**Levelling Up, Housing and Communities Committee inquiry on housing for people with disabilities**

**Who we are**

We’re RCOT, the Royal College of Occupational Therapists. We’ve championed the profession and the people behind it for over 90 years; and today, we are thriving with over 36,000 members. Then and now, we’re here to help achieve life-changing breakthroughs for our members, for the people they support and for society.

This includes giving members opportunities to learn, research, teach, practice and continuously improve their knowledge and skills. We also work with healthcare commissioners, political leaders and others to position occupational therapy as a solution at the heart of health and social care.

We have a vision, that people everywhere value the life-changing power of occupational therapy.

Occupational therapists are the only health professionals who routinely work across health, social care and housing settings. Occupational therapists have expertise in the design of accessible buildings and environmental adaptations that remove barriers to independence, facilitate inclusion and reduce risks to health and wellbeing.

Occupational therapists are trained to support people with physical health, mental health and learning disabilities. They work with people of all ages and consider how people’s needs change and progress across their life-course. As such, occupational therapists are skilled in identifying environmental solutions that meet the needs of a wide range of people over a sustained period of time.

Our response to this consultation is based on the questions posed by the Levelling Up, Housing and Communities Committee, drawing on valuable insights provided by our members.

**What can the Government do to ensure disabled residents across England have access to accessible and adaptable housing?**

To address the pressing issue of accessible and adaptable housing for disabled residents in England, the government should prioritise swift action. Implementing Building Regulations standard M4(2) as the minimum baseline for all new builds is a crucial step. This would ensure that new housing across the country achieves a consistent level of accessibility. Furthermore, making it mandatory for new build schemes to incorporate a percentage of category M4(3) accessible properties in all authorities (comparable to the approach in London and Liverpool) will significantly enhance the availability of such housing. Local authorities should be required to demonstrate that there is *no* need for wheelchair accessible homes, rather than demonstrating the ‘need’ for these properties. The lack of wheelchair accessible homes across the country is well-documented. Individuals have attempted to access social housing but faced numerous barriers in the process, highlighting the need for improved accessibility in housing options.

In addition to new builds, it is vital to consider existing housing stock. The establishment of a national accessible housing register that encompasses all housing tenures can facilitate the effective utilisation of existing accessible housing. This register can build upon the Accessible NOW channel, developed by Homefinder UK and Habinteg, to provide disabled individuals with a centralised resource for locating suitable housing.

Moreover, addressing the delays and constraints in the Disabled Facilities Grant (DFG) process is essential. The government should streamline the process to reduce delays and increase the maximum grant amount to account for rising building costs. Local authorities should receive additional resources, especially Occupational Therapists, to expedite housing adaptations. Flexibility in the use of DFG funding and the formulation of robust Housing Assistance Policies can further enhance support for disabled residents. Individuals have attempted to access support through social services but faced limitations in the DFG process, highlighting the need for streamlining and improving access to these vital grants.

Additionally, examining the placement of housing services within each council, particularly by embedding them within adult social care departments, can encourage joint working and more efficient service delivery. Lastly, measures should be taken to protect the interests of disabled tenants in the private rented sector, including grants for landlords to implement essential adaptations and encouraging landlords to accommodate accessibility needs within their properties. Individuals have demonstrated the challenges faced in finding suitable private rental housing with adaptations, underlining the need for increased support in the private sector.

**Does the National Planning Policy Framework ensure the Equality Act 2010 is complied with when building housing?**

The current National Planning Policy Framework falls short of ensuring compliance with the Equality Act 2010, particularly regarding the availability of accessible housing for disabled people. While the framework does mention accessibility standards, these standards are often misinterpreted or not fully implemented by contractors. As a result, critical accessibility features like door thresholds, automatic doors, and bathroom layouts are often subpar.

A promising solution to enhance compliance would be to involve Local Authority Occupational Therapists and experts by experience in the development of the framework. Their expertise can contribute to a more comprehensive approach to accessibility. Additionally, the framework should prioritise ground-floor accessible housing during planning applications, particularly for multi-occupancy housing.

**Since the Government consultation 'Raising accessibility standards for new homes' (July 2022), what has been done to improve housing provisions for disabled residents in England, and has it been sufficient?**

Unfortunately, progress in improving housing provisions for disabled residents in England since the 'Raising Accessibility Standards for New Homes' consultation in July 2022 has been insufficient. The government should take immediate action to rectify this situation.

Implementing Building Regulations standard M4(2) as the minimum baseline for all new builds is a crucial step to ensure that accessibility standards are met. Additionally, the government should publish the findings of its commissioned research into Part M to better understand effective and lacking aspects of accessible housing design and supply.

Coordination among developers, planning departments, and local communities is vital to meet the accessibility needs of local residents effectively. Ensuring that those on waiting lists for social housing are not overlooked is equally important.

**What role should the Government, Local Authorities, and developers have in ensuring the delivery of suitable housing for disabled people?**

The roles of the Government, Local Authorities, and developers are pivotal in ensuring the delivery of suitable housing for disabled people. The government should mandate the baseline requirement for M4(2) and M4(3) nationally while adequately funding local authorities to provide adaptation services. Local authorities should leverage in-house accessibility expertise, particularly Occupational Therapists, to ensure that new developments meet accessibility standards.

Developers should adopt the RIBA Inclusive Design Overlay to ensure accessibility considerations are integrated throughout the design and development process. It's crucial to establish consistency in housing accessibility standards across the sector, with clear parameters to ensure suitability and future-proofing.

Moreover, it's essential to address the specific needs of families with disabled children, ensuring that housing developments meet not only accessibility standards but also the practical needs of these families. Collaborative efforts and coordination among all stakeholders are key to delivering suitable, accessible housing for disabled individuals.

**Does the Disabled Facilities Grant fully support housing adaptations?**

While the Disabled Facilities Grant (DFG) is a crucial resource for housing adaptations, improvements are needed to ensure it fully supports the diverse needs of disabled individuals. The DFG process should be expedited to reduce delays, particularly for newly disabled individuals who require rapid adaptations.

A critical aspect is to review the upper limit and means testing arrangements for the DFG to ensure that it adequately supports life-changing adaptations. Furthermore, the government should ensure that DFG funding keeps pace with the increasing costs of adaptations, especially for large-scale projects.

Incorporating discretionary grants within Housing Assistance Policies can speed up the provision of adaptations and support a broader range of adaptation types. Investment in the Occupational Therapist workforce is necessary to expedite the delivery of adaptations and ensure they align with individual needs.

The RCOT publication *Adaptations without delay* provides a practical framework to support local systems to streamline the delivery of housing adaptations, making best use of the available workforce, reducing waiting times and increasing efficiency.

**How can the Government ensure it provides sufficient provisions to support disabled residents who do not live in new build homes?**

To support disabled residents who do not reside in new build homes, a multifaceted approach is required. Many disabled elderly individuals own inherited homes but lack the funds for necessary renovations, such as boiler repairs. To address this, emergency grants can be made available to assist with essential adaptations, ensuring that individuals can maintain their independence and avoid unnecessary hospitalisation.

Access to information and support through resources such as Good Home Hubs, proposed by the Centre for Ageing Better, can be instrumental in guiding individuals to available grants and support. The government should provide clearer guidelines for adapting existing properties and consider raising grant amounts to match the rising costs of building materials and contractors.

Addressing the shortage of accessible social housing is crucial. Strategies to support people who need to relocate to suitable properties, such as increased availability of accessible social housing, should be explored. Furthermore, streamlining the process for carrying out necessary adaptations can significantly reduce waiting times, improving the quality of life for disabled individuals.

**What can the Government do to support disabled tenants in the private rented sector?**

Supporting disabled tenants in the private rented sector requires collaborative efforts between the government, landlords, and regulatory bodies. Offering grants to landlords for essential adaptations, such as level-access showers, can incentivise them to accommodate accessibility needs within their properties.

The government should also consider encouraging ground-floor accommodation to be offered to people with disabilities first, particularly in multi-occupancy bedsits. Promoting the National Residential Landlords Association (NRLA) adaptations guidance and creating a national website of accessible properties for private rent and purchase can improve accessibility options for tenants.

Additionally, working closely with mainstream estate agents to include accessibility criteria on their websites can help tenants identify suitable properties more easily. Access to information and support, such as via Good Home Hubs, as proposed by the Centre for Ageing Better, should be available to tenants to help them navigate available resources, including Disabled Facilities Grants (DFGs).

To address the reluctance of some landlords to adapt their properties, there could be potential for introducing a legal duty for housing associations and larger landlords. This would ensure that they prioritise and accommodate adaptations for disabled tenants. Furthermore, proactive measures are necessary to prevent evictions of individuals with disabilities, especially those with high levels of need.