



promoting equality in housing  
hybu cydraddoldeb ym maes tai

## **Accessible Housing Registers: Progress in Wales Report for Welsh Government Housing Adaptations Steering Group Tai Pawb, February 2019**

**For more information, contact: [Alicja@taipawb.org](mailto:Alicja@taipawb.org) or [Ross@taipawb.org](mailto:Ross@taipawb.org)**

### **Introduction**

For the past eight years, Tai Pawb has been involved in work aimed at improving the provision of accessible housing registers in Wales. This includes research and advice, facilitating the exchange of good practice, running an Accessible Housing Registers Network as well as working directly with local authorities to advise on, facilitate and review the development of accessible housing registers in several areas.

Recent reports related to disability and housing issues (including our own) have been critical of slow progress in relation to accessible housing registers in Wales.

This paper provides an overview of developments in this area since the Housing White Paper commitment in 2012 and offers an opportunity to reflect and discuss the best ways to take this area of work forward.

Reports related to the provision of adaptations and the affordable housing review (in particular developing accessible housing) offer an opportunity to look at the extent to which the housing system delivers positive outcomes for disabled people. In our view however, accessible housing allocation is the third and essential element of the system which needs much greater attention.

### **Recent Policy and Reviews**

Homes for Wales White Paper 2012<sup>1</sup> contained a commitment from Welsh Government to ensure there is an Accessible Housing Register covering every local authority area, based on good practice and collaborative working. The same commitment was reflected in the Welsh Government Framework for Action on Independent Living (2013)<sup>2</sup>. Interestingly this commitment does not feature in the current draft WG Action on Disability<sup>3</sup> – a new version of the Framework, consultation on which was concluded on the 18<sup>th</sup> of January). *We would recommend that this is reviewed.*

---

<sup>1</sup> <https://gov.wales/betaconsultations/housing-and-regeneration/housewhitepaper/?lang=en>

<sup>2</sup> <https://gov.wales/docs/dsjlg/publications/equality/130916frameworkactionen.pdf>

<sup>3</sup> <https://beta.gov.wales/action-disability-right-independent-living>



In 2013, Welsh Government published a report entitled *Accessible social housing in Wales: a review of systems for assessment, recording and matching*<sup>4</sup>. The report was a result of comprehensive research carried out by Shelter Cymru, with a range of partners involved in the process and a diverse methodology. It found that all Local Authorities have a process for allocating housing to disabled people (although it would be hard to imagine a local authority with no process in place, after all, housing as always been allocated to disabled people, following an allocation process). However only 14 local authorities said that they had an accessible housing register, with the remaining reporting that:

- (i) their process has some elements of an Accessible Housing Register;
- (ii) they are in the process of developing an Accessible Housing Register; or
- (iii) they have their own internal matching process.

There was also an extensive variation between each of the Accessible Housing Registers and how they operated, as well as differences between matching systems of those local authorities that do not have an Accessible Housing Register operating in the area. The effectiveness of accessible housing registers researched also varied.

The research brought to the fore the fact that there was no industry standard or a definition of an accessible housing register, which would provide a benchmark against which an assessment could be made as to which registers should actually be classed as Accessible Housing Registers. A standard would also help assess the extent to which the Accessible Housing Registers were well-developed and effective. The research also demonstrated that monitoring of the effectiveness of individual AHR's was also rather limited.

It meant that this and further research as to the number of accessible housing registers in Wales was mainly based on local authorities own perceptions of what they thought constituted an accessible housing register and what made it effective. This was acknowledged by the local authorities which engaged with Tai Pawb as part of our Accessible Housing Register Network, events and other engagement.

In some local authorities, this lack of definition and, at times, awareness was evident when Tai Pawb began carrying out research into this area. For example, we came across local authorities where some staff members involved in allocations did not know whether they operated a register, others would confirm that a register was present whilst their colleagues reported having no accessible register present. This is not surprising, given the lack of accepted and well publicised industry standard.

---

<sup>4</sup> <https://gov.wales/statistics-and-research/accessible-social-housing/?lang=en>

The review recommended that there is an accessible housing register developed in each local authority – a recommendation based on the views and wishes of frontline staff involved in accessible housing allocation and service users.

In 2015 Tai Pawb's own research found that 15 local authorities had an Accessible Housing Register (5 of those were of a standard which we classed as good practice). Further 3 local authorities were developing an AHR and 4 had a more or less ad-hoc matching process (which we deemed to be below the minimum standard of what we would call and expect from an Accessible Housing Register).

In 2016, Welsh Government published *Local Authorities 'Common Housing Registers' and 'Accessible Housing Registers': A Report*<sup>5</sup>. Methodology was based on an online survey of local authority staff and their perceptions. 17 local authorities stated that they have an accessible housing registers. The standards reported however were varied, e.g. only three local authorities stated that their registers were continually updated and involved disabled people in development, only 5 had some dedicated staff, 2 reported not being very effective (although some of this might have been driven by factors such as general shortage of accessible housing in the area/low turnover etc).

None of the above research involved disabled people's views, expectations or experiences of accessible housing registers. This would have provided a much fuller picture of the availability and effectiveness of accessible housing registers.

In 2018, Equality and Human Rights Commission Inquiry into Housing and Disabled People<sup>6</sup> found that only half of local authorities in Wales use an Accessible Housing Register (although this was still much better than the UK level of 22% of local authorities). The methodology used was a survey (however we do not know which staff members completed it).

The inquiry made the following recommendations:

- Local authorities and Registered Social Landlords to embed independent living principles into assessment and allocations policies for social housing, to ensure real choice and control.
- Local authorities to significantly increase their knowledge of existing accessible social housing stock, and develop specialist support and information services to facilitate suitable matching.

---

<sup>5</sup> <https://gov.wales/statistics-and-research/local-authority-survey-accessible-housing-registers/?lang=en>

<sup>6</sup> <https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-wales-hidden-crisis.pdf>

- Local authorities to apply best practices on the use of Accessible Housing Registers, with the longer term aim of the use of a standard methodology across all local authorities.
- The Welsh Government to publish standards and monitor and publish effectiveness of Accessible Housing Registers

*In 2018 Wales Audit Office's Review of Housing Adaptations<sup>7</sup>, referred to:*

*poor joint working practices between housing allocation staff and grants officers to improve use of already adapted homes. Policies are often property, rather than client focussed, and rarely make the strategic link to other organisations and the wider needs of disabled and older people. This is despite the Welsh Government's Framework for Action on Independent Living that commits to improving access to adapted and accessible housing for disabled people. The Framework identifies the Housing (Wales) Act 2014 and the use of Accessible Housing Registers as key opportunities to bring about improvements. Too often, matching applicants to adapted homes via accessible homes registers does not happen. Instead adaptation policies continue to be focussed on the work of individual organisations, usually centred on processes for deciding on and managing grant applications, approvals and delivery or work to a social-housing landlord's property.*

In this respect WAO recommended that local authorities work with partner agencies (health bodies, housing associations and Care and Repair) to strengthen their strategic focus for the provision of adaptations by (...) (amongst others) *linking the system for managing and delivering adaptations with adapted housing policies and registers to make best use of already adapted homes.*

### **What is an Accessible Housing Register?**

As explained above, there is no standard and detailed definition of an accessible housing register. A good matching process can take many forms, however in simplest terms, an accessible housing register will:

- identify disabled people in need of accessible homes;
- identify accessible properties, their location and characteristics; and
- enable effective matching of people and suitable homes<sup>8</sup>

In reality an Accessible Housing Register, is not a register per se, it is rather a whole system of working to enable better housing allocation and outcomes for disabled people in need of

---

<sup>7</sup> <http://www.audit.wales/publication/housing-adaptations>

<sup>8</sup> WG Code of Guidance to Local Authorities on the Allocation of Accommodation and Homelessness 2016

accessible housing. It is clear that there is no 'typical' form of Accessible Housing Register. Rather, there are a series of matching schemes operating under the guise of an Accessible Housing Register with some registers being standalone lists with separate housing options service, others being embedded within the current waiting lists/common housing registers but coordinated by specialist/trained staff, it is also possible to have an effective accessible housing allocation as part of a choice based lettings scheme (e.g. with a coordinating role of specialist/trained staff)

The name Accessible Housing Register leads to confusion, with some providers assuming that an Accessible Housing Register is either simply a register of accessible properties or a list of disabled people waiting to be housed. Perhaps a better name would be an accessible housing allocation scheme or accessible housing service.

A well developed Accessible housing register will usually include:

- All stock categorised according to a well defined accessibility levels (corresponding to various accessibility needs of people on the waiting list)
- Specialist/trained staff – ideally including housing OT's
- Partnership/integrated working between housing, health, social services staff (delivery and strategy)
- Involvement of disabled people, including consideration of their views on their housing needs
- Data on needs feeds into housing development and longer term housing strategies
- Policies with clearly defined timescales on prioritisation, reasonable refusals (this can be different to general needs), assessment of voids, assessment of accessibility needs etc)
- Recycling of adaptations
- Open, transparent and easy to access and apply
- Definition of what constitutes a match (e.g. perfect vs best match)
- Clear standards and monitoring of waiting times, satisfaction levels, void times, complaints, costs vs benefits etc.
- (the above can differ for choiced based lettings)

### **Rationale behind accessible housing registers**

The rationale behind a (well developed) accessible housing register encompasses the following benefits:

- Better use of adapted/accessible stock or easily-adaptable stock
- Better use of adaptations (e.g. recycling of adaptations which were removed)
- Better awareness of the accessibility levels across the housing stock
- Better regional working (e.g. SARTH)



promoting equality in housing  
hybu cydraddoldeb ym maes tai

- Quicker and more effective allocation of accessible housing
- A much better insight into disabled and older people's housing needs which can be used to feed into current development and longer term strategy
- Much more integrated and citizen focused working between housing, health and social care (in terms of delivery but also strategy and long term planning)
- Expert/well trained staff better able to respond to disabled people's requirements
- Better awareness of available options amongst disabled and older people;
- Better involvement of disabled people, more information and housing options advice available
- Pooling of resources between different departments and across local authorities and RSL's to facilitate accessible housing allocation and adaptations delivery (including housing OT's)
- Accessible Housing register staff coordinating both allocation and adaptations resulting in better use of staff resources and a more comprehensive overview of the effectiveness of adaptations and allocations (and the interplay between the two)

## Recommendations and discussion

Based on the aforementioned reviews, it transpires that in Wales, we have not reached a stage where there is an accessible housing register/service in each local authority area. In fact, progress has been rather slow with various reports identifying the level of provision to be anywhere between 11 (EHRC) to 17 (WG) Accessible Housing Registers in Wales.

Moreover, for those local authorities where AHR's are reported to be in place, we have very little information as to the level of development and service provided.

We would therefore echo EHRC recommendation that, as a first step, an industry standard should be co-developed, with full involvement of housing professionals involved in the processes as well as disabled people. Such standard would help define what constitutes an effective AHR and set a benchmark against which the sector can assess itself/be assessed.

The call to develop such a standard has been supported by the local authorities who were members of Tai Pawb Accessible Housing Register Network, with professionals agreeing that such a document would help drive progress.

Tai Pawb has started this work by conducting a (currently ongoing) consultation with disabled people which we hope would feed into the standard/principles. We are also hoping to work with staff involved in accessible housing processes to further develop and agree a





promoting equality in housing  
hybu cydraddoldeb ym maes tai

standard. Our work with stakeholders has also shown that senior leadership buy-in would need to be secured for the standard to have the intended impact.

Key questions we would like to ask stakeholders are:

- Do they agree that a standard in relation to accessible housing allocation is needed?
- Are they interested in working with Tai Pawb to develop such standard?
- What form should this standard take?
- Views on best ways to secure buy-in from senior leadership?
- Views on ownership and involvement from key stakeholders (including Welsh Government)
- Any other suggestions

