



Submission to the Department of Housing, Local Government and Heritage Regarding the Review of the Housing Adaptation Grants for Older People and People with a Disability

Age Action is Ireland's leading advocacy organisation on ageing and older people. Age Action advocates for a society that enables all older people to participate and to live full, independent lives

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Rialtas na hÉireann
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“I was hoping to upgrade my [windows and doors] but after getting quotations I find that the prices have gone up by more than 30% at least in the last 6 months so I cannot afford to go ahead this time. Despite been approved with a [Council] Housing Aid Grant I cannot afford the balance between the amount of the grant and the total cost of replacement.”

“I have less money at the end of the month. The strain of maintaining my house has increased my anxiety/depression and dependence on other people.”

“Plans that I have for house repairs, painting etc. are on hold at the moment due to rising costs.”

“I had plans to get more dry lining and cavity walls filled to make house warmer. Because of my savings over years I would not qualify for grants. I wanted to do this for the environmental benefits. Rising costs have made me feel I should not undertake any major costs at this time.”

Quotes from Respondents to Age Action’s Budget 2023 Survey

Context

The Programme for Government commits to supporting “ageing in place”, which means supporting people to continue to live in the communities where they have built their lives. Under this heading, the Programme for Government pledges to “Maintain support for the Housing Adaptation Grant Scheme.”¹ As such the grants should be seen as one pillar supporting the achievement of the wider government aim of ageing in place, and the grants should be better integrated with other policies that promote the same aim.

Age Action not only hears about older persons’ housing concerns in our roles providing information and as an advocacy service, but we also have direct experience of delivering housing adaptation through our Care and Repair Service.² We know from our work and from our recent research (*Agency and Ageing in Place in Rural Ireland*) carried out with UCC partners that home maintenance is a major barrier to people ageing in place.³

¹ <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>

² <https://www.ageaction.ie/how-we-can-help/care-and-repair>

³ <https://www.ucc.ie/en/iss21/researchprojects/researchprojects/completedresearchprojects/aapri/>

There are several reasons why people need to avail of housing grants, including income inadequacy, the lack of cash savings, and the onset of frailty or disability.

Most older persons have low or modest incomes, and most have low or no cash savings. For example, Ireland has the third lowest income replacement ratio among people aged 65-74 in the European Union. Ireland's rate is 38% compared to an EU average of 57%.⁴ Half of all single adults aged 65+ have an annual disposable income of less than €17,066 (€327/week). Half of couples aged 65+ have a combined annual disposable income of less than €37,863 (€726/week).⁵ More than a sixth (17.3%) of older adults (aged 65+) are at risk of poverty or social exclusion. Women (19.7%) are more at risk than men (13.9%). 42.8% of older persons (aged 65+) living alone are at risk of poverty.⁶ One survey found that half of older persons have cash savings of €5,800 or less,⁷ which implies no savings in many cases.

Overall, a third of older persons (35.2% of people aged 65+) has a disability and people are more likely to have a disability the older they are. The incidence of disability grows from around the middle of working age. There is also an accelerated increase in people aged 75 or older. At age 65, a quarter (23.3%) of people report having a disability. By age 75, it rises to a third (32.1%). By age 90, it rises further to three-quarters (74.4%). The socio-economic group of older people helps to predict disability. Just over a quarter of employers, managers or higher professionals older than 65 experience disability. In contrast, over 35% of manual workers older than 65 experience disability, rising to 42% for unskilled workers.

There is limited data available on the quality of people's homes, but for example, in 2020, more than one in eight persons aged 65+ in Ireland lived in a home "with a leaking roof, damp walls, floors or foundation, or rot in window frames or floor".⁸ See also Age Action's submission to the UN independent expert on older persons' housing adequacy.⁹

No data is available on the extent of the accessibility or inaccessibility of existing housing. Likewise, no data is available on the extent to which occupants have modified their dwellings to improve accessibility. However, there are reasons to believe that this is an important area of unmet need for older persons. Firstly, the known incidence of disability among older persons is several times greater than the level of adaptation grants and mobility grants given over a seven-year period. Secondly, anecdotally through our Information Service and Care and Repair Service, Age Action is aware of

⁴ https://ec.europa.eu/eurostat/databrowser/view/ILC_PNP3/default/table?lang=en

⁵ See income table 2.1a, <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2020/income/>

⁶ https://ec.europa.eu/eurostat/databrowser/view/ILC_LI03_custom_2468799/default/table?lang=en

⁷ <https://data.cso.ie/table/HFC11>

⁸ https://ec.europa.eu/eurostat/databrowser/view/ILC_MDHO01/default/table?lang=en&category=livcon.ilc.ilc_md.ilc_mdho

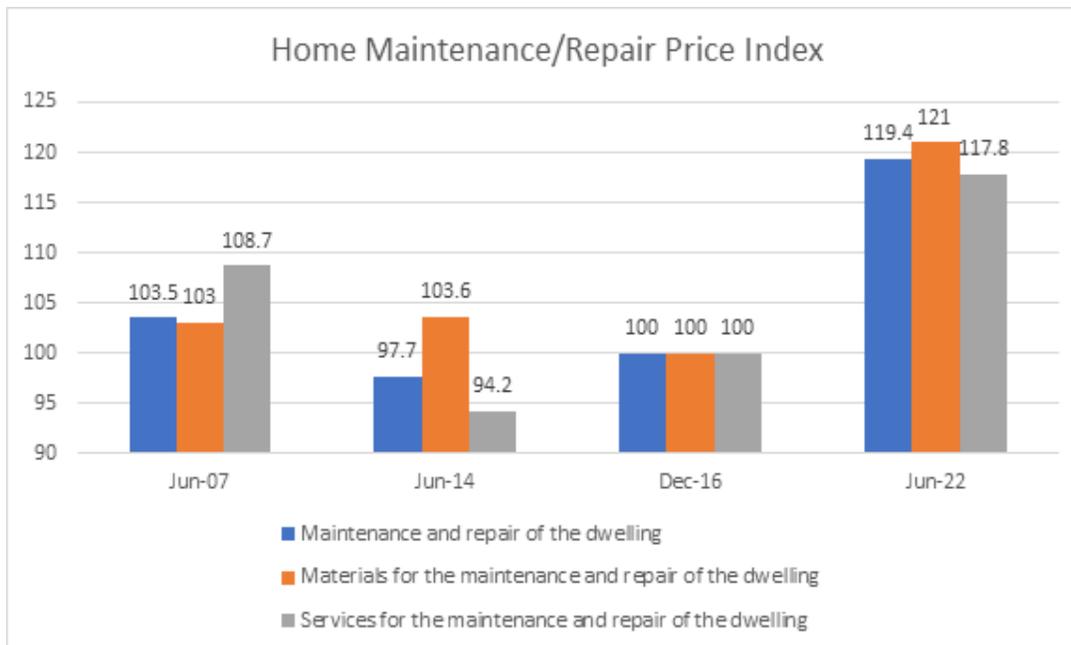
⁹ https://www.ageaction.ie/sites/default/files/age_action_ireland_submission_older_persons_housing_adequacy.pdf

cases where individuals are unable to use part of their homes due to mobility/accessibility issues. Thirdly, the level of cost involved in installing mobility aids to a home are likely to be prohibitively expensive for older persons on lower incomes. This is especially true for those on relatively low incomes who do not satisfy the means test for a grant of an adequate size.

It is therefore highly likely that a proportion of the 562,000+ households headed by older persons has an unmet need to significantly adapt their homes. The basis for estimating this need must be that 35.2% of people aged 65+ have a disability, and they are more likely to be living alone. The estimate excludes those living in suitably modified local authority housing stock or in congregated settings. Age Action estimates that 20% of households with older persons needs accessibility modifications, and up to half of that need has not been met by either households themselves or by local authority grants. This represents up to 56,000 households where an occupant is unable to live as independently as possible and may instead be forced to leave their home prematurely, including by entering residential care. The Age Action Care and Repair service found that 60% of older persons who used the service in 2022 up to June 17th had work carried out which reduced their risk of hospitalization. This demonstrates the demand for a system that effectively ensures all older persons can have safe, accessible homes.

Grant Sizes

In 2022, €65 million was allocated to cover 11,000 grants under the Housing Adaptation Grants for Older People and People with a Disability. This is in contrast with the €84.5 million allocated in 2010. The 2014 Housing (Adaptation Grants for Older People and People with a Disability) (Amendment) Regulations amended the 2007 Regulations and reduced the maximum grant size available, the maximum eligible income level, and the maximum percentage of costs covered under the Housing Aid for Older People Grant.



The above graph demonstrates the significantly higher costs associated with home maintenance and repair in June of 2022, compared to both the year of the original regulations, 2007, and 2014, when the grant sizes and eligibility criteria were reduced. The base year for inflation of these costs is December 2016.¹⁰ While the rate of inflation may subside in the coming years, it is unreasonable to expect construction costs to reduce.

On previous occasions Age Action has called for the grant sizes to be restored to pre-2014 levels. Given the ongoing cost of living crisis, the decreased spending power of state pensions, and the increase in construction, maintenance and repair costs, this is no longer adequate. Regardless of the rationale for reducing grant sizes in 2014, failing to substantially revise them today would only increase the number of older persons in uninhabitable, unsafe homes, as maintenance and repair move further out of reach.

Age Action is calling for a return to the 2007 Regulations which covered up to 100% of the costs associated with the work under a Housing Aid for Older People Grant. The Housing Adaptation Grant for People with a Disability should also cover up to 100% of the costs for those on the lowest incomes. As many older persons have very limited, or no, savings they may delay or avoid necessary works if they must contribute to the costs themselves, as even a small percentage of a large sum can be unmanageable for them. As it is, they are often being left with hidden costs, like paint work after the adaptation or fees for architects when planning works.

As a start, the maximum available grant size for the first band under the Housing Aid for Older People Grant should be €12,100. The maximum available grant size for the first

¹⁰ <https://data.cso.ie/table/CPM16>

band under the Housing Adaptation Grant for People with a Disability should be €34,600. The maximum size of the Mobility Aid Grant should be €6,900. The scheme should receive overall funding of €99.2 million. These proposed grant sizes were arrived at by adjusting what was available under the 2007 Regulations for inflation. The funding proposal was arrived at by adjusting the funding amount from 2010 (€84.5 million) for inflation. Grant sizes should be benchmarked against inflation in home maintenance/repair costs.

Grant Eligibility

People in Ireland are living longer and healthier lives. This is one of the biggest successes of modern society, but it also means policies on ageing need to be adapted. Older persons may be dependent on their pensions as their sole source of income for twenty or thirty years, or more. Traditionally, the modest, fixed incomes that pensions provide are not designed to cover capital costs associated with, for example, replacing a car or the carrying out of significant home modifications. As people live longer, and retain their independence, such costs become inevitable. In 2018, half of persons aged 65+ had savings of €5,800 or less.¹¹ This indicates that older persons may need assistance with one-off capital costs and thus, eligibility criteria for this grant cannot be overly strict. The maximum income under each band should be increased. This is also necessary to reflect the inflation that has occurred since the eligibility criteria was set in 2014. The number of bands should remain at the 2014 level, but the associated income ranges should widen in line with inflation.

There are several hundred thousand dwellings in Ireland that are in some way inadequate, including many dwellings occupied by older persons or people with disabilities. In the context of the government aim to support ageing in place, it is important that a programmatic approach is taken to helping people maintain and improve their homes. As such, the criteria for access to a housing grant needs to be expanded, both in terms of the income and savings of applicants, but also by opening up new types of eligibility criteria, such as dwellings with very low insulation (equivalent to Building Energy Rating E, F or G) or dwellings in a poor state of repair. For an example of wider criteria in action, the government has committed to greater targeting of dwellings with BER E, F or G for SEAI grants.

The Disability Federation of Ireland, in submissions to the Department of Housing, has called for the assessment of income to be revised to be based on personal rather than household income. The reliance on household income can reinforce relationships of dependency for people with disabilities, and Age Action identifies a similar risk for older persons, particularly those living with children or other family members. Spousal income can be appropriately accounted for, but other household incomes should be excluded.

¹¹ <https://data.cso.ie/table/HFC11>

Grant Applications

Since 2014, Age Action's Information Service has dealt with over 1,200 queries regarding the grants. There can be confusion and frustration around the process. Moreover, older persons often have competing housing needs, particularly between maintenance and repairs versus retrofitting for insulation. Streamlining the SEAI grants and the Housing Adaptation Grants application process could mitigate this tension. The remit of the one-stop-shops should cover both schemes and join up both the application processes and eligibility criteria, so that older persons can plan the full range of work they need and have it carried out all at once.

In terms of the application process, ALONE anecdotally reports older persons struggling with acquiring the necessary sign off from occupational therapists in applying for these grants, particularly due to waiting lists to meet with such professionals which can extend the grant application process up to eighteen months.¹²

Age Action estimates that 65% of people aged 65+ are digitally excluded.¹³ In 2016, 61% of people aged from 55 to 65 had low literacy.¹⁴ As the State adopts a 'digital first' approach to public service delivery, the process to access grants should remain accessible offline for the entirety of the process. This includes in terms of initially accessing information and relevant forms, which should be available through local contact points. The application forms and other relevant documents should be available in plain English. These measures should be taken across all public services but are particularly important for services and schemes catering to older persons.

Care and Repair

Some people turn to Age Action's support to install grab rails and other accessibility measures in their home, rather than applying for local authority grants. Anecdotal evidence suggests that barriers to pursuing the local authority grant include the time it takes to process an application, the difficulty to find a tradesperson to do a small job, and the application process itself due to literacy, poor household administration or lack of access to information.

There is already an established set of relationships that signposts people to Age Action's support service, such as through the Age-Friendly Housing Officer, social workers and public health nurses. However, Age Action does not have a grant scheme. Consideration should be given by the Department of Housing to affirming the role of Age Action's Care and Repair service as complementary to the goals of the local authority grants, in which case consideration should be given to expanding funding streams to support this kind of work. For example, the HSE's Integrated Care

¹² Alone, 'Housing Choices for Older People in Ireland' (2018) <https://alone.ie/wp-content/uploads/2018/07/Housing-Choices-for-Older-People-in-Ireland-Time-for-Action-1.pdf>

¹³ https://www.ageaction.ie/sites/default/files/digital_inclusion_and_an_ageing_population.pdf

¹⁴ <https://assets.gov.ie/13262/eed6128954b7449c8cc357dc44fd4a9d.pdf>

Programme for Older People (ICPOP), seeks to “to leverage existing community resources in the local health ecosystem”.¹⁵ To this end, the HSE has funded Care and Repair for people preparing to leave hospital so that they can carry out activities of daily living when they return home.

Other Concerns

At present, older persons are experiencing an onerous and unfair process of having to re-submit paperwork if their building works are delayed by even a couple of months. Once the application process is successful, recipients should have a twelve-month period to begin the process of adapting their home before the approval lapses. This would be a realistic response to the waiting periods associated with contracting builders and would remove pressure on recipients to begin works hastily, which may lead to them paying more than they need. The Disability Federation of Ireland has also suggested that payments should be made directly to the contracted builder, so that recipients do not have to pay the costs themselves in advance of receiving the grant.

Age Action is concerned about the growing number of older persons in the private rental sector, who will have little opportunity to transition to home ownership even if they want to. In other contexts, the government has committed to promoting ageing in place, and we must ensure this is also possible in rented homes. Therefore, alongside broader reforms to the private rental sector including stronger long-term tenancy protections, an element should be introduced to the Housing Adaptation Grant scheme that incentivises uptake by landlords.

¹⁵ <https://www.icpop.org/integrated-care-framework>