



## Adaptations Policy

**Status: Approved**

<b>Policy Lead :</b>	Executive Director – Customer Experience
<b>Owned By :</b>	Repairs Lead
<b>Date Approved:</b>	February 2023
<b>Approved By :</b>	BHA Board
<b>Review Date:</b>	February 2026
<b>Regulatory / Legislative Considerations/ References</b>	<p>The policy should be considered as an essential document to BHA’s fulfilment of its duties under the Housing (Scotland) Act 2010 including provision of housing services in line with the Scottish Social Housing Charter and compliance with the standards set out in the Scottish Housing Regulator’s Regulatory Framework, inclusive of; The Scottish Housing Quality Standard / EESSH (Energy Efficiency Standard for Social Housing) and The Scottish Social Housing Charter.</p> <p>In addition, the policy fulfills legislative duties contained within:</p> <ul style="list-style-type: none"> <li>• Housing (Scotland) Act 1987</li> <li>• Housing (Scotland) Act 2001</li> <li>• Housing (Scotland) Act 2006</li> <li>• Housing (Scotland) Act 2010</li> <li>• Housing (Scotland) Act 2014</li> <li>• Disability Discrimination Act 2005</li> <li>• The Equality Act 2010</li> </ul>

	<ul style="list-style-type: none"><li>• The Environmental Health Protection Act 1990</li><li>• Property Factors (Scotland) Act 2004</li><li>• Tenements Scotland Act 2004</li><li>• Procurement Regulations</li><li>• Right To Repair</li></ul>
<b>Other Documents to be read in conjunction with this policy :</b>	<p>This document should be read in conjunction with:</p> <ul style="list-style-type: none"><li>• BHA's vision and values</li><li>• BHA's complaints policy</li><li>• Reactive Repairs Policy</li><li>• <u>Scottish Social Housing Charter</u></li><li>• <u>SHR Regulatory Framework</u></li><li>• <u>Housing (Scotland) Act 2010</u></li><li>• <u>UK General Data Protection Regulation</u></li></ul>

<b>Policy Title:</b>	<b>Adaptation Policy</b>
<b>Purpose / Aim of policy:</b>	Deliver an efficient, effective, prompt, and cost-effective adaptations service.
<b>Scope of Policy:</b>	Set out the guidance on how Berwickshire Housing will apply Adaptations Service.
<b>Definitions:</b>	What qualifies as an adaptation - Major, Very Major, Minor, Axillary Aid or Reasonable Adjustment.
<b>Specific detail related to each strand in the scope:</b>	<ul style="list-style-type: none"> <li>• Funding – how BHA will pay for adaptations</li> <li>• Eligibility –who may qualify for an adaptation.</li> <li>• Assessment and Referrals – how BHA will assess individual needs with regards to adaptations.</li> </ul>
<b>Approval Source:</b>	BHA Board
<b>Equality Impact Assessment:</b>	<p>As part of our overall provision of suitable housing to meet the needs of our applicants and customers, and to comply with our Equality &amp; Diversity policy, Berwickshire Housing Association (BHA) carries out adaptations to its stock.</p> <p>BHA is committed to tenancy sustainment by providing support to those tenants/prospective customers who require it, including those who require their home to be adapted to cope with age or disability.</p>
<b>Glossary of Terms</b>	<p>Care and Repair: Care and Repair services can help carry out repairs, improvements or adaptations in your home if you're older or disabled.</p> <p>HARP: Housing and Regeneration Programmes (Scottish Government)</p>
<b>Risk Implications:</b>	If BHA didn't adopt an Adaptation Policy our customers could potentially come to harm in their own home or be forced to move.

## 1. INTRODUCTION

- 1.1 BHA recognises that being able to access appropriate housing or to adapt a current tenancy can have a positive impact on health whilst contributing to independence, privacy and dignity.
- 1.2 The document makes reference to the supporting procedure that sets out how the policy will be implemented at an operational level, who has responsibility for each function and how the system will be administered.

## 2. POLICY AIMS AND OBJECTIVES

2.1 BHA key aims and objectives are to:

- Fully meet our legal obligations and meet the standards and outcomes as set out in The Scottish Social Housing Charter.
- Enhance the quality of life for our elderly customers and customers with a disability by contributing to housing Adaptations and maximising the availability of housing for people with diverse needs.
- Ensure Adaptations are carried out effectively and efficiently within a reasonable timescale.
- Ensure economy, efficiency, effectiveness, and equity in the delivery of the Adaptations service.
- Ensure effective joint working with the Care & Repair, the contractors and other relevant agencies in the delivery of the Adaptations service.
- Involve customers and their carers' in the decision making process regarding Adaptations and ensure their views are taken into account.
- Establish adequate funding arrangements with Care & Repair and HARP to ensure that Adaptations need is met.
- Maintain robust management information systems for monitoring and reporting performance in the Annual Return on the Charter which can be independently verified.

## 3. DEFINITIONS

3.1 Disability -The Equality Act 2010 defines disability as a physical or mental impairment that has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities. Therefore, the needs of, for example, a person with autism and/or the needs of family members living with someone who has autism should be considered in the same way as requests for support relating to a physical disability. However, those needs are only relevant to the extent that they will be met by physical changes to the property.

3.2 **Adaptations** to housing are permanent or temporary changes to a home considered to be essential:

- **Minor**- a change that does not affect the overall structure, is relatively inexpensive and may be installed or removed quickly and easily e.g., handrails, over bath showers, flashing doorbells.

- **Major**- structural or other permanent changes, such as wet floor bathrooms.
- **Very major**- as above but are highly specialised, high-cost adaptations e.g., an extension.

**3.3 Auxiliary aids and services/support** - can be similar to minor adaptations e.g., a lever tap, doorbell etc. It includes equipment such as signage and also covers services or changing practices as appropriate e.g., providing a sign language interpreter. We have an obligation to carry these out.

**3.4 Reasonable adjustment** - as a landlord where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, we have a duty to take reasonable steps to avoid that disadvantage. This can cover rules about the occupation or management of the property. This also links to 3.3 above.

- Where a physical feature (arising from the design/construction, or a fixture and fitting) puts disabled people at a substantial disadvantage compared with those who are not disabled, to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing auxiliary aids puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

## 4. FUNDING

### 4.1 General

Limited funding is available to the Association through the Scottish Government for essential adaptations meeting defined criteria. Annually the Association will make a bid for this funding from the Scottish Government to cover the expected levels of referrals. It is not guaranteed that the funding applied for will be obtained, for example applications for funding may be restricted by the Scottish Government.

In addition to this grant funding the Association may set aside additional funding for minor adaptations, meeting the same criteria, which may be used to augment the grant funding.

As funding each year is therefore limited it will be focused on the most urgent adaptations, in the case of less urgent works this may result in delays, or they may be deferred until funding becomes available, possibly into a future financial year when new funding is available.

### 4.2 Very Major

Limited funding is also available for very major adaptations, however in this case funding is approved on an individual case by case basis from a limited budget made available for these by the Scottish Government.

Where we receive a supported referral for a very major adaptation, we will first fully review the eligibility of the application for grant funding under the Scottish Government Guidance and also look at any other possible solutions to the issues concerned, including rehousing in more suitable accommodation.

In certain circumstances, adapting the property may not be considered to be the appropriate option. The criteria influencing these circumstances could be financial, technical or for reasons relating to the present or future use of the property. In these situations, alternative options such as re-housing will be discussed between the

Association, the Occupational Therapist and the Customer.

Where it is decided that the major adaptations are the most appropriate route a funding application will be made to allow this to proceed. Depending on available funding this may need to be deferred into a future year when funding is available.

## **5. ELIGIBILITY**

5.1 BHA appoint Borders Care & Repair to review adaptation referrals sent to us and decide if they are eligible to be taken forward. Adaptations that are not deemed essential cannot be funded and carried out by Borders Care & Repair. Adaptations are not deemed essential purely on the basis of the type of work being requested but on the specific illness or issues experienced by the individual concerned and on the level of benefit that the adaptation will have on these issues.

Where adaptations are not essential and so will not be done by us, customers may wish to self-fund or seek alternative funding means to allow the works to be done, with the work being organised by the customer or a third party on their behalf. In these cases, written permission for the adaptation is required and must be obtained from us as Landlords, prior to any work being carried out. It is strongly recommended in these circumstances that written permission is obtained at the earliest opportunity to avoid customers incurring unnecessary expenditure or abortive costs, should permission not be given.

In certain circumstances, we may consider that adapting the property is not the most appropriate option. The criteria influencing these circumstances could be financial, technical or for reasons relating to the present or future use of the property. In these situations, alternative options such as re-housing will be discussed between the Association, the Occupational Therapist and the Customer.

## **6. REFERRALS AND ASSESSMENT**

6.1 Scottish Borders Council does not allow BHA to make referrals for an Occupational Therapy (OT) Assessment. We can therefore only give advice to our customers on the process.

6.2 Customers and prospective customers must self-refer to the OT department of Social Work to be assessed for their adaptation needs. This can take many weeks.

6.3 Borders Care and Repair have their own OT, which can be requested by customers. However, again this may take many weeks.

6.4 For waiting list applicants with identified needs, the OT should assess, whenever possible, the prospective property with both the prospective customer and technical colleagues in attendance, prior to issuing a referral. This allows for advice on the suitability of the property for adaptation and speeds up the referral process.

6.5 Where a major adaptation i.e., high-cost work has been identified (see 4.2 above). BHA colleagues in conjunction with Occupational Therapy staff should assess housing options and alternatives available considering.

- the likely medical prognosis, and long-term usability of the proposed adaptation(s)
- the suitability of the property to meet the current and reasonably foreseen, future needs of the customer
- the customers desire to stay in their current home, and their safety
- the ongoing availability of the customers' existing support network
- the likely availability of suitable alternative accommodation from BHA, or other RSL
- the cost of the adaptations required
- technical or planning requirements which may make an adaptation not viable

## **7. PROGRAMME ARRANGEMENTS**

### **8.1 Planned Maintenance Programme**

8.1.1 The Planned Maintenance Programme to upgrade existing BHA stock will take the needs of disabled people into account. BHA has already enhanced its specifications for bathrooms to include over-bath showers, as this is one of the most commonly requested adaptations. However, as part of the planning process for investment, particularly in the provision of kitchens and bathrooms and electrical rewiring, colleagues will seek to establish whether there are people living in the household who require an Adaptation.

8.1.2 Where such households are identified, colleagues will take steps so that the improvements can meet the requirements of such households, using the Adaptations Budget where necessary to fund additional costs. Where high-cost Adaptations are required a holistic option appraisal should be carried out to ensure that the eventual solution not only meets the needs of the disabled person(s) but also delivers value for money for BHA.

### **8.2 New Build Programme**

8.2.1 Design standards will be contained in BHA's Design Brief and will comply with Building Regulations and current good practice guidance. BHA will ensure that all new build properties are built to Housing for Varying Needs standard. Where a specific need is identified to satisfy an identified customer, or having regard to the Local Housing Strategy, a number of new build properties will be built to fully wheelchair accessible standard.

8.2.2 Customers and applicants with particular housing needs (e.g., Medical A and Community Care cases) will have priority for new housing which will meet their needs. Where possible, properties will be pre-allocated to enable customers to participate in the design of their homes. Where there are particular needs, colleagues should request advice from the Occupational Therapists, and follow other relevant procedures detailed in this policy, so that the work will meet the needs of the household.

### **8.3 Reactive Adaptations**

8.3.1 BHA will apply for funding for medical adaptations annually in its Development Funding Plan submission to Scottish Government (as detailed in section 4 above) to meet the need for adaptations in core stock. The level of funding will be based on the following criteria: -

- Demand in previous years
- Trends in expressed needs (e.g., through customer annual visits or surveys)

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- Changes in BHA policy and working arrangements
- External influences, such as changes in government policy

8.3.2 Where reactive Adaptations are needed to building components awaiting upgrading under the investment programme (e.g., installation of over-bath showers) consideration should be given to the work being carried out and funded through the investment programme budget for that year.

### **8. COMPLAINTS**

If a customer is unhappy with any aspect of the reactive repairs service, a complaint can be made in accordance with our Complaints Policy in order to have their concerns investigated.

### **9. POLICY REVIEW**

The Association will review the Adaptation Policy every three years or following significant legislative or regulatory change.

Date next review is due – January 2026



