

**ADAPTATIONS POLICY**

## **1 Purpose**

- 1.1 This Adaptations Policy sets out Twenty11's approach to the provision of adaptations and specialist equipment in our homes and our intention to support the wellbeing and independence of our tenants, either in continued occupancy of their own home or in another property that is suitably adapted or that can be adapted to meet their needs.
- 1.2 Our aim is to ensure consistency, clarity and fairness in our approach when dealing with requests for adaptations in our homes.

## **2 Definitions**

This procedure relates to Twenty11.

- 2.1 Adaptations are alterations or additions including the supply of specialist equipment to any aspect of a dwelling to make it easier or safer for use by a disabled person.
- 2.2 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.'
- 2.3 A person may be eligible for help under this policy even if they are not registered as disabled, upon recommendation by an Occupational Therapist.
- 2.4 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).
  - Applicants who are registered for a transfer or mutual exchange will each 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 or mutual exchange 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, considering 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.

## 2.5 Categories:

Category	Definition	Target completion (working days) from date of request
Minor	£0 - £1000	12 days
*Routine	£1000+	27 days
Complex	Includes where external factors impact on completion or specialist works required	Individual targets set

\* Housing Adaptations and Lettings Panel meeting schedule can affect the delivery to target

## 3 Responsibilities

- 3.1 Assessment of disability need is primarily the responsibility of Buckinghamshire County Council (BCC). The Twenty11 receives recommendation for adaptations from BCC Community Occupational Therapy Service.

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 to Head of Property or Assistant Director (Technical)
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 £1000)

<b>Position</b>	<b>Role in process</b>
Tenants	Reports maintenance problems in a timely manner to ensure the longevity of adaptations

## **4 Legal Framework**

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

- Care Act 2014
- The Equality Act 2010
- Children Act 1989
- Housing Act 2004

## **5 Key Principles**

### *5.1 Allocating Homes*

Where disposal of a property is under consideration, applications for adaptations will be considered on a case by case basis.

5.2 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 tenant choices are available in respect of materials and products, where possible. We will work with tenants 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. Buckinghamshire County Council's Occupational Therapy Team provide this service.

5.3 We will actively seek to understand any specific needs 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 £1000 works will not usually be agreed for new tenants, including those from another social landlord. In exceptional cases the decision to undertake works over £1,000 may be agreed by HALP. Priority for spend will generally always be for existing Twenty11 tenants.

5.4 We will work in partnership with the local authority (and Bucks Home Choice) to assess applicants' needs and seek to match properties appropriately.

5.5 We will not directly allocate adapted properties to applicants, except in circumstances described in section 6.6 below, all on a case by case basis to prevent bed blocking (priority / management moves). For cases where a move is required, the tenant 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.

5.6 The severe shortage of our properties means it is critical that we treat everyone according to their needs and fairly. 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.

- 5.7 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.
- 5.8 In exceptional circumstances we may consider making a direct offer. A direct offer will normally 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.
- 5.9 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.
- 5.10 On occasion, we may decide to make a direct offer without conditions 5.8 a, b and c being met because it will enable us to make investment choices that deliver value for money for Red Kite. This is consistent with the offer flexibility set out in our Allocations Policy.
- 5.11 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.
- 5.12 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.
- 5.13 Housing Adaptations and Lettings Panel (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 – Technical.
- 5.14 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.
- 5.15 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 and conform to all relevant standards.
- 5.16 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).

- 5.17 Assessment for most adaptations is undertaken by Buckinghamshire County Council Community Occupational Therapy Team, the second option from private Occupational Therapy in exceptional circumstances 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.
- 5.18 We will provide tenants with such choice of product as those offered to other tenants but there will be some products due to their specialist nature where choice will be limited. These will be 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.
- 5.19 We recycle major adaptations wherever possible, practical and safe to do so, including stair lifts, wash and dry toilets and modular ramps, etc. All equipment will be checked and serviced before reuse and strict hygiene standards adopted to ensure against the spread of infection and disease.
- 5.20 We store information regarding homes that have been adapted 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).
- 5.21 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 equipment where:
- a) the equipment requires it and
  - b) the tenant for whom the property was originally adapted is still living in the property
- 5.22 Some minor works adaptations are undertaken by Bucks County Council Occupational Therapy Service. We record all minor and major adaptations (contractor installations) on our housing management database.
- 5.23 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.
- 5.24 Approval must be granted before any works are undertaken on our homes including works carried out and funded by the tenant, except for minor adaptations carried out by Bucks County Council directly e.g., internal grab rails.
- 5.25 For significant works and adaptations such as bedroom extensions, we will advise the tenant 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 apply.

5.26 On completion of the adaptations work we will carry out a tenant satisfaction assessment to help us improve our tenant service performance.

## **6 Policy details**

- 6.1 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.
- 6.2 In considering funding for adaptations, we will also consider 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. We may work with the Local Authority in certain cases to help to deliver adaptation works.
- 6.3 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 consider 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.
- 6.4 There will be a value for money judgement made 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 and consider any innovative solutions such as mobile pods or temporary structures, which could replace traditional construction methods such as brick and block extensions.
- 6.5 If a property is offered through the lettings process described above but is refused by the tenant, the applicant 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
- 6.6 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 any works commence.
- 6.7 Where medical information in support of any adaptations is received further advice may be sought from an independent medical specialist before a decision is made to fund the requested works. At this point other options may also be considered.
- 6.8 Requests for upper limit requests will be approved by the Assistant Director of Technical.

## **7 Resources management**

- 7.1 An annual review will take place on the allocation of available budget.
- 7.2 All work will be undertaken by trained staff working for specialist contractors and any accidents, incidents and near misses reported to the Home Safety Specialist (Health & Safety) as quickly as possible after the event, to ensure that an investigation is undertaken.

## **8 Policy Statement**

- 8.1 The purpose of the policy is to set out our approach to the provision of adaptations and additional equipment in our homes and our intention to support the wellbeing and



independence of our tenants, either in continued occupancy of their own home or in another property that is suitably adapted or that can be adapted to meet their needs.

8.2 Our aim is to ensure consistency, clarity and fairness in our approach when dealing with requests for adaptations in our homes.

8.3 Adaptations will only be undertaken for the benefit of our tenants and/or family members living in the home/communal areas.

Adaptations will not be carried out where:

- A Right to Buy application has been made
- There is a Right to Acquire Application with a live status
- There is a short life leased property, or it is occupied on an assured short hold tenancy basis
- There is a severe tenancy breach
- If the tenant is in rented arrears
- 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
- Tenancy is temporary or the first year of a tenancy (starter tenancy)

## **9 References**

9.1 The key documents and references are listed in the legal framework section of this document.

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

## **10 Related Policies and Procedures**

10.1 Additional information relating to the management framework include:

- Older Persons Strategy
- Compliance Policies
- Repairs Policy
- HALP terms of reference
- Inclusion and Wellbeing Strategy
- Allocations Policy
- Tenancy Policy
- Mobility Scooters Policy
- Asset Management Strategy

## **11 Expected legislative/environmental changes**

11.1 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.

## **12 Publicising this Policy and Procedure**

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

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

## **13 Review**

13.1 This procedure 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 accordance with the document review date

## **14 Performance Indicators**

14.1 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
- tenant satisfaction
- quality and standard of completed works

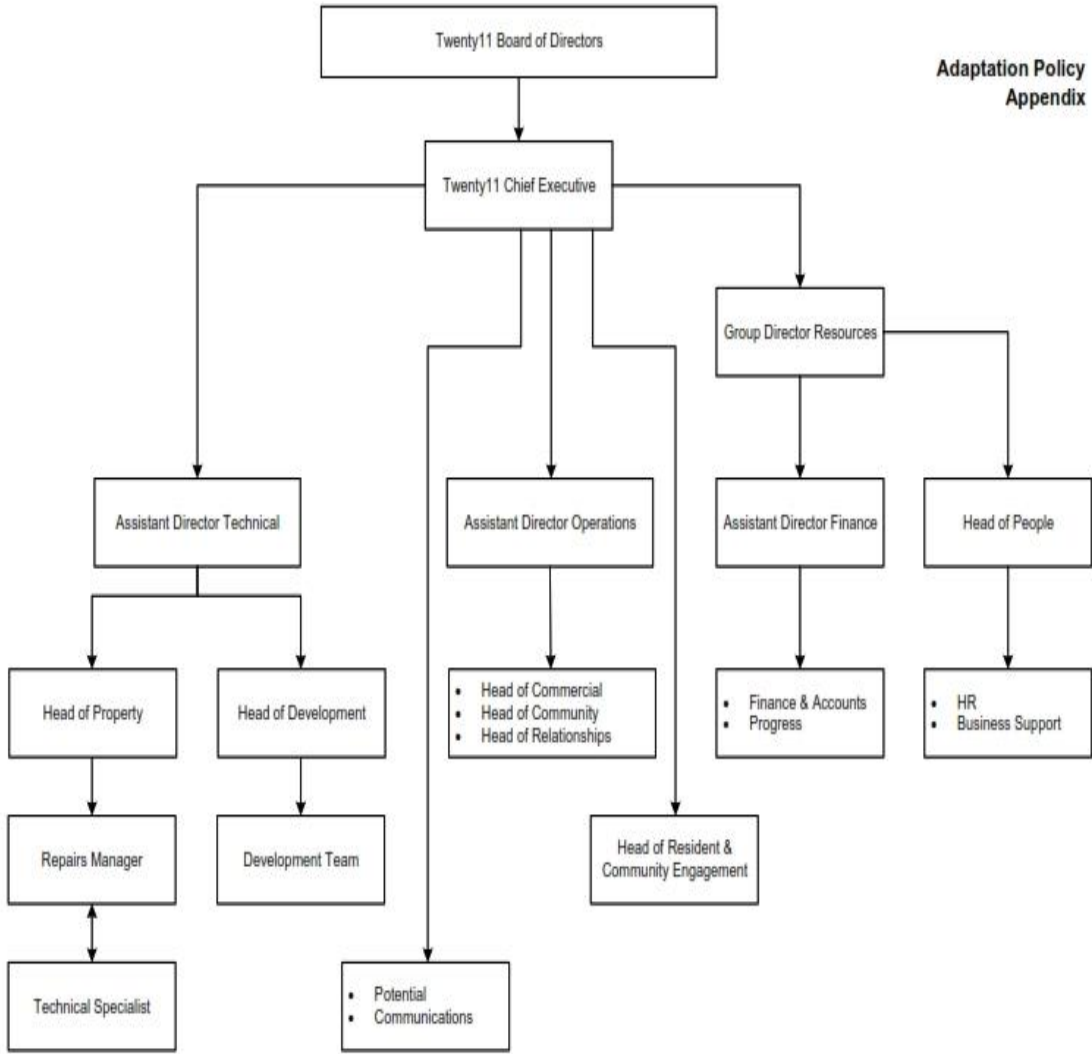
## **15 Appeals and Complaints**

15.1 If a tenant 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 tenant may request an appeal.

15.2 The appeal will be first heard by the HALP Panel then if this cannot be resolved, a formal complaint can be made to Red Kite, where it will go through formal complaints process.

## **16 Equality and Diversity**

16.1 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.



Staff roles listed in the **Competency Standards section** must be acquainted with contents of this document and have had documented instructions and training on its use. Authority to amend can only be undertaken by the **Process owner** with the relevant **Delegated approvals**.

For information on interpretations and instructions staff should contact the **Subject Matter expert** or **Process owner** and under no circumstances should any deviation be permitted without prior approval as above.

Document Controls			
<b>Version:</b>	6	<b>Effective date:</b>	December 2020
<b>Subject Matter expert drafter:</b>	Repairs Manager	<b>Process owner:</b>	Head of Property
<b>Related Pod</b>	Property	<b>Related Policy:</b>	Repairs Policy
<b>Review period</b>	3 Years	<b>Next review due by:</b>	December 2023
Delegated approvals			
<i>The 3 lines of defence have been checked within the framework and are valid</i>			<input checked="" type="checkbox"/>
<b>Approved by AD</b>	N/A	<b>Approved Date:</b>	N/A
<b>Approved by EMT</b>	Alan Keers 	<b>Approved Date:</b>	26th March 2021
<b>Approved by Board/Committee/RRT</b>	N/A	<b>Approved Date:</b>	N/A