

## Cymorth Cymru consultation response

### Welsh Government consultation:

### Action on disability: the right to independent living

#### About Cymorth Cymru:

Cymorth Cymru is the umbrella body for providers of homelessness and housing related support services in Wales. Cymorth Cymru acts as the 'voice of the sector', influencing the development and implementation of policy that affects our members and the people they support. We work in partnership with members and other stakeholders to prevent and reduce homelessness and improve the quality of life for people who are marginalised or at risk of housing crisis across Wales.

Cymorth has approximately 100 members across Wales, made up of third sector organisations, housing associations and local authorities. Our members work with a wide range of people, including people who are homeless, or at risk of homelessness; families fleeing domestic abuse; people dealing with mental or physical health problems; people with learning disabilities; people with alcohol or drug problems; refugees and people seeking asylum; care leavers and other vulnerable young people; and older people in need of support.

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**Cymorth Cymru welcomes the opportunity to respond to this consultation. The aim of helping people live independently in their own home is one of our founding principles as an organisation, and across Wales this aim has been delivered by our members through, but not limited to, the Supporting People Programme.**

We are supportive of much of the content, and in particular we are advocates of the social model of disability that has been consistently championed by Welsh Government – and which is repeated in this consultation as well. We also warmly welcome the recognition by Welsh Government of the wide range of barriers to independent living such as attitudinal, institutional, communication, and environmental. This complex mix of challenges and barriers are a tough proposition to address, but we are pleased that they are being recognised from the outset.

There are specific additions or elements we want Welsh Government to consider:

### **Chapter 1: Definition of disability**

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We believe it might be useful to include a definition of disability in Chapter 1 that makes it clear that this Framework and Action Plan is not limited to visible, physical disabilities. To avoid ambiguity, or the risk that organisations, services or agencies focus on one specific 'type' of disability, we would argue that this definition should explicitly include 'hidden disabilities' as well as visible physical disabilities. This should include mental health problems, learning disabilities, autistic spectrum disorders or longer-term health conditions which may be less visible.

### **Additions to 'Housing' section**

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Subscribing to the social model of disability, we need to recognise that barriers to housing make it difficult if not impossible to live independently. While the section on Housing (page 22) makes reference to adaptations, it may be useful to include examples of other barriers that prevent people with a wide range of disabilities from accessing and maintaining housing.

For example, the location of housing can have an enormous impact on whether someone with a severe and enduring mental health problem is able to live independently. Proximity to health, third sector support services, family and friends, and social activities could have a huge impact on their ability to manage their mental health and continue to live independently. Housing allocation policies should be mindful of these issues as forcing someone to live in an area without access to these services could lead to crises and the loss of independent living.

The provision of housing-related support services (funded currently through the Supporting People Programme), supported accommodation and supported living schemes are often critical to enabling people with a range of disabilities to live independently in their communities. These services prevent people from becoming homeless but also prevent some people with mental health problems and learning disabilities from living in more restricted, institutionalised environments and in residential care settings.

There are other aspects of housing that can act as both a barrier and a solution. Welfare reform, for example, is a clear challenge facing people with all forms of disabilities, and they limit the ability of individuals to manage and maintain their tenancies, or afford housing at all. We were heartened by the response the First Minister gave in the Senedd, about the potential devolution of elements of welfare,

particularly the administration of Universal Credit. This has the potential to play a huge role in reducing some of the negative impacts of welfare reform on people's ability to live independently.

Bearing in mind the barriers to employment and discrimination that disabled people can face, the provision of enough affordable and social housing is a key factor that could affect whether someone is able to live independently. The Welsh Government's work on independent living should seek to influence the Affordable Housing Review to encourage the provision of housing that enables and supports independent living. This would also include the importance of design and location. Independent living must be about the services *around* and *near* the housing, and not just the accommodation itself. The importance of proximity to a variety of services and transport links cannot be understated, particularly in helping accommodation become more affordable.

### **Additions and amendments to the Action Plan**

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We welcome the cross-government approach to the action plan and welcome much of its content. We have the following suggested additions:

Firstly, we suggest the following addition, possibly after (9):

*Utilise mechanisms such as the new Housing Support Grant guidance and other planning processes to ensure that new supported housing, sheltered housing and independent living schemes are developed close to health services, social services, third sector support services, services to reduce social isolation, family/friends/support networks, and transport links to ensure that housing is sustainable for people with physical disabilities, long term health problems, mental health problems and learning disabilities.*

Secondly, suggest the following addition to action (10):

*Continue to provide housing related support, supported accommodation and supported living schemes to help disabled people to live independently in their own home, including people with physical disabilities, learning disabilities, mental health problems, chronic illness and autistic spectrum disorders.*

Thirdly, we suggest a new action after (10):

*Ensure that housing-related support is trauma-informed and psychologically informed. Evidence from Public Health Wales demonstrates that individuals who have experienced trauma in their childhood are much more likely to be engaging in services as they are older. Therefore it is vital that services at all levels are trained to recognise that people with some disabilities such as mental health problems may have experienced trauma, and so services need to be psychologically informed to minimise negative impact.*

*Ensure that Positive Behavioural Support as a methodology is encouraged and adopted for learning disability services where challenging behaviour is seen more often.*

We are pleased to be able to respond to this consultation, and welcome the wide ranging and encouraging consideration of the issues. With specific additions noted above, and a broader, all-encompassing definition of disability, we are happy to support this policy direction.