Inter-Departmental Review of Housing Adaptions Services Final Report and Action Plan 2016

[Northern Ireland Housing Executive on behalf of Department for Social Development and Department of Health, Social Servcies and Public Safety]

Consultation Response from Fermanagh and Omagh District Council.

Fermanagh and Omagh District Council (Council) welcomes the opportunity to respond to the public consultation on the 'Inter-Departmental Review of Housing Adaptions Services Final Report and Action Plan 2016'.

Brief Background for Fermanagh and Omagh District Council

The District Council area is home to 114,992 people (as of 30 June 2014). The District Council area is Northern Ireland's largest region in terms of land mass - approximately 3,000km², or 20% of NI - and the smallest in terms of population. As a result, the population density of approximately 41 people per km² is the sparsest in NI. This is a feature of the region which also provides challenges to service delivery.

Consultation Feedback

Fermanagh and Omagh District Council (Council) believes that the Housing Adaptions Services play a vital role in helping people with disabilities to enhance and increase their independence within their home and their local communities. The Council would like to commend the inter-departmental, and indeed inter-agency work, which has taken place thus far and is very keen for this to be enhanced and built upon.

As stated, independence for people with disabilities is vital. All Government Departments and other Public Sector organisations should work towards protecting and enhancing the independence of all within our communities, including those with disabilities.

Looking at the responses to the previous consultation conducted by the Northern Ireland Housing Executive in 2013, there were a number of key recommendations made.

The Council broadly agrees with the Ministerial Statements on the importance of the services as well as the majority of the recommendations contained within the report.

The Council would however, wish to raise the issues which are outlined within this consultation response document.

Within the previous Inter-Departmental Consultation from 2013, there were nine key themes listed. Within the latest consultation, eight of these themes are replicated. Rural Proofing and Equality are now merged into one theme, whilst the theme surrounding 'advice and guidance' no longer appears as a key theme.

The Council is strongly concerned about the omission of advice and guidance, as this would be seen as key to the success of any action plan and would further recommend that this be tied into communication - not only of the action plan and its themes/targets, but also in relation to advice, options available, or other support available to people with disabilities and their families.

In relation to '**Theme 1: Closer working between statutory bodies**'. The Council fully supports the concept of partnership working, collaboration and more strategic leadership between various Government Departments, Agencies as well as the Private, Community and Voluntary Sectors.

Within the Northern Ireland Executive, it is clear that a number of various Departmental Polices affect upon this policy including: Office of First Minister and Deputy First Minister (OFMDFM), Department of the Environment, Department of Finance and Personnel, amongst others.

Along with the collaboration of the Government Departments it is essential that the views and cooperation of other statutory bodies, along with organisations from the private, community and voluntary sectors is secured.

Whilst the Council acknowledges the inclusion of the actions and outcomes within the Action Plan for Theme 1, such as the Memorandum of Understanding, other actions should be included such as:

- A protocol for sharing information.
- More co-ordinated approach to ensure that there is no overlapping or duplication.
- Sharing of resources.

The Council is also keen to stress that examples, such as those outlined above, could be mitigated with the establishment of the new Government Department which will see a merging of some responsibilities and activities.

In light of the current economic climate, the continuing reduction in budgets and consequential impact on service provision, the Council is concerned about the future of all Housing Adaptions Services. Within the current economic climate, arrangements to enhance joint working is clearly important, allowing the most effective use of resource provision.

The Memorandum of Understanding between both Departments must drive issues like those which are outlined above i.e. 'sharing of information, co-ordinated approach, and resource sharing.

It would also be very beneficial for other statutory bodies, agencies and organisations within the community/voluntary sector if the Departments, along with Northern Ireland Housing Executive, developed/updated appropriate and current guidance which could be used by all.

Theme 2: Improving Partnerships

The Council fully supports recommendation 6 which states that:

'The representation and engagement of disabled people in the decisionmaking structures should be improved and strengthened.'

The Council also commends the use of the Northern Ireland Housing Executive's Disability Forum and the fact that the various groups/organisations (HSC Board, PHA, HSC Trusts) feed into this group.

Although, the Council acknowledges that the views of the Members of this Forum are taken on board, there is a concern that the Forum only consists of 11 members and does not expressly represent specific geographic areas. The very fact that when the Forum recruited Members in April 2014, it advertised that they were underrepresented in various areas (i.e. North Belfast, South Down, Lisburn, South Antrim,) shows one of the weaknesses of having just one overarching Forum.

The Council feels strongly that both Departments, along with the Northern Ireland Housing Executive, should take a more proactive approach to interacting with people with disabilities or access requirements in the various Council Districts. For example, in the Fermanagh and Omagh District Council area, there are a number of Community Groups who work directly with people with disabilities and more effort could be put into engaging with these groups within each locality. This may even take the form of an annual/bi-annual meeting where each local group are invited to share their views, and isten to new/upcoming proposals. Not only would this benefit the local disabled community but it would also benefit the Departments and Northern Ireland Housing Executive by securing a wider, more diverse and 'localised' points of view.

Another example of further consultation to 'ensure the representation and engagement of disabled people', would be to engage with the various Accessibility Forums across Northern Ireland. Within the Fermanagh and Omagh Council District there is a very strong Accessibility Steering Group, with some Members sitting on various committees across Northern Ireland, as well as being very active in numerous local Community Groups.

The Council would welcome members of either of the Departments, or indeed the Northern Ireland Housing Executive, to attend the Council's Accessibility Steering Group in order to give presentations on upcoming issues or to obtain feedback on certain issues.

If the Departments could replicate this type of engagement across Northern Ireland, then it would truly meet, and perhaps surpass, recommendation 6 from the Draft Action Plan:

'The representation and engagement of disabled people in decision-making structures should be improved and strengthened'.

Theme 3: Case Management

The Council would like to pay particular attention to recommendation 12 under this theme, namely:

'To develop common standards for user-centred services...'

The Council supports the use of a 'user-centred' service, as there can be no place for a 'one size fits all' type of approach.

In responding to other consultations, for example the recent 'Health and Social Care: Reform and Transformation' Public Consultation and the Office of First Minister and Deputy First Minister's Public Consultation on the Age Discrimination Legislation

Both DSD, DHSSPS and the Northern Ireland Housing Executive should examine ways to continually improve their 'joint working' arrangements. All parties involved should continually be looking to improve communications and working relationships between all relevant bodies, organisations and individuals.

The Council wishes to highlight the need for transparency in the entire process, amongst the agencies, the application process and the assessment process. Applicants should know what the process will be, how long it will take as well as having a reasonable understanding of what evidence they will need to provide.

The Departments, as well as the Northern Ireland Housing Executive, should look to provide assistance where necessary to applicants. Some people with disabilities may have issues corresponding via written communication, or via verbal communications, and these individuals should have as much of an opportunity to avail of Housing Adaptions as anyone else. These individuals should also be afforded every opportunity to remain independent within their homes and for this to happen the opportunity for the provision of guidance/assistance should take place. Therefore, the Council would strongly recommend that the Action Plan includes a recommendation on 'the provision of guidance/assistance to those who need it'.

Theme 4: Resources, Procurement and Recycling

The Council commends the inclusion of recommendation 14 and 15. Anything which will communicate the number, location and types of houses which have been purposely built or adapted for people with disabilities is a very positive step. It would be most helpful if this Accessible Housing Register was to include houses in the private-rented sector, as well as attempting to communicating to all private landlords the importance of advertising and properly communicating and specialised housing adaptions.

The type of information that should be included on the Accessible Housing Register would include:

- Floor plans, room sizes/shapes, location and number of bathrooms.
- Possible future adaptability for example could a stair lift be fitted?
- Energy efficiency.
- Number of steps.

- Door and corridor widths.
- Facilities for individuals with sensory disabilities.
- Local services i.e. shops, bus stops, doctors and so forth.
- Nearby footpaths/street lighting?
- Wheelchair access / parking for disabled cars?

Fermanagh and Omagh District Council also feels that recommendation 16 and the area of 'joint/coordinated procurement' is another positive step. In the current economic climate and with the on-going pressures upon the public purse, anything that can be learned from cross sector best practice and co-ordinated procurement methods is to be welcomed.

Rural Proofing

As stated within the Action Plan, there are a number of issues which are very often unique to those who live in rural areas. For example these may include, isolation, remoteness, distance to/proximity from key services, lack of public transport as well as many others.

These types of problems are particularly pertinent for the Fermanagh and Omagh Council District, the majority of which would be classed as 'rural'. Even the larger settlements within the District i.e. Omagh, Enniskillen, Lisnaskea, Irvinestown, etc., are impacted by quite similar issues to smaller more rural areas. This may be due to the fact that they are surrounded by rural areas, local infrastructure (i.e. roads) are predominantly rural in type, there is a lack of investment compared to some other areas of similar sizing which are located closer to the larger more built-up urban areas.

Within the Fermanagh and Omagh Council District, some areas are considered to be very disadvantaged due to their 'rurality'. This is quite evident with the fact that 14 Wards within the District appear in the 'Top 50' most deprived areas within Northern Ireland with regards to 'Proximity to Services', including 5 in the 'Top 10' [statistics are provided by NISRA].

Other issues which many people in rural communities suffer from include:

- Accessibility issues.
- Financial issues.
- Social isolation issues.
- Education issues and employability issues.
- Some additional 'rural premium costs' associated with living in isolated rural communities.

One of the most important aspects for 'rural proofing' this Action Plan is the communications surrounding it. Within the Communications Strategy, it is vital that interacting with local and rural community groups is included. As previously mentioned within this response document, the Council believes that regular communication with people in rural areas should be of the most importance.

In addition, the Council believes that the partnership of organisations involved within this 'Inter-Departmental review of Housing Adaptions Services: Final Report and Action Plan' should use their influence on other Departments or organisations in an attempt to try and eradicate the difficulties associated with living in rural isolation. The partnership should therefore try to strengthen transport links, access to services, social supports and access broadband provision, all of which may create barriers and/or difficulties for people with disabilities who happen to live in rural areas.

Conclusion

To conclude, Fermanagh and Omagh District Council welcomes the opportunity to respond to the 'Inter-Departmental Review of Housing Adaptions Services: Final Report and Action Plan'.

The Council broadly accepts and supports the recommendations contained within the Consultation Documents, but would urge the Northern Ireland Housing Executive (as well as DSD and DHSSPS) to take note of the comments contained within this Consultation Response.