

Aids and Adaptation Policy

Originator:	Policy and Strategy Team
Approval Date:	January 2024
Review date:	January 2027

1	Introduction
1.1	One Vision Housing (OVH) is committed to promoting choice for independent living for its existing residents and applicants for housing that have a disability.
1.2	To achieve this aim OVH will take all reasonable measures to provide a fair and accessible aids and adaptations service, make best use of existing adapted properties and will work in close partnership with external agencies.
1.3	Scope of the Policy
1.3.1	OVH’s approach to the financing of aids and adaptations requests differs depending on the nature of the request (extent of works required) and the local authority area where the property is located.
1.3.2	The Policy provides detail of OVH’s provision of aids and adaptations services in the local authority area of Sefton covered by the terms and conditions of the Stock Transfer Agreement i.e. all properties that have remained as social housing from the point of transfer in 2006.
1.3.3	The Policy also details the arrangements that are in place where OVH is required to provide an aids and adaptations service for properties that are outside of the transfer agreement in Sefton and the arrangements that exist with other local authorities where OVH owns housing stock.
1.3.4	The Policy does not apply to OVH leaseholders, market rent properties, shared ownership properties or properties for outright sale but will apply to properties let under the rent-to-buy scheme.
1.4	Legal Compliance
1.4.1	The statutory responsibility for the funding of adaptations is the duty of the Local Authority. OVH residents are entitled to apply for Disabled Facilities Grant (DFG) through the Local Authority under the terms of the Housing Grants Construction and Regeneration Act 1996.
1.4.2	Operation of the Policy ensures OVH complies with the relevant legislation in regard to the provision of aids and adaptations services (following Occupational Therapists

recommendations). The main provisions of the legislation and that of the Equality Act 2010 are set out below:

1.4.3 The Equality Act 2010 defines who should be considered as disabled and requires OVH to take account of a persons' disabilities even if this means treating disabled people more favourably.

1.4.4 The Equality Act 2010 'Duty to make Reasonable Adjustments' applies to landlords and managers of rented premises or premises available to rent.

1.4.5 This duty is not anticipatory – it only arises if OVH are requested to make an adjustment by a person to whom the premises are let or who wishes to rent the premises, or someone on their behalf. Requests do not have to be made formally – it is OVH's duty to make a reasonable adjustment if it is reasonable to assume a request has been made.

1.4.6 There are two requirements under the Act:

- Providing auxiliary aids and services
- Changing provisions, criteria or practices (e.g. allowing a disabled person who uses an assistance dog to take a property that might otherwise have stipulated 'no dogs')

1.4.7 There is no legal requirement under the Equality Act 2010 for OVH to make any changes that would consist of or include the removal or alteration of a physical feature of the property which includes:

- Any feature arising from the design or construction of a building
- Any feature of any approach to exit from or access to a building
- Any fixtures or fittings in or on a premises
- Any other physical element or quality

1.4.8 The following do not count as physical features and so OVH will always make reasonable adjustments were requested to:

- Signs or notices
- Taps and door handles
- Replacement, provision or adaptation of doorbells or door entry systems

1.4.9 The test for deciding whether an adjustment is reasonable will be based on:

- How effective the change will be in assisting the tenant or household member who needs the adjustment
- Whether it can actually be done or not
- The availability of alternative suitably adapted properties
- The cost

1.4.10 Despite having no legal requirement to alter any physical features of its properties, OVH is committed to promoting choice for independent living for its existing residents and applicants who have a disability or require an aid or adaptation. OVH does this by allocating a budget for aids and adaptations annually, to assist local authorities to carry out their statutory duties.

<p>1.4.11</p> <p>1.5</p> <p>1.5.1</p> <p>1.6</p> <p>1.6.1</p> <p>1.6.2</p> <p>1.6.3</p> <p>1.7</p>	<p>The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England, responsibility of the Regulator for Social Housing (RSH) as outlined below:</p> <ul style="list-style-type: none"> Registered providers shall co-operate with relevant organisations to provide an adaptations service that meets tenants’ needs <p>Access and Communication</p> <p>OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.</p> <p>Equality, Diversity and Human Rights</p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, Pregnancy and Maternity, Marriage and Civil Partnership, Religion and / or Belief.</p> <p>OVH also recognises that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).</p> <p>The Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> OVH Repairs, Maintenance and Planned Works Policy OVH Complaints, Appeals and Feedback Policy
<p>2</p> <p>2.1</p> <p>2.2</p> <p>2.3</p> <p>2.4</p>	<p>Statement of Intent</p> <p>OVH will provide a fair and easily accessible aids and adaptations service to existing residents and applicants that promotes choice and encourages independent living and in most cases this service is free.</p> <p>OVH will ensure it meets its legal and regulatory requirements in regard to providing aids and adaptations services.</p> <p>OVH will endeavour to promote a co-ordinated partnership with other agencies in the provision of adapted properties.</p> <p>OVH will make decisions on major aids and adaptations that meets customers’ needs identified through Occupational Therapist reports and within budgetary constraints (Note – In</p>

	Sefton for properties covered by the Stock Transfer Agreement, this must be a report from the Local Authority's own Community Occupational Therapists).
2.5	OVH will make a distinction between 'minor' adaptations (those costing less than £1,000) and 'major adaptations' (those costing over £1,000) – (see sections 3.2 and 3.3 below for further details).
2.6	Residents will be able to self-refer for minor adaptations (subject to assessment by the OVH Aids and Adaptations Officer for adaptations costing £500 - £1000) whereas requests for major adaptations will require an Occupational Therapist report and recommendation. Any resident unsure of the extent of the required adaptation should contact OVH for advice in the first instance.
2.7	OVH does, however, reserve the right to seek an Occupational Therapist's report on aids and adaptations requests below £1000 in value on a discretionary basis, to ensure the proposed works meet the customer's individual needs in the most effective way.
2.8	Aids and Adaptations Services in Sefton
2.8.1	OVH will provide an annual budget identified within the OVH Business Plan and the commitments set out in the Transfer Agreement with Sefton MBC, which will be used as efficiently as possible to provide a fair and accessible service to all existing customers and applicants requiring adapted properties, in the Sefton area.
2.8.2	OVH will endeavour to finance requests for major adaptations (i.e. those costing over £1,000) from its own resources up to a limit of £10,000 per property and subject to the availability of annual budget allocations.
2.8.3	Where adaptations are required that go over the £10,000 cap per property, OVH will work with individuals and Sefton Council to access Disabled Facilities Grant (DFG) up to an upper limit of £30,000 per property and subject to the availability of Sefton MBC annual budget allocations.
2.8.4	In exceptional circumstances, OVH may consider requests for top up funding where an adaptation is likely to cost more than the £30,000 upper limit identified in the DFG regime. In these circumstances alternative options for financing will be discussed including the tenant or applicant's own means of financing the adaptations required.
2.8.5	If and when the annual budget allocation is exceeded, OVH will inform Sefton MBC and will not make a financial contribution to any further major adaptation requests from its tenants in Sefton (legacy transfer stock only), in the financial year, regardless of the cost.
2.9	Aids and Adaptations Services in Other Local Authority Areas
2.9.1	Where major adaptations requests, that are approved, are received from the tenants of social housing owned by OVH in other local authority areas (and non-legacy stock in the Sefton area), OVH's contribution to the cost of carrying the works will be limited by budget availability and determined by negotiation on a case, by case basis.

3	Policy
3.1	Eligibility
3.1.1	OVH will endeavour to provide aids and adaptations services to occupants of social housing it owns and manages who have a disability, including children who are permanent members of that household (subject to budgetary constraints and suitability of requests).
3.2	Minor Adaptations
3.2.1	OVH will not unreasonably refuse a request for a minor adaptation or auxiliary aid, (see minor adaptations appendix). All minor adaptations requests that cost between £500 and £1000 will be assessed by the Aids and Adaptation Officer, (trained to Trusted Assessor Level 3) for their suitability to the customers, within 10 working days.
3.2.2	Minor adaptations are defined as non-structural alterations or additions to a home, for example - grab rails. Other examples of minor adaptations are available at Appendix A . OVH will not, however, provide non-fixed equipment to assist with a disability or mobility problem that are normally supplied by Social Services and Re-enablement Teams.
3.2.3	In carrying out minor adaptations, OVH will in most cases follow the guidance - ‘Minor adaptations without delay – A practical guide and technical specifications for housing associations’ 2006 produced by the College of Occupational Therapists.
3.2.4	Subject to an assessment as per 3.2.1, the request will be raised as a standard repair job as long as they do not exceed £1,000 in total value in any one property. OVH will inform the customer of the likely timeframe for completing the work when it is ordered.
3.2.5	OVH reserves the right to levy annual service charges for any minor adaptation that have an ongoing maintenance liability.
3.3	Major Adaptations
3.3.1	<p>Approvals for major adaptations will be made following a meeting of the Aids and Adaptations Panel consisting of the Aids and Adaptations Officer, Assistant Project Manager - Asset Management Team, a Neighbourhood Services Team Leader and Independent Living Team Leader where:</p> <ul style="list-style-type: none"> • OVH is in receipt of an Occupational Therapist’s assessment and clear recommendation that the work is necessary to sustain independent living, addressing basic needs only (with critical needs assessments receiving the greatest priority) • Aids and Adaptations Officer assessment of the property is carried out • The proposed works meet all planning and building regulation requirements • Note – (where alterations to bedroom size or additional bedrooms are required as part of the adaptation, this will also require approval from the Operations Director – Assets and Compliance)
3.3.2	Major adaptations are defined as involving structural alteration or which typically cost more than £1,000. Each request for major adaptations will be considered on its merits. Examples of major adaptations can be found at Appendix B .

3.3.3	When evaluating a request for an adaptation, OVH will consider individual, financial, technical and other relevant factors to enable a balanced decision to be taken to ensure best use is made of the available financial resources.
3.3.4	Wherever possible and suitable for a customer's circumstances, OVH will endeavour to facilitate approved requests for major adaptations through allocations or management moves to pre-adapted properties that meet required needs.
3.3.5	OVH will only consider approving major adaptations in non-adapted properties when moving or allocating to a pre-adapted property is unsuitable for the customer or unlikely to meet critical needs (as identified by Occupational Therapist reports) within reasonable timescales.
3.3.6	<p>OVH will consider the following criteria when prioritising permissions and providing funding for major adaptations works:</p> <ul style="list-style-type: none"> • The basis of an Occupational Therapists assessment (with 'critical needs' receiving priority over those with 'substantial needs') • Where there is more than one applicant with the same Occupational Therapist recommendation, priority will be given on date order (i.e. those that have been waiting longest) • Additional priority may be given where the requirement for adaptation is causing a current health and safety or fire risk • The decision will be subject of review by the specially convened OVH Panel (see 3.3.1 above)
3.3.7	<p>OVH reserve the right to refuse the request for a major adaptation on the following grounds:</p> <ul style="list-style-type: none"> • Where the adaptation is requested in a property that is due for demolition or major refurbishment within two years • The property is unsuitable for the resident e.g. too large or too small for their household (statutorily overcrowded). In the case of under-occupation, OVH may on a discretionary basis waive this condition where no other suitable housing is available (subject to affordability checks and all care needs being met) • Where the request is for a person that does not live at the property for the majority of the time i.e. it is not their sole and principle home • The property is unsuitable for adaptation • Where the request is for the communal parts of buildings • The request is for storage facilities or charge points for scooters or other electric mobility aids • The request is for a wet room or level access shower above the ground floor level of a property (unless as part of a like-for-like replacement programme and after an internal assessment that the need for the facility still exists. OVH will also exercise discretion on a case-by-case basis depending on the physical attributes of the property) • The request is for a through floor lift (see Section 3.4 for details of lifts) • A suitable, alternative or already adapted property is offered and refused (depending on individual circumstances and subject to review by the specially convened OVH panel as outlined in 3.3.1 above)

	<ul style="list-style-type: none"> • The adaptation requested is unlikely to meet the needs of a progressive condition or on-going health needs
3.3.8	Any requests for major adaptations in high rise stock or any other property above ground level will be considered on a case-by-case basis. In exceptional circumstances, OVH may waive the above grounds for refusal with decisions taken by OVH's Aids and Adaptations Panel (see 3.3.1. for details).
3.3.9	Where applicants are in rent arrears of 4 weeks or more, OVH may refuse to provide aids and adaptations services, unless there is a repayment plan in place and there is evidence that it's being adhered to. OVH may on a discretionary basis waive this condition in cases of critical need or where there are immediate risks to health and safety to the occupants of the property.
3.3.10	OVH reserves the right to levy an annual service charge for any major adaptation that has an ongoing maintenance liability.
3.3.11	Where major adaptations require replacing i.e. they have reached the end of the operational life, OVH will reassess the needs of the customer and may require a new Occupational Therapists report.
3.3.12	At this stage, OVH will discuss with customers options to meet their needs, including moving to alternative and suitability adapted properties, if available and appropriate.
3.3.13	OVH will inspect all major adaptations on completion to ensure that the work has been undertaken professionally and to check that the resident is satisfied with the work.
3.4	Through-Floor Lifts
3.4.1	OVH have taken a business decision that it will not install any 'new' through-floor lifts in any of its properties due to the cost implications, on-going maintenance issues and difficulties it creates for future lettings.
3.4.2	Where there are existing properties with through-floor lifts, OVH will continue to carry out maintenance and periodic checking to ensure they remain safe and operational.
3.4.3	Where existing through-floor lifts have reached the end of their operational life i.e. it is no longer possible to service them or find replacement parts, OVH will carry out an assessment with the tenant(s) to determine if the lift is still required or their needs could be met in other ways through different adaptations, or a management move to an alternative property. This, at OVH's discretion, may involve a new assessment by an Occupational Therapist.
3.4.4	Only in exceptional circumstances will OVH consider replacing existing through-floor lifts when all other alternatives have been explored (e.g. re-housing) and are deemed to be unsuitable for the individual(s) concerned.
3.4.5	Each case will be reviewed on its merits and a decision will be taken by members of the Aids and Adaptations Panel (see 3.3.1) and will be subject to the availability of OVH funds and successful applications for DFG for part payment, where this may apply.

3.5 **Tenants and applicants requiring a move to an adapted property**

3.5.1 The majority of OVH properties, adapted and non-adapted are advertised and let through the pan-Merseyside Choice Based Lettings (CBL) system and Policy. This system awards priority to those applicants requiring a move to a previously adapted property.

3.5.2 In general, OVH will bypass an applicant who bids for a property that does not meet their specific health needs.

3.6 **Appeals and Complaints**

3.6.1 Where OVH refuse permission for an aid or adaptation, customers may request a review of the decision within 12 months of being notified or if they are unhappy with the way they have been treated by OVH during the course of aids and adaptations applications, they can seek redress via the OVH Complaints, Appeals and Feedback Policy.

3.7 **Right to Buy and Succession**

3.7.1 OVH reserve the right to refuse an application for Preserved Right to Buy or Right to Acquire from tenants living in a retirement housing scheme or other properties that may be suitable for elderly or disabled persons (regardless of any adaptations that may have been installed).

3.7.2 OVH will not process any new requests for aids and adaptations where a current application for Right to Buy or Right to Acquire is active.

3.7.3 If applications for Preserved Right to Buy or Right to Acquire are received from general needs accommodation, that has had major adaptations, OVH will either:

- Make reasonable offers of alternative accommodation for purchase if the adaptation is no longer required and re-let the adapted property (matching incoming tenant(s) needs to the existing adaptations)
- Where the adaptations are required by the tenant seeking to purchase, OVH will ensure the cost of the improvements will be reflected in the property valuation

3.7.4 In all circumstances where Preserved Right to Buy or Right to Acquire applications are received, OVH will advise tenants of the procedures OVH will follow and make them aware of any additional costs they may incur.

3.7.5 Where a Right of Succession applies and the property has adaptations or is otherwise unsuitable for the person wanting to succeed to the tenancy (subject to eligibility criteria being met), OVH will seek to make reasonable offers of alternative accommodation.

3.7.6 If there is failure to reach agreement on alternative accommodation OVH may seek to gain possession of the property using grounds 7 or 9 of the Housing Act 1988 but each case will be reviewed on its merits.

<p>3.8</p> <p>3.8.1</p> <p>3.8.2</p>	<p>Reinstatement of existing adapted homes that become void</p> <p>Where properties that have had major adaptations become void, OVH will generally advertise the property as being adapted and those applicants with needs that match the adaptations would be given priority (and normal Choice Based Lettings Criteria would apply).</p> <p>OVH does, however, reserve the right to remove the adaptation(s) if this is viewed as the best use of its resources to meet local housing need, or to directly match this property to a household requiring specific adaptations.</p>
<p>4</p>	<p>Implementation</p>
<p>4.1</p> <p>4.2</p> <p>4.3</p> <p>4.4</p> <p>4.5</p>	<p>All OVH staff have a responsibility to be aware of the OVH Aids and Adaptations Policy and to signpost any customer queries that may arise.</p> <p>All minor adaptations over the value of £500 will be assessed by the Aids and Adaptations Officer.</p> <p>Decisions on major adaptations will be made by the specially convened panel made up of the Aids and Adaptations Officer, Assistant Project Manager – Asset Management Team, the Neighbourhood Management and Independent Living Team Leader, as appropriate (on the recommendations of Occupational Therapists reports and subject to budget / resource availability).</p> <p>Monthly contract monitoring meetings will be held with the Aids and Adaptations Officer, OVH Asset Management Team and Contractors involved in installations works.</p> <p>The Head of Independent Living will have operational responsibility for the aids and adaptations service and for revisions to the Policy for OVH Executive Management Team approval.</p>
<p>5</p>	<p>Performance</p>
<p>5.1</p>	<p>Performance will be rated by the following Performance Indicators:</p> <ul style="list-style-type: none"> • Customer Satisfaction with Major Aids and Adaptations • Monitor critical / substantial works completed within time frames • Provide an annual finance breakdown for properties included in the Sefton Stock Transfer Agreement
<p>6</p>	<p>Consultation</p>
<p>6.1</p>	<p>All staff and the Tenant Policy Review Group have been consulted in the development of this Policy.</p>

7				Review			
7.1				This Policy will be reviewed every three years (from the date it is approved) by the Executive Management Team (EMT) to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the obligations of OVH or changes to OVH business practices.			
8				Equality Impact Assessment			
8.1				Was a full Equality Impact Assessment (EIA) required?		No	
8.2				When was EIA conducted and by who?		An EIA Relevance Test was undertaken by the Policy and Strategy Manager and the Head of Independent Living in May 2023.	
8.3				Results of EIA		The Relevance Test identified that the service is more likely to be required by customers who have a disability or who are aged and have mobility problems. Whilst there is a differential impact for these groups the effect is not adverse as the Policy and procedures aim to provide support to enable independence. The main recommendation is for OVH to monitor the characteristics of customers where there is a refusal to offer a service (normally on panel decision or appeal) to ensure there are no hidden barriers to access and to review the Policy / procedures if any trends are identified.	
9				Scheme of Delegation			
9.1				Responsible committee for approving and monitoring implementation of the policy and any amendments to it		Executive Management Team	
9.2				Responsible officer for formulating policy and reporting to committee on its effective implementation		Director – Housing and Customer Services	
9.3				Responsible officer for formulating, reviewing and monitoring implementation of procedures		Director – Housing and Customer Services	
10				Amendment Log			
Date of revision:		Reason for revision:		Consultation record:		Record of amendments:	
2 nd July 2019		In line with changes in OVH's business practices		See section 6		<ul style="list-style-type: none"> Addition of new section detailing 	

			<p>provisions for through-floor lifts</p> <ul style="list-style-type: none"> • Inclusion of rent-to-buy properties in Policy scope
21 st Dec. 2021	In line with review schedule	See Section 6	<ul style="list-style-type: none"> • Revised wording in introduction to clarify position on scope • Updated EIA included at Section 8
9 th January 2024	In line with review schedule	See Section 6	<ul style="list-style-type: none"> • Revised wording at 2.4 to include arrangements specific to the Sefton area • Revised wording at 2.9.1 to reflect funding arrangements outside of Sefton and for non-Stock Transfer properties • Change at 3.2.1. to reflect level of qualification of Aids and Adaptations Officer • Changes at 3.3.7 to reflect current operational practice • Policy updated throughout to reflect new wording in the revised Property Pool Plus Policy • EIA Relevance Test updated at Section 8 • In line with Board approved process the review period has been extended for this Policy from every two years to every three years

Appendix A – Examples of Minor Works

Grab rails

Mop stick handrails

Plinth for WC

Lever taps

Steps

Door entry systems

Key safes

Silent bells

Visual smoke alarms

Appendix B – Examples of Major Works

Over bath and level access showers

Wet rooms

Modular ramps

Stair lifts

Extensive door widening