About CIH

Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

Further information is available at: www.cih.org

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Introduction

CLH welcomes the Government’s commitment to improving support for carers, and the opportunity to provide comment in response to the consultation. We recognise the critical role played by informal carers, in terms of the benefit to the lives of the people they care for, and in terms of savings they make for public services such as health and social care.

The 2011 Census revealed that the number of carers had increased by 620,000 since the previous Census to 6.5 million, and Carers UK estimate that they provide £132 billion in unpaid care. Given the financial pressure on the health service and on local authority care services, the contribution from carers is only likely to increase and therefore the support that they receive to enable them to sustain their caring role will be vital going forward. This is particularly so for those 1.3 million carers who provide over 50 hours of care a week, 625,000 of whom report suffering mental and physical ill health as a result.7

Carers are affected by all of government’s policy interventions: welfare and benefits, health, social care and housing policies. A challenge for government nationally and locally is how it manages to join these up to understand the cumulative impact of measures across all these agendas. CLH will focus here on housing policy measures and how these could improve support for carers.

What is missing – making the home the foundation for good care

The consultation recognises the wide variety in age, experience and life circumstances of carers, and calls for evidence across a range of areas such as carers’ assessments, support to continue work, access to information and advice. However, a fundamental issue missing from consideration is the suitability of the home to enable people to care safely and effectively. This is particularly pertinent when considering carers who live in the same home as those they care for. However, it is also relevant for people living elsewhere in terms of security, proximity and affordability, and how the home can contribute to the carer’s wellbeing.

Providing the right physical conditions for care

The right adaptation delivered in a timely manner can help a person with limiting conditions to maintain their own capacity to undertake daily tasks as much as possible, and is also a significant factor in enabling a carer to provide personal support in a way that is safe for them and the person for whom they care, for example a parent having to carry a growing child up stairs without a stair or through floor lift.

CLH acknowledges that the value of adaptations has been recognised by the government and resulted in an increase in funding for financial help (£394 million in 2016/17 for disabled facilities grants) through the Better Care Fund. As our population is increasingly ageing, demand for support with adaptations is likely to increase; numbers of people over 75 will increase by 89.3 percent to 9.9 million by 2039, and those over 85 will double to 3.6 million.8 At the last Census 52 per cent of people over 65 reported a long term health condition/disability, compared to 50 percent in the previous Census. CLH believes that continued investment at this level is important to support carers, and that there should also be action to ensure that carers are aware of and able to access this support quickly and easily.
Building homes to support caring

Currently, there is a significant discrepancy between numbers of disabled people and the availability of homes that are accessible or easily adaptable to meet their requirements. Habinteg housing association highlights that there are 11.6 million disabled people in Britain, but only 6 per cent of homes have even basic accessibility standards to make them ‘visitable’.\textsuperscript{iv}

To address this gap, we need to ensure that the delivery of new housing includes homes that are accessible, adaptable and with high energy efficiency standards (as energy bills are a large cost implication for carers). Housing standards introduced in 2015 made both category 2 (broadly similar to Lifetime Homes standard) and category 3 (wheelchair standard) optional, which can make it difficult for local authorities to require set levels when challenged on grounds of viability for developers. We note that some areas, for example London, have been successful in setting out and maintaining requirements for a proportion of new homes to be developed to Lifetime Homes Standard and to full wheelchair accessibility standards, and believe that the carers’ strategy should encourage this approach more widely at national and local government levels.

We are concerned that the focus on delivery of homes for first time buyers in the Housing and Planning Act will make it more difficult for local authorities to require different and additional types of housing (including to higher accessibility standards, and specialist homes). We would like to see the government’s approach to supporting carers reflected in the regulations of the Act, enabling local authorities to have more flexibility to meet local housing needs that can be demonstrated through robust assessments, including the needs of disabled people and their carers.

These standards should also drive improvements in energy efficiency to support better health for people requiring care and their carers; 48 percent of carers reported cutting back on essentials including heating in the State of Caring 2016 report. Tackling energy efficiency levels in new and existing homes should be combined with welfare measures to support income levels for carers and their households.

Specialist homes

The development of specialist homes, such as extra care housing, provides an opportunity to increase the number of homes in local areas that can meet physical requirements through better space, energy and accessibility standards. These can also address the social impact of long term caring, reducing the risk of social isolation for carers, by providing the facilities and opportunities for social interaction.

There is currently concern over the future funding arrangements for new specialist housing provision due to the proposed extension of the local housing allowance (LHA) cap to rents in the social sector which includes specialist accommodation. Although the carers’ strategy will not necessarily directly address this, it might usefully look at how equalities and other impact assessments of policies incorporate issues for carers, to identify potentially unforeseen impacts for them and people requiring care.
Housing policy impacts

CIH welcomes the commitment to exclude carers entitled to Carer’s Allowance from the benefit cap; the cumulative impact of separate welfare and housing policy measures recently introduced has the potential to impact on carers’ ability to access and/or sustain the housing and other support they need to help them in their caring role.

CIH is concerned that housing measures recently proposed, such as fixed term tenancies, are likely to contribute to anxiety for carers about their ability to remain in their homes. We would encourage government, when developing regulations following the Housing and Planning Act, to enable local authorities to look flexibly at the needs of households with caring responsibilities in their areas, when applying these measures.

Local authorities and partners should also consider how their lettings and allocations policies support carers and people needing care, whether it enables them to move across housing types, tenures and areas to give and receive the support they require.

Information and advice

The Care Act 2014 and statutory guidance made progress in recognising the important contribution that housing could make to improving health and wellbeing generally. The inclusion of ‘suitability of living accommodation’ in the definition of wellbeing and therefore in the assessment process is an important step forward in improving support for carers and those for whom they care. Including information on local housing options within the duty to provide information and advice would strengthen the opportunity to support carers and households to consider how different housing options, including specialist housing, might meet their needs more effectively and reduce difficulties experienced by many long term carers; this should include information on accessible housing registers where these exist. The carers’ strategy might usefully encourage wider adoption of accessible housing registers across local areas, to facilitate better use of existing accessible and adapted homes.

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1 Carers UK, State of Caring 2016
3 https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2015-10-29
4 *Visitable* standards are level access; flush threshold; door width and circulation space; toilet at entrance level, Habinteg Briefing: Seven points about the new housing standards 2015