Submission from the

National Disability Authority

to the

Housing Adaptation Grant Scheme Review

 August 2022

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**1. Introduction**

The National Disability Authority (NDA) is an independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities.

The UN Convention on the Rights of Persons with Disabilities (UNCRPD) creates a new benchmark for the realisation of the right of persons with disabilities to adequate housing through Article 19 – Living independently and being included in the community.

This requires that Ireland delivers on the rights of persons with disabilities to “live in the community with choices equal to others” and to “have the opportunity to choose their place of residence and where and with whom they live”. This is at the heart of the policy of decongregation (Time to Move On from Congregated Setting, a strategy for community inclusion) being progressed by the HSE, but is also relevant to persons with disabilities in the community who wish to move out of the family home, for example.

Article 28 of the Convention requires the State to deliver on the right to “adequate housing” and to “ensure access by persons with disabilities to public housing programmes”.

It is clear from the language of the UNCRPD that the Housing Adaptation Grants Scheme (HAG) can be an important mechanism for the realisation of the rights listed above.

**2. Policy context**

As well as the rights set out in the UNCRPD, there are other references to the HAG as a key supporting initiative in other national strategies. It is clear that this review is being carried out under the auspices of Housing for All. Housing Policy Objective 7.4 commits to:

Review the range of housing grants available to assist with meeting specific housing needs, including the Housing Adaptation Grant for People with a Disability, and implement relevant changes

The policy also highlights the fact that the Government has increased the amount of money available to the HAG, from €43 million in 2014 up to just over €80 million last year, in recognition of its necessity as a housing support payment. The **National Housing Strategy for Disabled People 2022-27** (NHSDP) reiterates the above commitment. In addition to this, the Housing Agency has looked at other jurisdictions highlighting the fact that:

A number of countries examine functionality, accessing, moving around and leaving the home as a basis for their decisions on modifications and adaptations.[[1]](#footnote-1)

In addition to this, there is an indication that the type of measures that could be covered by the HAG should be examined under any review:

including the examination of the inclusion of grants for assistive technology to take advantage of the improvements in technology[[2]](#footnote-2)

However, research has found the total level of funding available for such schemes is insufficient to meet societal demand and the value of individual grants are often not sufficient to cover the full cost of the adaptations that individuals require.

# 3. Data on persons with disabilities in private accommodation

Based on Census 2016 of the 643,131 (13.5% of the population) the vast majority (92.9%) of persons with disabilities live in private accommodation. A trend of more persons with disabilities transitioning from communal settings to living in private accommodation is a positive one, but is likely to increase the number of housing adaptations required in the nation’s housing stock. [[3]](#footnote-3)

Figures from the Economic and Social Research Institute (ESRI)[[4]](#footnote-4) show that that 73.4% of persons with a disability are home owners, 11.4% are in private rented accommodation and 15.2% are in local authority housing.

The ESRI also found that housing deprivation was greater among persons with disabilities; 34% compared to 23% for the rest of the population. The ESRI state that housing deprivation exists if a home experiences one, or more, of these issues:

• Leaking roof/damp walls, floor or foundation/rot in windows frames or floor;

• dark rooms;

• no central heating;

• no double glazing

In addition the ESRI found that persons with disabilities are 7% more likely to live in areas that experience all or some of these problems:

• crime/ vandalism;

• pollution/grime caused by traffic or industry; and

• noise from neighbours or the street.

Persons with a disability are 1.4 times more likely to be living in over-crowded households and this pattern persists regardless of geographical location, however, this can be accounted for by this group’s lower income.

To highlight one cohort of persons with disabilities that benefit from the HAG, the NDA has tried to estimate the number of wheelchair users in Ireland. The Census instrument does not capture the numbers of individuals using wheelchairs, but the NDA advises there are other routes to obtaining this information[[5]](#footnote-5).

Based on the figure above, and allowing for demographic change since 2006, the NDA estimates that there may be up to 35,200 wheelchair users in Ireland at present. Without considering other types of disability, this is a significant number of people who might require access to the HAG. If you include this total in the Census 2016 figure for the almost 263,000 people who experience a condition that substantially limits one or more basic physical activities, then, based on the ESRI figures above – there are almost 245,000 people with a physical disability in private accommodation.

**NDA Advises:**

**The current approach to collection of data should be reviewed to facilitate more in depth assessment work of the scheme’s operation and the return on investment for the individuals. In particular, data should be collected on disability type and the individual payments associated with particular adaptations. There would need to be standardisation of formatting of any additional data captured, above and beyond what is already collected.**

# 4. Consultation

In December 2021 the NDA consulted with particular Disabled Persons Organisations (DPOs) to inform a number of work items, the DPOs emphasised that while the possibility of changes to the design requirements for new housing are to be welcomed, persons with disabilities still face difficulties with the accessibility of the existing housing stock and that this will continue to be an issue. DPOs highlighted a number of issues their members have with the housing adaptation grant process:

* In some cases the waiting time to get a grant can be up to one year which is a significant delay in facilitating someone to achieve improved accessibility in their home
* The housing adaptation grants are means tested, while other grant schemes are not, such as those provided by the SEAI,
* The low ceiling of the grant allowed, which even before recent cost-of-living increases created challenges for those on lower incomes or benefits
* The limited equipment available under the grant system, so that a person cannot choose particular equipment to meet their individual need
* The medicalised design of many of the items on the list that are available under the grant risks leaving homes with an institutional/hospital feeling
* The lower ceiling for grants on houses that are less than 12 months old

# 5. Costs

The NDA has been working on a cost comparison between features required in a standard home and the equivalent costs for features required in a UD Home and UD+ Home (wheelchair accessible).

This work will be of great benefit and is also feeding in to a wider NDA project on a Cost Benefit Analysis of Universal Design Homes. The 2019 inter-Departmental policy statement **Housing Options for our Ageing Population** outlines a range of actions, including the aim that within five years 30% of new builds in Ireland should incorporate Universal Design (UD) principles to accommodate Ireland’s ageing population. The NDA is in the process of developing this economic and social evaluation of UD homes through the performance of a CBA in accordance with the Public Spending Code.

This can be allied with an analysis of the cost of building (see Appendix 1). Construction prices have risen substantially since the time of the last HAG review and that price inflation has become particularly pronounced more recently. According to a report from the Society of Chartered Surveyors Ireland construction inflation was 13% in April 2022. This compares to a Eurostat estimate of overall Irish inflation at 9.6% in June 2022. As a result the NDA advises that it would be timely for the value of grant awards to be increased to take account of sectoral inflation.

According to data from the Department of Housing, Local Government and Heritage 3,165 housing adaptation grants were made to persons with disabilities in 2020 with an average value of €8,421 per grant.[[6]](#footnote-6) This compares to 1,682 mobility aid grants with an average value of €3,544 and 3,290 housing adaptation grants for older people administered in 2020 with an average value of €3,879.[[7]](#footnote-7) These means tested[[8]](#footnote-8) grants play an important role in providing financial support to persons with additional accessibility needs who require adaptations to be made to their home.

A 2010 evaluation of the schemes undertaken by the Housing Agency found that a lack of adequate funding for the schemes was identified as the main problem for applicants. (Housing Agency, 2010 pg.4)[[9]](#footnote-9) A survey of applicants undertaken as part of the review highlighted that some individuals found the application process to be too complicated and that waiting times for a decision on most applications ranged from 9-11.6 weeks. Importantly, maximum funding limits were often seen as inadequate to cover full adaptation costs, and available grant funding was found to cover all of the costs involved in just 18% of cases, with the shortfall funded from savings (53%), family or friends (31%) or a loan (18%). The Table below presents the average grant value, the average total cost of works and the average funding gap for each housing adaptation scheme based upon the Housing Agency’s survey data.

Adaptation Grant Values and Total Cost of Works 2010

|  | **HOP** | **HAG** | **MAG** |
| --- | --- | --- | --- |
| AVG Grant Value  | €6,429 | €12,865 | €5,012 |
| AVG Cost of Works  | €10,844 | €18,974 | €7,476 |
| Funding Gap  | -€4,415 | -€6,109 | -€2,464 |

Source: Housing Agency 2010[[10]](#footnote-10)

It is apparent that the limits on grant values often do not meet the total cost of adaptation works and that these have not been adjusted in recent years despite significant inflation in the construction sector. While we can’t say with any certainty how long the current spike in costs will last, it is important that that a new baseline for grant calculation be established to reflect cost increases since the limits were first established.

## Assistive technology

While the more traditional aids like hoists and stair lifts are covered by the HAG the NDA advises that this Review also provides an opportunity for newer assistive technologies be made a more central part of what is available for persons with disabilities to be funded to use under the HAG. One of the initiatives left over from the previous **National Housing Strategy for People with a Disability 2011-2016** (extended to 2021) was to identify good practice in implementing assistive technology and ambient assistive living technology to support independent living.

The Department will be aware from the partnership with the NDA around the Homes for Smart Aging Universal Design Challenge[[11]](#footnote-11) 2017 that over 60 entries were received many focusing on new smart technologies for the home. The Department is also aware of the value of the new innovations that came out of this partnership and the value of same.

Based on feedback that the NDA has received this would be very much welcomed by potential applicants for the HAG as it would provide a broader range of options. It would also allow for a move away from the medicalised design of some assistive technologies that make the users think they are living in an institution rather than a home.

**NDA Advises:**

**The maximum grant available should be increased substantially to reflect actual building costs. The grants should be index-linked.**

**NDA Advises:**

**That the Department look at new technologies –including Assistive Technology – to improve independence in the home and reduce the need for more traditional aids and appliances funded under the HAG.**

# Eligibility Criteria

Adapting a home to make it liveable for a person with a disability is a cost that most of the population does not face. Persons with disabilities already face lower employment levels and higher poverty levels than the majority of the population. The Cost of Disability in Ireland Report found that the actual costs faced by individuals will severe disabilities on average range from €9,600 - €12,300 per annum and for those with limited disabilities from €8,700 - €10,000 per annum.

It is important that the HAG is targeted at those most in need with the least amount of available resources to pay for the work that is needed to be done.

As mentioned above the SEAI runs a grant scheme covering energy upgrades for homeowners on low incomes called the Better Energy Warmer Homes Scheme.

Many persons with disabilities would qualify for this scheme as it stands. Many persons with disabilities live in older accommodation that has been passed on to them because they cannot afford to buy their own home. These homes often have lower BER ratings and may be more likely to contain barriers that prevent a person with a disability being able to live properly in their own home.

Both schemes are aimed at improving the quality of life of the occupants. The SEAI scheme has a much greater potential reach than the HAG yet it states that occupants will not be charged for work done under the scheme. It is the case that the HAG potentially involves much costlier structural works than the SEAI scheme, however, could there be an option in the HAG to have certain cost for individual items priced separately like the SEAI scheme with project costs varying depending on the type of dwelling involved[[12]](#footnote-12) As mentioned above the NDA has been working on a large number of cost comparisons.

## Persons with autism

People with autism and their families can have very particular accommodation requirements, some of which can be fulfilled under the HAG. It is not as clear as it could be in the current regulations that persons with autism are covered by the HAG.

It is sometimes the case that medical grounds are not the reason why extra outdoor or indoor space is required to improve the quality of life for a person with autism and their family.

Some people with autism would benefit from having some outdoor space to spend time in, while others may be helped by having some extra space indoors to spend time in.

While local authorities may face challenges around the range and type of accommodation on offer, in the case of people with autism and/or their families some needs are best catered for by an “extra room” because there are many people seeking housing supports who are living in overcrowded and unsuitable accommodation. An extra room may be needed for a carer for overnight stays.

It can often be the case that it isn’t the person with autism who needs extra space, but a sibling(s) who is kept up all night as a result of the person with autism’s behaviour. Such situations may not lend themselves to “medical” justifications for why supports are needed. Overall the system of medical justifications could be streamlined as it can be quite fragmented at the moment.

## Persons with dementia and carers

The NDA’s Universal Design Home Guidelines[[13]](#footnote-13) outline a range of issues concerning study rooms, and storage and utility spaces. These sufficiently cover issues regarding dementia friendly design. However, in the context of a dwelling that is designed to not only support the person with dementia, but also support family members and carers, it is worth discussing the provision of a retreat space for both people with dementia and carers. This retreat space may simply be a bedroom or a study that allows the person with dementia or carer to withdraw to a quiet space or carry out activities in privacy.

**NDA Advises:**

**Using the emerging data from Census 2022, the Department should target funding for the scheme at those areas of the State with the largest proportions of persons with disabilities. The Department give due consideration to which regions or local authority areas will have greatest demand for funding, based on numbers of older persons and persons with disabilities who can benefit from housing adaptations.**

**NDA Advises:**

**That there should be a synergy between the HAG and SEAI schemes where work on adaptations and energy efficiency could be merged to provide an overall solution, in order to save time and money**

**NDA Advises:**

**The Department should consider incorporating the needs of persons with autism and persons with dementia (and their carers) in to the list of criteria covered by the HAG.**

**6. Application Process**

The NDA advises that there are some people who require supports in navigating the application process for the HAG. The NDA advises that a Universal Design approach is taken to any reforms of that system and that relevant supports are provided, which might include approaches such as longer appointment times, and liaison with a support person of the individual where required. The NDA acknowledges that improvements have taken place with regard to consolidating and simplifying application forms and related information. We were happy to provide the Department with advice on this in 2019. Making forms more accessible to persons with disabilities makes them more accessible to all and reduces one barrier to the application process. There will be some people who will require forms in different formats to assist them in understanding and completing the forms. This should be done in parallel with designing all forms following a Universal Design approach to communications (see reference to the Toolkit below). The NDA advises that user feedback on these forms is regularly sought including whether people complete the forms themselves or rely on family or support organisations for support.

As a starting point it may also be beneficial to let potential applicants see more information than currently exists on the application form in relation to the VAT refunds available from Revenue on aids and appliances (Assistive technologies)[[14]](#footnote-14).

## Timeframes

A recent private members bill[[15]](#footnote-15) in the Oireachtas called for a statutory four week time limit for applications to be processed. While the Government didn’t oppose the Bill outright they highlighted the fact that the HAG application process is different from the planning application process. The flexibility of the administrative guidance is needed because the progress of a HAG application is dependent on matters that the local authority can’t control, namely the availability of occupational therapists (OTs) and the willingness and availability of builders to quote for and carry out the work required.

There may be some merit in investigating whether local authorities should pay the OTs up front rather than ask applicants to pay and then reclaim up to €250 back. This would help speed up the process with the potential added bonus that more OTs may make themselves available for this kind of work. If required the ability of the applicant to be able to afford to pay an OT privately should be taken into account when deciding on which applicants OT fees should be covered up front.

**NDA Advises:**

**Greater co-ordination needs to be developed between local authorities and OT services in order to minimise delays in assessments being carried out.**

**The inequity created by the ability of people who can afford to pay for private OT assessments advancing their claims in some local authorities must be addressed. NDA recommends that local authorities consider issuing payments to independent OTs to carry out assessments in areas where delays are experienced in order to alleviate assessment delays and ensure equality of access to the grant.**

## Accessibility

There are also a number of statutory obligations in place that will have implications for how the HAG is administered, and how housing officers engage with applicants. We take the opportunity to set out a brief overview of these obligations below, and suggest that the Review process offers an opportunity to ensure this information is clearly communicated at local authority level.

All relevant public bodies are subject to the relevant sections in Part 3 of the **Disability Act 2005** which places an obligation on public bodies to make their information and services accessible. Under section 26 there is a statutory requirement on public bodies to integrate, where practical and appropriate, their services for persons with disabilities with those for other citizens. Under section 28 public bodies must take steps to make their communications accessible to persons with disabilities. The work on the new forms for the Housing Adaptation Grant schemes is an example of improving the accessibility of information for everyone, not just for persons with disabilities. All public bodies working on the provision of housing for persons with disabilities are advised to make all forms of communication accessible, and a commitment in this regard would be appropriate for the new Housing Strategy.

To support public bodies in the implementation of section 28 of the Disability Act the NDA has produced, in partnership with the Department of Public Expenditure and Reform, a **Customer Communications Toolkit for the Public Service: A Universal Design Approach[[16]](#footnote-16)**. This document offers guidance on best practice for public bodies in communicating with its customers using a Universal Design approach. Universal Design principles should be a key element in the design of all resources and materials related to housing.

The statutory Code of Practice on accessibility of public services and information provided by public bodies complements these provisions.[[17]](#footnote-17) This Code of Practice has been updated and a new version is currently awaiting signature from the Minister for Children, Equality, Disability, Integration and Youth. The NDA advises that all public sector officials working on the provision of housing for persons with disabilities should have access to the Toolkit and the Code of Practice.

All government departments and public bodies involved in the delivery of housing for persons with disabilities are required to comply with the **Irish Sign Language Act (ISL) 2017**. Therefore, public bodies will need to provide timely access to their services through ISL when requested using accredited ISL interpreters. They will also need to factor in the timeframes involved in meeting requests for face-to-face or remote interpreting, based on the circumstances of each request. This could apply to meetings about housing adaptation grant applications or social housing applications, for example. The Department of Children, Equality, Disability, Integration and Youth has legislative responsibility for this Act.

Under the EU **Web Accessibility Directive** (WAD) all government departments and public bodies involved in housing must ensure their websites and mobile apps are accessible to all people, including persons with disabilities. It is already a requirement, under sections 26 & 28(2) of the **Disability Act 2005,** that websites and electronic communications, originating within this jurisdiction, are accessible to persons with disabilities. The WAD, however, sets out specific timeframes and standards for web accessibility that have to be met under the Regulations.

The **Web Accessibility Directive** (WAD) was transposed into Irish law via the **European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020** which came into force on 23 September 2020. Public sector bodies comply with the 2020 Regulations if for all websites and mobile apps they:

* Meet the relevant parts of the harmonised European standard EN 301 549 V2.1.2 (2018-08). This is the same as meeting all the Level AA Success Criteria from the international guidelines WCAG 2.1.Publish and maintain an Accessibility Statement about their websites or mobile apps. The NDA is the monitoring body for the WAD.

The NDA advises the importance of a commitment within the Department of Housing, Local Government and Heritage to ensure their websites meet the standards set out in the Directive at the earliest opportunity.

The **Assisted Decision-Making (Capacity) Act 2015** has not yet been fully commenced. Amending legislation is currently being drafted and is due to be enacted before the end of 2022. However, we note the potential implications of this Act for all relevant public bodies. The Act proposes the use of a functional definition of capacity, whereby capacity is assessed only in relation to the matter in question and only at the time in question. The Act presumes that a person will have the capacity to make a decision on what is best for them with regard to housing. The Act also proposes three types of decision-making support arrangements to respond to the range of support needs that people may have in relation to decision-making capacity. The Decision Support Service is a new service for all adults who have difficulties with their decision-making capacity. This may include people with an intellectual disability, mental illness or acquired brain injury, as well as people with age-related conditions who may need supports to make decisions. It expects to be operational in 2022. The NDA advises that housing officers and other relevant staff keep abreast of these developments and the relevant Codes of Practice on Supported Decision-Making that are being developed. When the Act is commenced it may be appropriate to consider whether a specific Code of Practice or guidance for the housing sector might be necessary, and how this could be progressed.

**NDA Advises:**

**The application process should be designed following a Universal Design approach to the presentation and communication of information to all potential applicants**

**7. Recommendations**

The NDA advises the following in the interest of improving the scope, flexibility and efficiency of the HAG:

1. **The current approach to collection of data should be reviewed to facilitate more in depth assessment work of the scheme’s operation and the return on investment for the individuals. In particular, data should be collected on disability type and the individual payments associated with particular adaptations. There would need to be standardisation of formatting of any additional data captured, above and beyond what is already collected.**
2. **The maximum grant available should be increased substantially to reflect actual building costs. The grants should be index-linked..**
3. **That the Department look at new technologies –including Assistive Technology – to improve independence in the home and reduce the need for more traditional aids and appliances funded under the HAG**
4. **Using the emerging data from Census 2022, the Department should target funding for the scheme at those areas of the State with the largest proportions of persons with disabilities. The Department give due consideration to which regions or local authority areas will have greatest demand for funding, based on numbers of older persons and persons with disabilities who can benefit from housing adaptations**
5. **That there should be a synergy between the HAG and SEAI schemes where work on adaptations and energy efficiency could be merged to provide an overall solution, in order to save time and money**
6. **The Department should consider incorporating the needs of persons with autism and persons with dementia (and their carers) in to the list of criteria covered by the HAG.**
7. **Greater co-ordination needs to be developed between local authorities and OT services in order to minimise delays in assessments being carried out.**
8. **The inequity created by the ability of people who can afford to pay for private OT assessments advancing their claims in some local authorities must be addressed. NDA recommends that local authorities consider issuing payments to independent OTs to carry out assessments in areas where delays are experienced in order to alleviate assessment delays and ensure equality of access to the grant.**
9. **The application process should be designed following a Universal Design approach to the presentation and communication of information to all potential applicants**

# APPENDIX 1



Sources: Society of Chartered Surveyors Construction Tender Price Index; Housing Construction Cost Index; Housing Construction Price Index; Wholesale Price Index (Excl VAT) for Building and Construction Materials; Building & Construction Capital Goods Price Index;

1. NHSDP 2022-27, page 41 [↑](#footnote-ref-1)
2. Ibid, page 16 [↑](#footnote-ref-2)
3. <http://nda.ie/resources/factsheets/nda-factsheet-5-housing/nda-factsheet-5-housing-briefing-information.pdf> [↑](#footnote-ref-3)
4. Discrimination and Inequality in Housing in Ireland, June 2018 <https://www.esri.ie/system/files/publications/BKMNEXT361.pdf> [↑](#footnote-ref-4)
5. The first National Disability Survey was undertaken by the CSO post the 2006 Census. This involved a face to face interview with 12,600 persons with disabilities. The exercise was supported, at the time, by the then Department of Justice and Equality and the Department of An Taoiseach. This data allowed us to estimate that there were approximately 31,342 wheelchair users in Ireland at that time.

The NDA believes it would be timely for the National Disability Survey to be repeated following the next scheduled Census, i.e. in 2027. This would allow for this data to be updated, and also for a richer understanding of the challenges and barriers experienced by disabled people in Irish life, 20 years after the first survey.

In the meantime, we have been engaging with the CSO to see if there are other opportunities to capture data in relation to wheelchair usage, for example through the Quarterly National Household Survey instrument. The data collected by local authorities would also be of benefit in this regard, and the NDA would be happy to work with any such bodies to advise and support the collection of disability data, disaggregated by disability type where feasible, as this is in keeping with one of our statutory functions under the National Disability Authority Act 1999 - Section 8(2)(b) [↑](#footnote-ref-5)
6. Available: <https://data.gov.ie/dataset/housing-adaption-grant-for-people-with-a-disability-2014-2020> [↑](#footnote-ref-6)
7. Available: <https://data.gov.ie/dataset/housing-adaption-grant-for-mobility-aids-grants-2014-2020>

Available: <https://data.gov.ie/dataset/housing-adaptation-grants-for-older-people-2014-2020> [↑](#footnote-ref-7)
8. “The effective maximum grant of €30,000 to cover up to 95% of the cost of works, may be available to applicants with gross household incomes of up to €30,000 per annum, tapering to 30% for applicants with gross household incomes of between €50,001 and €60,000 per annum.” See: Department of Housing (2021) ‘Housing Adaptation Grants for older people and people with a disability.’ Available: <https://www.gov.ie/en/service/6636c-housing-adaptation-grants-for-older-people-and-people-with-a-disability/> [↑](#footnote-ref-8)
9. See: Housing Agency (2010) ‘Evaluation of the Housing Adaptation Grant Schemes for Older People and People with a Disability’

Available: <https://www.housingagency.ie/sites/default/files/57.%20Evaluation-of-the-Housing-Adaptation-Grants-Scheme-for-Older-People-and-People-with-a-Disability_-June-2010.pdf>

See Also: Housing Agency (2013) ‘Review of the Housing Grants for Older People and People with a Disability.’ Available: <https://www.housingagency.ie/sites/default/files/50.%20Review-of-the-Housing-Grants-for-Older-People-and-People-with-a-Disability.pdf> [↑](#footnote-ref-9)
10. See: Housing Agency (2010) ‘Evaluation of the Housing Adaptation Grant Schemes for Older People and People with a Disability’ pg.101

Available: <https://www.housingagency.ie/sites/default/files/57.%20Evaluation-of-the-Housing-Adaptation-Grants-Scheme-for-Older-People-and-People-with-a-Disability_-June-2010.pdf> [↑](#footnote-ref-10)
11. <https://universaldesign.ie/awards/homes-for-smart-ageing-universal-design-challenge/> [↑](#footnote-ref-11)
12. <https://www.citizensinformation.ie/en/housing/housing_grants_and_schemes/grants_for_a_home_energy_upgrade.html> [↑](#footnote-ref-12)
13. <https://universaldesign.ie/built-environment/housing/dementia-friendly-dwellings/> [↑](#footnote-ref-13)
14. <https://www.revenue.ie/en/vat/repayments-to-unregistered-persons/disabled-persons/reclaim-vat-aids-appliances.aspx> [↑](#footnote-ref-14)
15. <https://www.oireachtas.ie/en/debates/debate/dail/2022-04-07/44/> [↑](#footnote-ref-15)
16. <http://universaldesign.ie/Products-Services/Customer-Communications-Toolkit-for-the-Public-Service-A-Universal-Design-Approach/> [↑](#footnote-ref-16)
17. <http://nda.ie/good-practice/codes-of-practice/code-of-practice-on-accessibility-of-public-services-and-information-provided-by-public-bodies-/> [↑](#footnote-ref-17)