tenants with Rent Supplement and are unwilling to accept tenants with disabilities
 - Leases have been ended in many cases. (For some of our members rental properties were either already part of NAMA or subsequent to the beginning of the lease became part of NAMA.) When leases have ended tenants have been required to leave the

property at short notice as the properties were being sold or ran into legal difficulties. For a number of reasons this is particularly difficult for people with disabilities and the organisations supporting them; e.g.:

- i. for people who have made adaptations this has required additional capital spend to adapt alternative accommodation
 - ii. for people whose accommodation is the subject of HIQA inspection, there are current difficulties in moving quickly to new premises due to the requirement for the new property to be registered, which can only happen after all regulations have been examined and met. In the case of a temporary property, for example, which is required while adaptations are made in a new more permanent home, the time-frame to achieve this is unrealistic. Organisations have been advised that their only option may be for the person or people to move to a hotel in the interim period, which can be months, whilst other organisations have been advised that hotel accommodation is not an option.
 - iii. In terms of leasing, the lack of certainty and security brought about by privatisation of social housing support is hugely problematic for many people with disabilities and in particular for people with Autism
- Issues with Rent Supplement:
 - The lack of supply in urban areas and in particular in Dublin is pushing the price of renting out of reach of people on Rent Supplement. In spite of the advice of Minister Burton's indication that there is scope for the Rent Supplement cap being raised where necessary in the case of a person with a disability (Answer to Parliamentary Question 133, 13 November 2012, Ref 49856/12) the experience on the ground of our members is that this is not being implemented at a local level. A short case study is included in Appendix I - Case Study 1.
 - For people with disabilities the cost of living is becoming unaffordable on Rent Supplement, as many are already living on the absolute minimum - it is very difficult to make ends meet if the individual has any additional needs and is paying rent.
 - For people who are not in a position to be supported by an Approved Housing Body and the service provider is paying the rent, Rent Supplement is not allowable, which discriminates mostly against those with higher support needs who do not have capacity to rent on their own behalf.
 - There are some issues relevant to housing provision that have arisen in the context of the HIQA inspection process:
 - There is considerable confusion and a lack of clarity about whether a property should be considered a designated centre if a person has their own tenancy. There is a need for an unambiguous statement that identifies the various circumstances and the attending status with regards to registration, e.g. whether HIQA inspection applies when a person has the capacity to sign a tenancy agreement but requires significant supports; and the routes via which people can access mainstream housing if they do not have the capacity to sign a lease. As organisations are working their way through this issue they have indicated the need for a process to 'de-designate' centres that were previously incorrectly registered, once clarity has been brought to this issue.
 - At present there is a lack of clarity and consistency with regards to the fire safety standards which should apply in homes in which people with disabilities reside. The

HIQA Standards require the Competent Person to sign off that the house meets the relevant fire safety standards. These standards have not been specified at a national level and therefore there are inconsistencies of approach being taken in different Local Authorities. In addition, the fire safety standards that are being applied (in some cases British group home standards) are not being applied in a person-centred manner. In other words no questions were asked about whether the person who plans to live in the house is ambulant, has particular fire-safety risks, etc. This is leading to very stringent fire regulations in some cases for people who are capable of living with a high level of independence. The capital costs associated with meeting the fire safety requirements have been very considerable and are without an existing funding stream.

- The National Federation members recognise and fully endorse the need for fire and health & safety measures. However, an illustration of how the current implementation of the HIQA Standards in relation to fire safety is proving problematic is provided below by one organisation:

“Due to the fire doors we have had to install, we have one broken finger already. The fire doors are 4 times heavier than the doors we previously had. There is an issue with the relative noise caused by the fire doors closing. One man has lost connectivity with another room where previously he enjoyed leaving the door open and listening to the activity of other people coming and going. When we turn off the lights we have blue, green and red safety lights which are disturbing for people. The ability to live in a normal domestic home environment is being threatened by the stringent fire regulations - there is fine line between safety and ensuring a home environment”

- Being subject to inspection can create intrusive changes in people’s living environment e.g. large green exit signs etc. that are not part of ordinary domestic life.
- As stated above, the Regulations do not allow for movement into unregistered houses. This is causing delays for people moving both from community group homes/the family home and from congregated settings. The requirement to register a house with HIQA before moving is creating barriers for individuals, both financial and emotional. A short case study is included at the end of this document to illustrate (Anne’s story). This case study is replicated around the country in considerable numbers.
- When carrying out works on designated centres to bring the designated centre into compliance with the Standards, it is necessary to access temporary housing while making the changes. As discussed, landlords will not allow adaptations in temporary accommodation and the people supported are not permitted to move into non-registered accommodation. This also raises a question about the level of choice a person has in their temporary or new accommodation when the constraints of regulation have meant much reduced availability.
- Member organisations have indicated that they have found that the CALF Scheme (Capital Advanced Leasing Facility) seems cumbersome to progress and have indicated the need for a more accessible system. There are issues for Housing Associations in relation to the number of mortgages that they are in a position to take on.
- 2008/2009 Part M of the Building Code is not sufficient to meet the accessibility needs of many people with mobility issues; new guidance with more space allocated is required, for instance the allowance for width of doors is not currently wide enough to support comfortable

accessibility. In this context the implementation of the Universal Design guidance being prepared by the National Disability Authority should be implemented.

In the context of the current issues related to the housing needs of people with disabilities as outlined above, the National Federation warmly welcomes the National Housing Strategy as a timely and necessary national approach to meeting the social housing needs of Irish citizens.

For the following reasons this 5-year Social Housing Strategy is of particular importance to people with disabilities:

- In spite of the rich policy landscape supporting full citizenship, choice and living in community, the reality remains that many people with disabilities do not have choice in where and with whom they live and are not accessing mainstream housing options.
- All of the policies are clear and in agreement on the direction that should be taken to support people with disabilities. The housing crisis that is being experienced nationally and the recession in general, have slowed the pace of change for people.
- The social housing strategy is an opportunity to ensure that for these citizens who have lost out for reasons not of their making, their full inclusion in the strategy can ensure renewed focus and drive in achieving the stated aims of national and international policies.

This 5-year Social Housing Strategy is therefore of immense importance to people with disabilities and falls within our policy remit and our international obligations under the UN Convention on the Rights of Persons with Disabilities. The Strategy is an opportunity to ensure the thoughtful and purposeful practical measures to achieve community living and enjoyment of full citizenship for people with disabilities in Ireland, as these relate to living options.

6. Recommendations

Taking into account the policy landscape, experiences in supporting people with disabilities in accessing housing options and the challenges outlined above, the National Federation has developed recommendations for the 5-year Social Housing Strategy, laid out below

- 6.1 **Equal citizenship, freedom of choice and inclusion** for all should be central to the guiding principles at the heart of the 5 year Social Housing Strategy.

- 6.2 Achievement of equality in meeting the needs of people with disabilities did not increase during the times when funding was at its highest, and many people with disabilities have waited decades in inappropriate housing. **It is therefore essential that measures to ensure that people with disabilities have equitable access to social housing are a central feature of the Social Housing Strategy being prepared.**

- 6.3 **It is critical that the National Housing Strategy for People with a Disability 2011-2016 is embedded and integrated into the 5 year Social Housing Strategy.** The most urgent barrier facing the implementation of mainstream housing provision for people with disabilities is the supply of suitable and affordable housing in the community. Without integration between the policy and implementation facets of the Social Housing Strategy and the National Housing Strategy for People with a Disability 2011-2016, it will be impossible to address the supply issues and progress choice and inclusion for people with disabilities.

- 6.4 The supply issue is a key barrier to accessing social housing for all groups, (including those with disabilities). **Therefore a development process is urgently needed to re-establish supply of social housing. In any development work taking place it is essential that there is ring-fenced availability for the social housing needs of people with disabilities.**

- 6.5 In order to meet the considerable shortage of social housing and in particular housing that can be accessed by people with disabilities, **the 20% percentage requirement of housing reserved for social housing under Part V of the Development Acts 2000-2002 must be maintained.** This percentage must be delivered as units rather than as a cost contribution. Units should be provided that are suitable for the use of people with significant needs (it is especially important to ensure that ground floor/ bungalow units are available).

- 6.6 **The unintended consequences in the lack of cohesion between current policies and legislation, that are causing significant barriers for people with disabilities, and in particular people with complex needs to access mainstream housing, should urgently be addressed, including.:**
 - Approved Housing Bodies cannot currently lease a property to a person whose supports within the home are the subject of HIQA inspections since the requirements of the regulations remove the possibility of a legitimate tenancy under current legislation.
 - Approved Housing Bodies cannot accept a tenancy signed on behalf of third party where there are capacity issues for the person being housed. This disproportionately affects people with higher support needs, ruling them out of housing provided by Approved Housing

Bodies in most cases. Concurrently, as described above the leasing model in the private market is not suitable for the majority of people disabilities, thus further reducing the choice and avenues available to people with disabilities and in particular those with complex needs.

- The remaining option for people with disabilities and complex needs is to access CALF funding, which requires significant borrowing for the Approved Housing Body over a long period of time, and is thus also not without barriers. This leaves the person with a disability dependent on the capacity of the supporting agency rather than being free to access mainstream housing in a more individual manner as envisaged by the Disability Policy Review.

In comparison to people without disabilities and in particular for people with complex needs therefore, there is currently a disproportionate lack of choice and availability of mainstream housing options that needs to be urgently addressed. The achievement of the goals of the National Housing Strategy for People with a Disability 2011-2016 will best be accomplished when these specific issues are addressed in a cross-departmental manner.

6.7 There should be an option, where appropriate, for people with disabilities and their families to part-fund social housing in collaboration with the Local Authority. There are individuals with disabilities who have inherited part or all of a family home, individuals with assets built up through other sources including through redress and who wish to access housing, and there are families who have assets and would welcome a pathway to contributing to providing housing for their family member where possible.

6.8 There is a need to ensure that all social housing initiatives **focus on best practice** and avoid the risk of the development of new mini-institutions.

6.9 For the agreed policy direction for people with a disability to be realised - i.e. the inclusion of people in community living with choice and full citizenship, there must be **collaboration between the following processes and bodies:**

- National Housing Strategy for People with a Disability 2011-2016 Housing Sub Group
- Value for Money Implementation Working Groups
- HIQA
- The Social Housing Strategy that is the subject of this consultation process
- Local Authorities, Service Providers, Approved Housing Bodies, NAMA, banks and developers and national advocacy groups

It may be useful for oversight of this collaborative process to be provided, for instance under the auspices of the Minister for Disability, Equality and Primary Care.

6.10 **The enactment of the pending Assisted Decision-Making (Capacity) Bill 2013 is urgently required.** Without this legislation, there is a significant barrier to people with complex needs being able to access tenancy, and therefore to move into mainstream housing options. This is causing barriers to the implementation of the 'Time to Move on from Congregated Settings' report and is disempowering those who most urgently require more appropriate housing - those who are living in

institutional settings and have high support needs. Ireland has signed the UN Convention on the Rights of Persons with Disabilities (2006) and awaits the enactment of this legislation in order to fully ratify the Convention.

- 6.11 *“Accessibility is a precondition for participation in society”* (European Disability Strategy 2010-2020). The European Strategy advises the adoption of regulatory measures to ensure accessibility including the use of public procurement such as has been successfully achieved in the US (Section 508 of the Rehabilitation Act and Architectural Barriers Act). **Part M of the building code should be reviewed to ensure adequate and comfortable access is provided for by the regulations and the Social Housing Strategy should adopt the Universal Design Guidelines currently being prepared by the National Disability Authority.** This will lead to greater accessibility for all (older people and those with young children) and greatly reduced costs for adaptation in the future. The long-term availability, accessibility and choice of housing options for people with disabilities is dependent on the adoption of Universal Design principles.
- 6.12 **There should be a continued focus on the creation of Easy to Read materials for all application forms and information provision related to housing.** This will benefit not only the citizens with intellectual disabilities but also those with learning disabilities, low reading levels and the public in general who may wish to access simple materials.
- 6.13 **Consideration needs to be given as to how the housing needs of people with disabilities currently living at home in the community and those who are coming of age will be met, both for planned transitions and emergency provision.** Clear pathways are needed for all that take account of the additional pressures that individuals and family members may be under when a person with a disability and support needs is living at home as an adult. There is a large number of people living at home in need of emergency accommodation, a current waiting list is maintained by the National Intellectual Disability Database.
- 6.14 There is a need to acknowledge the reality that it costs more to house and support people with more significant needs. **Therefore there is a need to build in to the 5-year Social Housing Strategy clear funding streams and pathways that can ensure that significant need does not mean that people with complex needs are unequally served under this Strategy.** There is a need for input from all bodies regarding requirements for housing people with significant needs and appropriate timeframes in which to achieve transitions.
- 6.15 Responsibility for housing people with disabilities has moved to mainstream housing provision, i.e. through Local Authorities and the Department of Environment. **Monitoring should take place to ensure that in the transition from health-related provision, at a minimum, there is no funding reduction in meeting the housing needs of people with disabilities.** The figure of €1 million provided for 150 moving from Congregated Settings in 2014 assumes a leasing model, which is not currently working well for people with disabilities and in particular people with significant needs as outlined above. There should be engagement between the Departments of Environment, Local Authorities and Health, Service Providers, the Housing Agency, the HSE and Approved Housing Bodies around the ongoing funding need and the model of delivery for people with intellectual disabilities. This engagement should include engagement on the process for the granting of the Housing Assistance Payment in conjunction with Community Welfare and the Department of

Environment, Community & Local Government and should ensure that Approved Housing Bodies have access to resources so that they can sustainably maintain properties.

- 6.16 **There is an urgent need to have Resource Allocation Models and individualised funding models as envisaged by the VFM report approved** so that we can move from a block-funded system to allow individualised choice and funding based on the needs of the person, allowing the appropriate supports to be resourced that allow people to move into housing options in the community.
- 6.17 **A balanced, nationally consistent, person-centred approach is urgently required to standardise the approach to fire safety regulations across Local Authorities.** The implementation of the standards must recognise the differing needs and individual choice of people as they live within their own homes in a domestic environment.
- 6.18 Risk must be positively viewed and the implementation of HIQA regulation requires calibration to ensure an overview of the person's quality of life, access to choice and inclusion. **It is important that the regulation is suitable for domestic settings** rather than focusing primarily on health and risk-related issues potentially more applicable to a nursing home/ medical model.
- 6.19 **The use of EU Funding streams should be maximised in terms of both moving people from Congregated Settings and in preventing back filling of Congregated Settings, by providing clear pathways to community living for people reaching adulthood and for those already living in community settings with changing needs.** The goals of Europe 2020 are not being met for people with disabilities. Therefore all Government Departments should prioritise the use of, and application for, European funding over the coming 5 years with the aim of supporting the amelioration of the gap between housing provision for people with disabilities and those without.

7. Conclusion

National and international experience have shown that core requirements of choice in where and with whom people live have not come about as a matter of course for people with disabilities and in particular for people with intellectual disabilities, including during times of when higher levels of funding were available.

It is therefore vital that the 5-year Social Housing Strategy maintains a particular focus on ensuring that measures are implemented to counteract the imbalance including in housing provision that leads to poorer outcomes for people with disabilities when compared with people without disabilities.

Appendix I: Case Study Examples

Case Study 1

Rent Allowance from CAS funded Social Housing: Galway Example

One of the major issues facing smaller housing associations going forward is the constraints placed by the rent caps on individuals which limits the available funds for the housing association to cover such cost as insurance, audit and ongoing repairs. At present the rent allowance cap for an individual in Galway in private rented accommodation is €475 per month, for two people sharing this rises to €560 per month and it has been indicated to us that this rent allowance cap is likely to pertain to housing association accommodation also. This cap would indicate a maximum rent revenue per annum to the housing association in a 2 bedroom scenario of €6720.

Example Galway City

Rent allowance from CAS funded Social Housing Association

Accommodation for two people - house funded through CAS

Max ceiling for shared accommodation is €280 per person per month = €65 per week with the first €32 paid by the tenant

While the Department of Social Protection still reference a maximum Rent Supplement of €55 per week, this is not attainable given the application of the local rent allowance cap.

Example - Per Person, Per Week

€65 rent allowance - Less €32 (first €32 payable by tenant), leaves €33 rent allowance now available

Disability Allowance - €188 per week - Less €32 = €156 per week

In this circumstance a maximum rent per week of €65 per person could be sought, however it should be noted that with regards to individuals with Intellectual disability the first €32 each week of their Disability Allowance has to be paid towards the rent of the property. This leaves a total of €156 per week for living costs, including household utility costs such as light, heat, etc.

This also makes this type of accommodation quite restrictive for an individual with a disability compared to traditional group home model of living in terms of cost.

Private Rented / RAS and People with a Disability

From enquiries, conflicting information is available on applying for RAS, for example at a recent talk it was advised that a person does not have to be in receipt of rent supplement for 18 months to be eligible for RAS, but when a housing association asked the housing officer in the city council they advised that that still stands.

Another issue is the lack of interest of landlords in availing of RAS, or the long term leasing scheme, especially in cities. This is because they know that they can achieve higher rents than the amount these schemes provide for.

PRIVATE RENTAL

The challenges that we have found relating to private renting are as follows-

There is a lack of affordable, good quality rental accommodation available in Galway, especially one or two bedroom apartments. What is available is significantly above the rent allowance cap.

Experience of trying to relay the reality of the cost of rented accommodation versus the rent allowance cap to the Community Welfare Officer (CWO) was that they insisted that there is good quality accommodation available in Galway for within the rent allowance cap. The rent allowance cap for a

single person is €475, for two people sharing it is €280 pp., total €560. This would mean that a person would have to find suitable accommodation for within this range. The average cost of a two bed apartment is between €700-€800. The average cost of a 3 bedroom house is €800-€1000. One bedroom apartments are between €500-€700. Studio/ bedsit type accommodation is more affordable but are scarce.

Over a period of 8 months of looking for private rented accommodation for people with intellectual disability, we found 1 flat within the rent cap for a single person, and it was not fit for human habitation.

The CWO'S are unwilling to sign off on accommodation that will cost more than the rent cap as they do not want to put people into a situation where they cannot afford the extra cost of the rent, on top of bills etc. Each person has to pay the first €32 of rent per week out of their disability allowance. It also has to be said that the majority of the time the landlords state that they will not accept rent allowance.

CONCLUSION

The absence of new developments of social housing and the long waiting lists are forcing a large amount of people out into the private rental sector. This is causing rents to increase and the financial reality of renting an apartment in a Galway city is prohibitive to enabling people with disabilities to rent in the private market. The restrictive rent allowance caps and the unwillingness of many landlords to accept rent allowance are also major barriers.

Breda Crehan-Roche
Chief Executive
Ability West

Case Study 2

Anne's Story

Anne is in her 60's and is involved in a number of women's network groups in her areas. She enjoys being in peaceful and quiet environments and being able to make her own decisions. She has lived in group homes for the last 30 years and has moved 6 times in that period. She has said very clearly for the last ten years that she wants to live in her own apartment, that group homes do not suit her and that she finds them stressful. Anne is fortunate in that the organisation that supports her works closely with an approved housing association.

The Housing Association was approached and Anne's name was put on the housing list, she was assessed by the Council as having a housing need. In 2011, an apartment was found that would suit her needs. The apartment was procured through NAMA and took 2 years for the paperwork to be completed. The Housing Association were not told that the process would take two years, causing great distress for Anne.

During that time HIQA had begun to regulate disability services and therefore the apartment had to be registered. It took the organisation that supports Ann a further 3 months to complete the work HIQA requires to apply for registration. Anne is now waiting for the apartments to be inspected. The process for Social Housing to be procured through NAMA and to be registered with HIQA has now taken over two and half years. It will most likely be three years before Anne moves in and she continues to live in a group home spending her day visiting the apartment she wishes to live in.

Appendix II National Federation of Voluntary Bodies Member Organisations

- Ability West, Blackrock House, Salthill, Galway
- Ard Aoibhinn Centre, Belvedere Road, Wexford
- Beam Services, Barrow Haven, Regent Street, Bagenalstown, Co. Carlow
- Brothers of Charity Services Clare, Banner House, Clare Road, Ennis, Co. Clare
- Brothers of Charity Services Galway, Woodlands, Renmore, Galway
- Brothers of Charity Services Limerick, Blackberry Park, Ballykeeffe, Dock Road, Limerick
- Brothers of Charity Services Roscommon, Lanesbro Street, Roscommon
- Brothers of Charity Services South East, Belmont Park, Waterford
- Brothers of Charity Southern Services, Lota, Glanmire, Co. Cork
- Cairdeas Centre, Tullow, Co. Carlow
- Camphill Communities of Ireland, Ballytobin, Callan, Co. Kilkenny
- Carriglea Cairde Services, Carriglea, Dungarvan, Co. Waterford
- CASA (Caring & Sharing Association), Carmichael Centre, North Brunswick Street, Dublin
- Cheeverstown House, Templeogue, Dublin 6W
- Children's Sunshine Home / Laura Lynn, Leopardstown Road, Foxrock, Dublin 18
- Clann Mór Ltd., Clann Mór House, Commons Road, Navan, Co. Meath
- Cairde Activation Centre Ltd, Unit 5, Largy, Clones, Co. Monaghan
- CoAction West Cork, Slip, Bantry, County Cork
- Cope Foundation, Bonnington, Montenotte, Cork
- Cork Association for Autism, Greenville House, Carrigtwohill, Co. Cork
- County Wexford Community Workshop, Beelefield, Enniscorthy, Co. Wexford
- Cumas New Ross, Butlersland Industrial Estate, New Ross, Co. Wexford
- DARA Residential Services, 36 Maynooth Road, Celbridge, Co. Kildare
- Daughters of Charity Disability Support Services, St. Vincent's Centre, Navan Road, Dublin 7
- Delta Centre, Strawhall, Carlow
- Drumlin House, Cootehill, County Cavan
- Gheel Autism Service, Ballycurraghan, Maynooth, Co. Kildare
- Holy Angels Day Care Centre, Strawhall Industrial Estate, Carlow
- KARE, Newbridge Industrial Estate, Newbridge, County Kildare
- Kerry Parents & Friends Association, Old Monastery, Port Road, Killarney, Co. Kerry
- L'Arche Ireland Secretariat, Cluain Aoibhinn, Fairgreen Lane, Callan, Co. Kilkenny
- Malta Services Drogheda, Malta House, Fair Street, Drogheda, Co. Louth
- MIDWAY Services, Beechmount Industrial Estate, Navan, Co. Meath
- Moorehaven Centre, O'Brien Street, Tipperary

- Muiriosa Foundation, Moore Abbey, Monasterevin, Co. Kildare
- North West Parents & Friends Association, Holy Family Day Centre, Ballytivnan, Sligo
- Peacehaven, 1-2 Hillside, Greystones, Co. Wicklow
- Peamount, Newcastle, County Dublin
- Prosper Fingal, Strand Street, Skerries, Co. Dublin
- RehabCare, Roslyn Park, Beach Road, Sandymount, Dublin 4
- SOS Kilkenny Ltd., Seville Lodge, Callan Road, Kilkenny
- St. Aidan's Service, Millands, Gorey, Co. Wexford
- St. Catherine's Association, Newcastle, Co. Wicklow
- St. Christopher's Service, Leamore Park, Battery Road, Longford
- St. Cronan's Association, Grange, Roscrea, Co. Tipperary
- St. Hilda's Services, Grace Park Road, Athlone, Co. Westmeath
- St. John of God Community Services, Provincial Administration, Stillorgan, Co. Dublin
- St. Joseph's Foundation, Baker's Road, Charleville, Co. Cork
- St. Margaret's Centre, Moorehampton Road, Donnybrook, Dublin 4
- St. Michael's House, Ballymun Road, Ballymun, Dublin 9
- St. Patrick's Centre (Kilkenny), Kells Road, Kilkenny
- St. Vincent's Centre, St. Mary's Road, Cork
- Stewarts Care, Palmerstown, Dublin 20
- Sunbeam House Services, Cedar Estate, Killarney Road, Bray, Co. Wicklow
- WALK, 1 Longmile Road, Dublin 12
- Waterford Intellectual Disability Association, 2 Belmont Road, Ferrybank, Waterford
- Western Care Association, John Moore Road, Castlebar, Co. Mayo
- Windmill Therapeutic Training Unit, Larkins Lane, South Main Street, Wexford

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