



Age Action Ireland Submission to the Open Ended Working Group on Ageing 14: Substantive Input on the Built Environment

Age Action is Ireland's leading advocacy organisation promoting equality for all of us as we age



Rialtas na hÉireann
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Accessibility, Infrastructure and Habitat.

Housing in Older Age

Older persons in Ireland disproportionately occupy inadequate housing, with the most common form of inadequacy being poor insulation. This likely contributes to the high level of excess winter mortality Ireland reports relative to other EU countries. The state offers Housing Adaptation Grants for Older People, but the size of the grants and the means testing income thresholds do not provide people with enough support to get real work done on their homes, and have been unresponsive to recent inflation and increased cost of construction. The administrative processes disincentivize participation, for example if someone has failed to find a tradesperson to implement the work they have received the grant for within three months, they lose the grant and have to apply all over again. Tenants in the private rental sector cannot access these grants.

The number of older persons in the private rental sector is growing, as homeownership becomes more prohibitive. The State Pension is not intended, and is insufficient for covering average rents. Given that most older persons rely primarily if not exclusively on the State Pension for their income, many older renters are forced to remain in work. The State has put in place inadequate controls on rent. In Q3 of 2023, new rents were 17.7% higher than existing rents, representative of the significant increases the sector has been seeing for years.

Few disabled people rent privately, given the difficulties in finding affordable accessible housing. Yet many disabled people acquired disability in older age. This means that there will be people entering the private rental sector with no pronounced accessibility or mobility needs, staying in the private rental sector into older age, and then developing such needs. Older persons in lower socio-economic groups are significantly more likely to develop disabilities. Additional costs associated with disability are already steep without factoring in rent.

Current regulations for quality of housing in the private rental sectors generally set fair and decent standards. The problem is enforcement. In 2020, only 6.73% of registered tenancies had been inspected, and the overall rate of compliance was 33%, with some areas reporting zero compliance. Due to legislative changes, inspection rates are no longer made public.

Accessing Transport in Older Age

Ireland is sparsely populated in comparison with other European countries and has many isolated, one-off houses. Most Irish households are car dependent and many are not served by local public transport schemes, making the free transport for older persons a benefit only in theory, as it does not extend to taxis. There are no government schemes supporting transport to and from hospitals. Nearly 50% of women aged 65+ in rural areas, and around 28% of men, report 'unmet' transport needs. The minimum cost of running a car is €75+ per week, 27% of the maximum rate Contributory State Pension for a person living alone. 70% of older persons without a driving licence are women. More than half of all women aged 75 or older do not have one. Driving licences are restricted for people aged 75

and older, an example of institutional age discrimination not based in evidence, given the fact that they are one of the safest demographics of drivers.

Access to Justice

The Residential Tenancies Board (RTB) provides dispute resolution for landlords and tenants, which can culminate in a public hearing by the Tenancy Tribunal, and result in legally binding determinations. The RTB has appointed an access officer who supports persons with disabilities in using the RTB services. Informal complaints to the RTB, known as ‘concerns’, are to be made through email or phones. While formal complaint forms can be posted to an address, it seems they can only be initially accessed via the RTB’s website, which likely presents difficulties for the 60% of persons aged 60 or older who lack internet access or basic digital skills. Any system in which accessing justice can only be accomplished digitally jeopardizes the rights of older persons. Both applications and appeals of dispute resolution cost more if they are done via post rather than online, which discriminates against most older persons. An application costs €15 online and €25 via post. An appeal costs €85 online and €100 via post.

The Workplace Relations Commission (WRC) oversees all complaints taken under equality legislation, including discrimination cases relating to housing. The WRC also provides mediation and conciliation services. The Workplace Relations Commission provides their publications in Braille, large-print and audio format. Their website is screen-reader friendly and designed to be as accessible as possible. They have an access officer to support service users with disabilities who can be contacted via email or phone. While their mediation, conciliation, and advisory services can be accessed through the post, complaints under equality legislation can only be made via an online form on their website.