

Adaptations Policy

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Review period	2 years	Next review due by:	31 July 2020

1 Purpose

- 1.1 To set out our approach to the provision of adaptations in our homes and our intention to support the wellbeing and independence of our tenants, either in continued occupancy of their current home or in another property that is suitably adapted or that can be adapted to meet their needs.
- 1.2 The purpose is to ensure consistency, clarity and fairness in our approach when dealing with requests for adaptations in our homes,

2 References

- 2.1 'Delivering Housing Adaptations in Buckinghamshire' (agreed by the Bucks Joint Housing Adaptations Group in April 2007)
- 2.2 'Delivering Housing Adaptations for Disabled People: A Good Practice Guide' (June 2006)
- 2.3 'How to make effective use of adapted properties' (Chartered Institute of Housing, January 2014)
- 2.4 "Home Adaptations for Disabled People' (Home Adaptations Consortium 2013).
- 2.5 Home Adaptations: The Care Act 2014 and Related Provision across the United Kingdom (College of Occupational Therapists Ltd 2016)

3 Responsibilities

- 3.1 Assessment of disability need is primarily the responsibility of Buckinghamshire County Council (BCC). Twenty11 receives recommendation for adaptations from BCC Community Occupational Therapy Service.
- 3.2 The table below sets out the roles and responsibilities when we receive adaptation requests: -

Position	Role in process
Head of Property	Holds budget and determines spend, responsible for policy implementation and approval of adaptations over £10,000
Housing Adaptations and Lettings Panel (HALP)	Approval of adaptations up to £10,000 and up to £1,000 for new Twenty11 tenants. Consideration of adaptations requests over £10,000 and recommendation made to Head of Property or Assistant Director of Operations for decision

Project Manager and Housing Occupational Therapist	Designs adaptations, specification, compliance, cost and considers feasibility. Approval of adaptations up to £5,000
Relationship Advisors	Log adaptation requests and raise minor works orders (under £500)
Tenants	Reporting maintenance problems in a timely manner in order to ensure the longevity of adaptations

4 Legal and regulatory framework

4.1 This policy has been developed in accordance with the following acts of Parliament:

Care Act 2014

(Applies to adult social care in England)

<http://www.legislation.gov.uk/ukpga/2014/23/>

The Disability Discrimination Act 2005

<http://www.legislation.gov.uk/ukpga/1995/50/contents>

The Housing Grants, Construction and Regeneration Act (1996) as amended by the Regulatory Reform Order (2002)

<http://www.legislation.gov.uk/ukpga/1996/53/contents>

The Equality Act 2010

<http://www.legislation.gov.uk/ukpga/2010/15/section/6>

Housing Act (1980) & (1985)

<http://www.legislation.gov.uk/ukpga/2004/34/contents>

[Chronically Sick and Disabled Persons Act 1970](http://www.legislation.gov.uk/ukpga/1970/44)

(Applies to children in England)

<http://www.legislation.gov.uk/ukpga/1970/44>

Children Act 1989

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

5 Definitions

5.1 Adaptations are alterations or additions to any aspect of a dwelling to make it easier or safer for use by a person with a disability.

5.2 A person is formally defined as having a disability under the Equality Act 2010 if they have a 'physical or mental impairment', and 'the impairment has a substantial

and long-term adverse effect on (the person's) ability to carry out normal day-to-day activities.'

5.3 A person may be eligible for help under this policy even if they are not registered as disabled, upon recommendation by an Occupational Therapist.

5.4 Other eligibility criteria which apply to this policy are:

- Those identified by social care, primarily the Occupational Therapy service in respect of the Care Act 2014.
- Applicants must be a named tenant on our Tenancy Agreement or registered on our records as part of the tenant's household and living at the property on a permanent basis. If they are aged over 18 years, they should also be registered on the Council Tax records and/or electoral roll for that address. Individuals who have no recourse to public funds or do not have the right to rent will not be eligible for assistance under the terms of this policy.
- In cases where a child is disabled and the parents are separated, adaptation works will usually only be completed at the property of principal residence (normally the residence of the parent who is in receipt of child benefit for that child).
- Where tenants have a starter tenancy or are new tenants nominated through Bucks Home Choice, works up to the value of £1,000 may be agreed when recommended by a Community Occupational Therapist or Housing Occupational Therapist. Works over this value would be considered by the Housing Adaptation and Lettings Panel (HALP) - See Appendix A.
- Applicants who are registered for a transfer will be considered on their individual merit. This will include whether the applicant is requesting to move into a property which is not suitable or less suitable for their needs, in which case they may not be eligible for assistance under this policy.
- We reserve the right to decline requests for adaptations where the cost of the work is considered too high, or not reasonable or practical, and the tenant can apply to move to a more suitable property. This also applies to requests for extensions or other changes to the tenant's home due to the household's welfare, social, or medical needs and circumstances such as over-crowding.
- We reserve the right to decline requests for adaptations for applicants who have moved from a previously adapted property or a property that was considered to be suitable for their needs.
- Tenants who are applying for works to their current home and are also registered for a transfer to another property, would need to withdraw their application to move before works will be carried out on their current home.

- Where tenants are in arrears, a decision will be made on a case by case basis, including a risk review from our Home Budgeting service, taking into account their individual circumstances and repayment history.
- We will not usually carry out adaptations for persons transferring from another social landlord to one of our homes unless their circumstances have changed significantly after they became our tenant.

5.4 Adaptations are categorised as follows:

Category	Definition	Target completion
Minor	£0 - £500	12 days
Routine	£500+	27 days
Complex	Includes where external factors impact on completion or specialist works required	Individual targets set

6 Policy statement

- 6.1 Adaptations will only be undertaken on tenanted homes or in communal areas for the benefit of our tenants and/or family members living in their home.
- Adaptations will not be carried out in any property, where:
 - there is a severe tenancy breach
 - the layout and/or location of the current property make it unsuitable
 - the works would negatively affect the future let-ability of the property
 - The applicant is under or over occupying and they can apply for suitable alternative accommodation
 - The household is being investigated for possible fraud or non-occupation
 - The works would not resolve the issue for the long-term or make a significant improvement to the current situation
- 6.2 Where disposal of a property is under consideration, applications for adaptations will be considered on a case by case basis.
- 6.3 We will take all reasonable and practicable measures to provide housing that is suitable for meeting the needs of our tenants or members of their household who become disabled or who have a disability that affects the enjoyment of their home. We will ensure customer choices are available in respect of materials and products, where possible. We will work with customers to ensure that the adaptations provided are suitable for their current needs, with a view taken to any changing or future needs. Social Services have a duty under the Care Act 2014 to arrange practical assistance in the home, as well as any adaptations designed to secure

greater safety, comfort or convenience. In Buckinghamshire the County Council Occupational Therapy Team provide this service.

- 6.4 We will actively seek to understand any specific needs in respect of adaptations to ensure that the correct standard and type of home is offered. We will not offer a tenancy if a property is unsuitable or if it cannot be adapted reasonably and practically to meet the needs of the proposed new tenant. If the estimated costs are over £1,000 works will not usually be agreed for new tenants, including those from another social landlord. In exceptional cases the decision will be made by HALP bearing in mind that priority for spend will be for existing Twenty11 tenants.
- 6.5 We will work in partnership with Wycombe District Council (and Bucks Home Choice) to assess applicants' needs and seek to match properties appropriately.
- 6.6 We will not directly allocate adapted properties to applicants, except in circumstances described in section 6.7 below. For cases where a move is required, the customer will be advised to register on the transfer list to ensure their circumstances are considered alongside any other households who may have comparable needs. The household's needs will then be assessed and the application banded to take account of requirements. The severe shortage of our properties means it is critical that we treat everyone the same. As well as ensuring a consistent approach, this will enable the applicant to bid for other properties (not just Twenty11 homes). Where a move to a larger property is required we will undertake a financial viability assessment to establish whether it is affordable, including whether there are any exemptions from the benefit cap. Priority will be given according to the banding of each case as assessed on Bucks Home Choice, with those with the highest bands receiving priority when bidding for another property. Where banding is the same then the application date will determine which case is given priority.
- 6.7 In exceptional circumstances we may consider making a direct offer. A direct offer will only be considered where:
- a) Our tenant is registered on Bucks Home Choice and has been awarded a medical priority
 - b) They have been bidding for other suitable properties but have been unsuccessful.
 - c) An adapted property or a property suitable for adaptation becomes available and the cost of works is less than adaptations to their current home.
- 6.8 A direct offer may also be considered where a Twenty11 tenant who occupies an adapted property no longer requires such features and the property would be better suited to others e.g. where the person requiring the adaptations no longer lives in the property.

- 6.9 Where a direct offer is agreed we will make one suitable offer only. If a suitable offer is refused no further direct offer will be considered unless there is a significant change in circumstances. If an applicant is subsequently successful in bidding for another property that requires adaptations, we may not agree to fund the work if the cost is greater than those required at the property they refused.
- 6.10 HALP will consider all direct let requests where the cost of adaptation works required is up to £10,000. For any requests where the cost is greater than this the decision will be made by the Head of Property or the Assistant Director.
- 6.11 Where homes need to be adapted we will aim to complete works according to agreed timescales which are commensurate with the complexity of the work.
- 6.12 We will ensure that all adaptation works carried out represent value for money, are of good quality, meet the needs and aspirations of tenants and minimise future maintenance costs.
- 6.13 If our Housing, Adaptations and Lettings Panel (HALP) do not consider the proposed adaptation works will provide value for money, or if we cannot obtain planning consent for the adaptation, we will advise the applicant to apply for suitable alternative accommodation. This may be a property from within our stock, or alternatively from another provider, where available. We will recommend that the tenant registers to transfer to a more suitable property via the Bucks Home Choice process. (HALP Terms of Reference and Guiding Principles are attached as Appendix A)
- 6.14 Assessment for most adaptations is undertaken by Buckinghamshire County Council Community Occupational Therapy Team or specialist services. Referrals are also accepted from Occupational Therapists working in Paediatric Services, the Learning Disability Team, the Falls Programme Team and Rehabilitation Services. The Occupational Therapist will advise if priority needs to be given due to individual circumstances.
- 6.15 We will provide tenants with such choice of product as is reasonable within the context of the results of a joint assessment (with the tenant) of their particular needs, as well as other factors such as building regulations and value for money.
- 6.16 We recycle major adaptations wherever possible, including stair lifts, wash and dry toilets and modular ramps, etc.
- 6.17 We store information about adaptations on our asset management database. In the event of requests for housing from disabled applicants we endeavour to assess their needs by undertaking a visit to the property with them and the Housing Occupational Therapist (HOT).
- 6.18 We are responsible for the maintenance and replacement of all the equipment our approved contractors install, unless we agree otherwise with the tenant and

Buckinghamshire County Council's Social Services. We will only replace or maintain equipment where:

- a) the equipment requires it and
- b) the tenant for whom the property was originally adapted is still living in the property

- 6.19 Some minor works adaptations are undertaken by Bucks County Council Occupational Therapy Service in line with the division of responsibility guidance between the Council and local housing authorities. This division is explained in more detail in 'Delivering Housing Adaptations in Buckinghamshire' (see 2.1). We record all 3rd party contractor installations on our housing management database apart from minor works such as internal grab rails, and ensure compliance checks are carried out as required to all adaptations we take responsibility for. In the event that a 3rd party installation triggers an ongoing compliancy or servicing issue, evidence that this is occurring should be provided directly to Twenty11.
- 6.20 We will work with other providers of equipment to ensure that relevant works are properly undertaken and that where necessary appropriate certification is provided and that our property records are kept up to date. Works approval must be granted before any works are undertaken in our homes except for minor adaptations carried out by Bucks County Council directly e.g. internal grab rails.
- 6.21 For significant works and adaptations such as bedroom extensions, we will advise the customer of any likely increase in rent and council tax charges as a result of such works and ensure that the property remains affordable before undertaking any work. We will review the rent on completion. If equipment is installed which has specific maintenance requirements, we will consider whether service charges would apply.
- 6.22 On completion of the work we will carry out a customer satisfaction assessment to help us improve our customer service performance.

7.0 Further policy details

- 7.1 We will consider using the adaptations budget, when required, to provide major works as part of any agreed transfer. There will normally be an upper limit for such works although this may vary from year to year depending on overall funding.
- 7.2. In considering funding for adaptations, we will also take into account the tenant's income/capital, and if appropriate will expect them to contribute or fund adaptations/extensions themselves, for example if they have significant savings.
- 7.3 There will be a limit to the total amount of spend per annum in accordance with our budget, rather than the number of cases considered. We will take into account the maximum limits applicable to Disabled Facilities Grant awards when considering requests to fund adaptation works from our own budget, although we will consider

each application on a case by case basis. The budget allocated will be inclusive of specialist advice or additional support requirements, such as architects or surveyors fees.

- 7.4 There will be a value for money judgement made on all agreed cases to ensure that the best available use of any allocated budget is made, as we need to balance the needs of the individual with the rest of our tenants and make appropriate use of our limited funds. We will also consider any external funding as part of this review, and consider any innovative solutions such as mobile pods or temporary structures, which could replace traditional construction methods such as brick and block extensions.
- 7.5 If a property is refused the tenant is entitled to remain on Bucks Home Choice and can continue bidding in accordance with the Bucks Home Choice policy. It is therefore the tenant's responsibility to find a suitably adapted property themselves or one with the necessary attributes that meets their needs.
- 7.6 Any offer made and work undertaken will be subject to confirming that the property is suitable. The tenant will be expected to sign their new tenancy agreement for the property before works commence.
- 7.7 Where medical information in support of any adaptations is received appropriate information and advice may be sought from an independent medical specialist before we decide whether to fund the requested works or consider other options.
- 7.8 Requests for works reaching the upper value limit will be approved by the Assistant Director of Operations.

8 Resources management

- 8.1 An annual review will take place on the allocation of available budget.
- 8.2 All work will be undertaken by trained staff working for specialist contractors.

9 Related policies & Procedures

- Red Kite Group Older Persons Strategy
- Red Kite Group Compliance Policies
- Red Kite Group Repairs Policy
- HALP terms of reference
- Red Kite Group Inclusion and Wellbeing Strategy
- Twenty11 Allocations Policy
- Twenty11 Tenancy Policy
- Red Kite Group Mobility Scooters Policy

10 Expected legislative/environmental changes

- 10.1 There are no known changes expected which will affect the Adaptations Policy however, we are continually reviewing all areas of expenditure to ensure that we deliver priority and value for money services.

11 Publicising this Policy

We will advertise the details of this policy in the following documents:

- Tenant and Leaseholder Handbook
- Tenant and Leaseholder Newsletter
- Our website
- Policy briefings
- Training briefings

12 Review

This policy will be reviewed when:

- There are significant changes to legislation;
- There are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.
- In any event this policy will be reviewed no later than June 2020.

13 Performance Indicators

We will manage the delivery and performance through the use of specific performance indicators including:

- time taken to complete adaptations from referral to completion
- number of adaptations completed by type
- customer satisfaction
- quality of work, by inspection

14 Appeals and Complaints

If a customer disagrees with an assessment outcome by the Housing Occupational Therapist or HALP, or any decision made by Twenty11 regarding the nature of an adaptation, or the suitability of a property, and the dispute cannot be resolved informally, the customer may request an appeal.

The appeal would normally be heard by a Head of Service or Assistant Director from the Operations Hub who has not been previously involved in the case. Any review of the Panel's decision that has been requested by a tenant or their advocate must be considered within 28 working days of all the information being provided. There is no further internal stage of appeal for a tenant. An appeal would generally only overturn the original decision if this policy had not been

followed, the correct process had not been undertaken, or the decision was not considered as reasonable.

15 Equality and Diversity

All involved recognise our commitment to actively work towards the elimination of discrimination on the basis of the protected characteristics of age, sex, sexual orientation, disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.