



promoting equality in housing  
hybu cydraddoldeb ym maes tai

## Tai Pawb

### **Response to: Consultation on the draft Disabled People's Rights Plan**

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## Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

## What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078

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## 1. Introduction

- 1.1. Tai Pawb has a long history working with disabled people as well as housing providers on provision of accessible housing allocation, adaptations, supply and support. We welcome the opportunity to respond to the above consultation – in our response, to avoid duplication and focus on our remit, we will solely focus on long term outcomes and short-term actions specifically related to **housing issues**.
- 1.2. Disabled people need to live in accessible houses that support their safety and independence in daily living. Evidence suggests that 26% of people in Wales have some form of impairment and more than 10% have a mobility impairment. The numbers of older people with physical impairments are estimated to rise by 50% between 2015 and 2035 (Auditor General for Wales 2018) but they are faced with [Hidden Housing Crisis](#) (EHRC, 2019) – shortage of accessible housing and inadequate adaptation and allocation system.
- 1.3. Our response is primarily based on:
  - [Accessible social housing in Gwent](#): a review of Allocation Systems. This report looked at allocations for accessible housing in the broadest sense, uncovering challenges, solutions and good practice related to allocation of accessible homes, adaptations systems, severe undersupply of accessible social homes, hospital discharge issues and other cross cutting themes like the social model of disability.
  - Tai Pawb's [research](#) on The Experiences of Homelessness of People with Protected characteristics which has helped inform the development of Homelessness and social allocations Bill, highlighting existing legislation and services do not always have the flexibility to deal with the individual circumstances of disabled people experiencing homelessness. Our homelessness system in the UK is overrepresented by disabled people,

survivors of domestic abuse, refugees and people with substance/alcohol use and mental health problems. If we are to end homelessness in Wales, legislation and services must be tailored for the needs of these people.

- Engagement with ca. 30 disabled social tenants attending TPAS Cymru Disability Network, including several staff members, who shared not only their lived experience but also clear calls for action and potential solutions to challenges they experience.
- Our members who comprise of 80 housing associations, local authorities, housing support providers and community organisations with an interest in equality and housing.

We have organised our response according to the long-term outcomes and relevant corresponding short-term actions relevant to housing.

## **2. Long-term outcome: Information & Awareness: Disabled people are well-informed about their housing rights, accessible housing options, and available support services.**

### Short-Term Actions for this Senedd term

Work with housing organisations to improve the dissemination of accessible housing information, including to digitally excluded people.

### Our response

- 2.1. Feedback from tenants who participated in the TPAS Cymru Disabled Tenants Network highlighted a strong desire for clearer, more accessible communication. Whilst we recognise the considerable

effort already made by housing providers, many tenants shared that key information, such as about the Disabled Facilities Grant, is not always easy to find or proactively shared. Some tenants also described documents and forms as overly complex or lengthy, creating additional stress.

- 2.2. We believe there is a shared opportunity to further improve how and when information is communicated, particularly by tailoring communication styles to individual needs and reducing the need for tenants to repeat the same personal information. We encourage investment in accessible formats and approaches that help build trust, confidence, and awareness across all communities.
- 2.3. Crucially, systems should be designed to support appropriate information sharing (with consent), especially across housing providers and local authorities. Tenants should not be asked to provide the same medical information repeatedly, which can feel repetitive and dehumanising. Members have advised that people referred to them via the local Common Housing Register often have missing or incomplete information, which can mean the opportunity to provide essential early adaptations may be missed. Importantly, tenants can be left in unsuitable accommodation for longer. Therefore, a stronger focus on improving the usability of the Common Housing register, ensuring data is complete and accurate, is required to improve the experience of tenants and providers.
- 2.4. Importantly, our research and experiences shared with us show that information must be tailored and supported, particularly for individuals with complex requirements or trauma. We support the introduction of dedicated advocacy services to help disabled people understand their housing rights and navigate systems effectively, in line with UNCRDP Articles 9, 21, and 28.

- 2.5. We also recommend that each local authority and housing provider undertakes:
- Website and information accessibility audits
  - Accessibility audits of digital platforms or processes used in the process of application for housing (e.g. bidding systems)

**3. Long term outcome: Availability of Accessible Housing: There is increased availability of affordable, adapted, and accessible housing in appropriate locations, matching demand and reducing waiting times.**

Short-Term Actions for this Senedd term

Improve provision of accessible accommodation for disabled people (and families) fleeing violence.

Review the Welsh Development Quality Requirements 2021, including how they support accessible housing.

Our response

- 3.1. Tenants' experiences continue to reflect challenges in accessing homes that meet their needs, including issues such as layout, entryway accessibility, and bathroom usability. We appreciate the significant constraints on housing stock and the ongoing work to improve supply, but feedback indicates that some households feel under pressure to accept unsuitable homes, especially in emergencies or temporary situations. Some reported being forced to relinquish pets or rely on unfit family care due to temporary housing shortages.
- 3.2. We support calls to review design standards and ensure they accommodate a wide range of needs, not just for physical access but also for everyday usability (e.g., storage for mobility aids, accessible plug

sockets). Members have told us that the better the base standards are for new builds, the easier it is to create adaptations at a later stage with minimal disruption to the tenant. It can also reduce the risk of spending time and money on features which are not required by the tenant.

- 3.3. We also echo suggestions from tenants that earlier involvement of disabled people in planning and design processes could help ensure homes work better for those living in them. Members have advised this must go together with a concerted effort to improve communication between local authorities and partners at early stages so information regarding the needs of individuals on housing registers, especially those with complex requirements, is shared effectively.
- 3.4. We strongly support increasing the supply of accessible homes and ensuring that Welsh Development Quality Requirements (WDQR) reflect the full spectrum of access needs, going beyond baseline mobility standards like Lifetime Homes to include real-world considerations, like appropriate plug-socket height, turning space, wheelchair storage, and future proofing. One tenant provided the following detailed suggestions:

*“... things that could be done to future proof housing are small things, such as putting taps with flippers as standard. Ensuring windows and doors are easy to use for disabled people, with handles at convenient heights, and east to use for anyone with limited mobility. ... electricity cupboards should be at an accessible height, not right up near the ceiling. Same with the tap to turn off the water, not in a place that you cannot reach. These small changes would allow people to be more independent, and for longer...”*

- 3.5. Members advise that it is essential to agree on a shared and consistent definition of what constitutes ‘accessible’ housing. Currently, the term often defaults to wheelchair access, which does not reflect the full range of needs, including sensory impairments, neurodiversity, and invisible

disabilities. A broader understanding would help inform better design, improve categorisation of properties, and ensure developments serve a wider spectrum of people.

- 3.6. We recommend that an appropriate Wheelchair Accessibility standard is developed as part of WDQR which could be followed and flexed to reflect individual needs of wheelchair users and their families. The new reviewed standards should also pay particular attention to multiple impairments as well as the needs of neurodiverse people, as stated.
- 3.7. Members have told us that they welcome a review of WDQR, and believe the current framework offers a strong foundation. However, what is required is greater consistency across all building standards, as at present, WDQR can conflict or create confusion with local authority planning requirements. They have asked that attention be paid to streamlining standards to promote efficiency, improve clarity and manage expectations across the sector.
- 3.8. We welcome the plan's focus on increasing supply, but note the importance of setting clear targets, timeframes, and funding commitments. Data-led mapping of current stock and gaps would support this (in our experience data on accessibility of existing housing stock is very poor). We also recommend that development strategies reflect the need for disabled people to remain close to their support networks, particularly in rural areas. Additionally, we see value in reviewing eligibility for age-restricted housing and leveraging partnerships with the private rented sector (e.g. leasing scheme Wales).
- 3.9. Funding remains a significant challenge for housing providers seeking to deliver timely and effective adaptations. Our members have highlighted the limitations of current funding options, particularly within the Physical Adaptation Grant (PAG) system. For example, PAG funding cannot currently be used to provide storage solutions; something that

can be essential for tenants' everyday accessibility and independence. Members have called for policy changes to better align funding criteria with practical needs on the ground.

- 3.10. A further concern relates to the age and adaptability of existing housing stock. Many older properties are difficult, or in some cases impossible, to adapt. Where adaptations are feasible, the costs can be substantial. Members reported that some adaptations have cost upwards of £40,000 per property, placing significant strain on their annual budgets and severely limiting the number of homes they are able to adapt each year within current PAG allocations.
- 3.11. In addition, housing associations are frequently covering the cost of minor adaptations themselves, particularly in urgent cases such as hospital discharges, where turnaround times are extremely tight. This places additional pressure on already stretched budgets and resources.
- 3.12. Funding, therefore, becomes a constant 'balancing act' for many housing associations who are juggling the urgent needs of tenants with limited and inflexible resources. We support members' calls for increased funding, greater flexibility in how adaptation grants can be used, and additional support to identify and access alternative sources of funding.

**4. Long term outcome: Accessible Housing Services: Housing-related services, including application and assessment processes, are seamless, transparent, and take a whole-system approach - especially protecting vulnerable groups such as those fleeing violence or experiencing homelessness.**

Short-Term Actions for this Senedd term

Work with local authorities to improve accessibility and coordination of housing adaptations and equipment provision.

### Our response

- 4.1. Tenants described housing adaptations as a key area for improvement. Many reported delays in assessments, difficulty understanding the process, or adaptations being declined due to cost. Whilst we acknowledge the operational and funding pressures within services, the experiences shared suggest there is scope to make the process feel more joined-up, transparent, and person-centred.
- 4.2. We would welcome further work to streamline adaptation services and improve communication between departments and with tenants. Ideas such as improving the compatibility of IT systems (whilst ensuring data protection), reducing duplication, and building in timely communication touchpoints could go a long way in improving experiences for both tenants and staff.
- 4.3. Our research highlighted variation in how housing allocation and adaptation systems work across tenures and regions. We are pleased to see the proposed duty to develop Accessible Housing Registers in the Homelessness and Social Housing Allocations Bill, however, this needs to be coupled with strong framework for accessible housing allocations (data on stock, proactive accessibility categorisation of stock, skills and increased capacity) and improving transparency of prioritisation processes. Incorporating early Occupational Therapy (OT) assessments and accessibility categorisation standards could help match people to suitable properties. Attention should also be given to transitions from hospital; coordinated discharge services and accessible temporary housing would reduce risk of readmission or homelessness, as highlighted in [our response to](#) Hospital Discharge inquiry by the Housing and Local Government committee.

- 4.4. Members have also raised concerns about inefficiencies in OT assessments, stating it is common for multiple adaptations to be made in the same property within a short period due to earlier assessments not covering all required changes. This reactive approach increases costs, makes forward planning difficult, and can strain limited resources. These challenges are compounded by known difficulties in recruiting and retaining OTs, pointing to an urgent need for additional investment and a more joined-up, whole-system approach to assessments and adaptations.
- 4.5. Whilst OT involvement is often essential, our members have cautioned against over-reliance on professional assessments for relatively minor adaptations that they feel could be resolved more efficiently between tenants and housing providers. They state that in some cases, requiring OT input has led to unnecessary delays and added costs. Additionally, the process can become overly medicalised, with decisions driven more by clinical opinion than by the voice of the individual. Members have told us that at times, OTs have insisted on specific equipment due to a person's condition without fully engaging with them on what would genuinely improve their daily life, which can lead to expensive equipment going unused and taking up valuable space in the home. Therefore, a balanced and nuanced approach is required.

**5. Long term outcome: Inclusive Policy Development: Housing strategies and policies are shaped through meaningful involvement of disabled people, taking into account intersectional needs.**

Short-Term Actions for this Senedd term

Engage with disabled people's organisations to co-design and deliver training to housing organisations.

Engage with disabled people from underrepresented communities (e.g. Gypsy, Roma, Traveller communities) to identify housing barriers and co-produce solutions.

### Our response

- 5.1. We welcome the plan's emphasis on intersectionality and advise that this must reflect the wide-ranging nature of disability and associated or overlapping access needs. This includes hidden disabilities, neurodivergence, learning difficulties, sensory impairments, mental health issues, and long-term health conditions. Many disabled people also have multiple and intersecting needs, including caring responsibilities for others with disabilities.
- 5.2. A recurring theme in tenant feedback was the importance of involving people with lived experience of disability in the design and development of services and strategies. Whilst there is much positive work across the sector, some tenants reported feeling that their voices are not consistently reflected in decision-making. In particular, reductions in engagement structures post-pandemic have left a noticeable gap.
- 5.3. We strongly support efforts to strengthen and rebuild inclusive tenant voice mechanisms. Co-production approaches, especially those that recognise the diversity and intersectionality within disabled communities, can bring immense value. To be effective, these approaches must foster safe and encouraging environments for participation, particularly for those who may feel disillusioned or unheard.
- 5.4. We also support the emphasis on using data to understand and respond to disabled people's housing experiences. This should include both quantitative and qualitative data, with regular monitoring of allocation

systems and better disaggregation of survey data to highlight intersectional impacts. We echo wider sector calls, such as those from Community Housing Cymru (CHC), for more comprehensive data to reveal the full extent of unmet need, especially through insights drawn directly from disabled people themselves. Members have told us that there is currently too much inconsistency between how data is collected, used and shared across local authorities, which presents a significant challenge.

- 5.5. Finally, effective governance is essential. This includes measurable standards, accessible complaints procedures, and clear mechanisms for redress. We encourage the development of transparent monitoring frameworks that track outcomes for disabled tenants and residents. Governance structures should also ensure cross-tenure equity in service delivery, including adaptations, and promote consistency across Wales.

## **6. Long term outcome: Effective Governance: Local authorities and housing providers operate with robust governance, accountability and data monitoring around accessible housing provision.**

### Short-Term Actions for this Senedd term

(Implicit) Ensure effective oversight through co-production, policy review (e.g. WDQR), and engagement with disabled communities.

### Our response

- 6.1. Ensuring robust governance and accountability around accessible housing provision is essential to achieving long-term, sustainable change. Staff who participated in the TPAS network described some of the systemic challenges they face, such as fragmented systems and inconsistent recording of access needs, which can affect service delivery and monitoring.

- 6.2. We recommend building on existing good practice by developing more consistent ways of gathering and using data on accessibility and outcomes. Importantly, this should be done in a way that supports staff to work effectively and ensures tenants feel respected and understood. Clarity around responsibilities, shared goals, and collective learning will all help strengthen confidence in the system.
- 6.3. Effective governance requires measurable standards, accessible complaints procedures, and clear mechanisms for redress. We encourage the introduction of transparent monitoring frameworks that include outcomes for disabled tenants and residents. Governance structures should also support cross-tenure equity in service delivery, including adaptations, and ensure consistency across Wales.

**7. Long term outcome: Supportive Staff: Those involved in housing provision—public officials, landlords, housing staff—are trained in the Social Model of Disability and understand disabled people’s needs.**

Short-Term Actions for this Senedd term

Work with disabled people’s organisations to co-design and deliver Social Model of Disability training for housing sector staff.

Our response

- 7.1. Tenants spoke positively about many of the staff they encountered but also shared that interactions can sometimes feel impersonal or overly process-driven. Some described feeling like “just a number” or being asked the same questions repeatedly; experiences that can be frustrating and disempowering. Staff themselves reflected on the emotional demands of their roles, noting that high workloads and

system constraints can lead to emotional fatigue and limit the quality of interactions.

- 7.2. We fully support further investment in training and support for housing staff, particularly through the lens of the Social Model of Disability, alongside inclusive, empathy-based, and trauma-informed approaches. This has been strongly echoed by our members, who are keen to access more training and support opportunities but also emphasize that training alone will not be enough. Without addressing the shortage of accessible homes and closing wider funding gaps, outcomes for disabled people and those with access needs may remain limited.
- 7.3. Whilst supportive of further training, members have noted the increasing demands in training requirements and expressed some concern that these remain cost-effective for smaller organisations. We welcome proposals to expand training and recommend that it be mandatory, regularly refreshed, and co-designed with disabled people and representative organisations. In addition to covering the Social Model of Disability, training should incorporate inclusive design principles, cultural competence, and practical tools for staff to respond confidently and sensitively to diverse needs.
- 7.4. We also recognise the importance of supporting staff wellbeing to enable them to provide high-quality, person-centered services whilst managing the emotional and practical challenges of their roles. Investment in peer learning, joint working, and wellbeing initiatives can help prevent burnout and strengthen both staff experience and service delivery.
- 7.5. Our members have also highlighted the need for more equitable access to training and networking opportunities across Wales. Many Welsh Government-led events, including those on the Anti-Racist Wales Action Plan, have taken place only in Cardiff, with limited online access or

regional alternatives. This restricts the ability of organisations across Wales to learn from one another and implement action plans effectively.

## 8. Conclusion.

- 8.1. Tai Pawb welcomes the plan and are broadly supportive of the direction of travel it sets out. It represents a valuable opportunity to address long-standing inequalities in housing for disabled people in Wales. Improving housing outcomes for disabled people requires a shift in culture, systems, and practice. Our response highlights the urgent need for stronger data collection, effective governance, and clear accountability to track progress and drive improvement.
- 8.2. We call for a move toward more joined-up, streamlined and person-centred approaches that prioritise dignity, lived experience, and trust. This includes better integration across housing, health and social care, investment in a skilled and supported workforce, and a commitment to meaningfully co-producing services with disabled people.
- 8.3. To make this vision a reality, we urge Welsh Government and partners to focus on:
  - Robust data and governance frameworks
  - Embedding rights-based, person-led approaches
  - Improving cross-sector coordination
  - Supporting the workforce to deliver
  - Fostering a culture shift across systems

Only through these changes can we create a housing system that truly meets the needs of all.

8.3 We believe that the best way to deliver these is to make progress with incorporation of the UNCRPD in Wales, driving the policy, cultural and legislative changes required to achieve the goals of the plan.