



Adaptations Policy

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1. SCOPE/PURPOSE

This policy governs how Adra (Tai) Cyf manages requests for aids, adaptations and reasonable adjustments to our homes.

Adra aims to ensure that all of our contract-holders are able to live independently in their homes for as long as possible. To this end, we will provide an adaptations' service and will work in partnership with other organisations, where possible, to help meet the needs of our contract-holders and make the best use of our assets.

This policy supports staff to make decisions that are fair, practical, reasonable and within available resources.

This policy applies to all Adra's current or prospective contract-holders, and other qualifying persons and accommodation that is, or is intended to be, a disabled person's only or main residence.

2. POLICY DETAIL

Adra recognises that adaptations have a crucial role to play in supporting disabled and older people to live safely and independently, improving the health and wellbeing of the individual, their families, carers and reducing pressures on frontline services such as health and social care.

Our Adaptations Service will ensure the co-production of solutions with our contract-holders and in partnership with social services, health, housing departments and other relevant partners to achieve the best outcomes with the optimum use of our resources.

2.1 Small Adaptations / Auxiliary Aids – All Properties

Adra has a duty under the Equality Act 2010 to make reasonable adjustments and to provide auxiliary aids (small adaptations) for those who suffer with a disability. This applies to all of Adra's contract-holders, regardless of whether the dwelling is an LSVT Property or Non-LSVT Property. Reasonable adjustments do not include structural alterations, but Adra may complete structural work in appropriate cases provided that the funding is available.

Adra will work with the contract-holders, Social Services, Betsi Health Board, and other appropriate partners to provide small adaptations/auxiliary aids and reasonable adjustments that may assist them.

2.2 Medium and Large Adaptations/Significant Property Alterations

Adra has a contractual duty pursuant to the terms of the LSVT Agreement to spend the Adaptations Transfer Sum on LSVT Properties.

LSVT Properties are therefore eligible for medium and large adaptations, subject to the same being assessed as necessary and appropriate, reasonable and practicable and the works can be met within existing budget and provides value for money.

If the adaptations budget for LSVT Properties is likely to be fully utilised, Adra reserves the right to defer the adaptation application until the following or future financial years. We will seek alternative funding sources but if this is not possible we may need to refuse the request if it cannot be delivered within resources available and what would be considered a reasonable timescale. In this case, the relevant Occupational Therapist will be informed of the decision and all alternative options to provide improved and suitable housing will then be considered.

Adra is not under a contractual duty to complete any medium/large adaptations/ significant property alterations to its Non LSVT Properties, however it may use its discretion to complete such works where reasonable and budget allows for the same.

Any cases where medium or large adaptation/significant property alterations may be initially assessed as suitable must be referred to the Adaptations Panel who will consider each case holistically.

If an adaptation is refused or deferred on cost ground, contract-holders may exercise their lawful right to apply directly to their Local Authority for a Disabled Facilities Grant (DFG) but such applications will have to be instigated by the contract-holders themselves and not by Adra. Adra may offer assistance with preparing the DFG application. In such cases contract-holders will need to submit a request for permission to carry out Alterations and Improvements according to Adra's L&Fpol03 - Contract Holders Improvements and Alterations policy.

2.3 Exceptional Circumstances

In exceptional circumstances and where available capital budgets are identified e.g in a year where there is likely to be an underspend or available external grant funding, major structural work / significant property alterations such as extensions to existing dwellings may be provided. There is no statutory duty or otherwise for Adra to carry out this work. However, we recognise the importance this being an option to support our contract-holders where possible.

2.4 Unmet Need

It should be recognised that it may not be possible to meet the needs in all circumstances. This is known as unmet need and despite all reasonable efforts from all partners the demand for suitable properties is likely to exceed the availability for suitable properties. It is expected for the wellbeing of all staff, that all partners respect this fact and remain professional and calm in the face of such pressures.

3. PROCEDURES

3.1 Adra Adaptations Panel

Any case where a medium or large adaptation/significant property alteration may be suitable must be referred to the Adaptations Panel who will consider each case holistically. A nominated person from the relevant OT Services may be invited to participate in the panel meeting.

The Adaptations Panel will not approve a request for medium or large adaptations unless it is satisfied:

- That the relevant works are **necessary and appropriate** to meet the assessed needs of the disabled occupant, and
- That it is **reasonable and practicable** to carry out the relevant works having regard to the property circumstances, and
- That the relevant works can be met with existing resources and provide **value for money** for Adra or any other relevant funding stream.

The panel will take into consideration the professional judgement and assessment of the OT, and the practical advice of housing specialists who can advise and guide towards the most practical and cost effective solution. The panel may invite other experts as required to provide advice in particularly complex or unusual cases.

3.2 Adra Adaptations Panel Decision Making -

Each application will be considered on its own merits. In considering what would meet the assessed needs of a disabled occupant, the Adaptations Panel will include consideration of options to meet that need. These will include identifying the relevant works considered necessary to meet the assessed need, use of portable equipment to meet the assessed need, and giving consideration to whether or not it is reasonable to suggest a move to more suitable alternative accommodation through a transfer within Adra stock, via the Common Housing Allocations Register in each local authority area and/or Specialist Housing Panel route.

The panel will use the Adaptations Panel Checklist with the aim of approving adaptations in a consistent way whilst also taking account of Adra's legal and contractual responsibilities as well as individual circumstances/needs.

3.3 Authority Limit

If the request is in respect of more significant property alterations/major structural works or exceeds a cost of £10,000, the decision must be authorised by the Deputy Director of Property (or equivalent). If the Adaptations Budget has been fully utilised or is likely to be fully utilised within year, Adra reserve the right to defer the application until the next financial year or refuse the application on financial grounds.

3.4 More Suitable Alternative Accommodation

When considering whether or not it is reasonable to suggest a move to more suitable alternative accommodation the Adra Adaptations Panel will give regard to the contract-holders' circumstances and property turnover rates to evaluate the likelihood that such accommodation will become available within a reasonable timescale.

Where the panel considers that a move to more suitable alternative accommodation is reasonable, with the contract holders permission, Adra will record the case on its **Transfer**

Register in order to match the contract-holders with suitable properties that become vacant. Adra may also work with the contract-holders to submit a suitable transfer request to the relevant local authority housing register.

If appropriate, Adra will provide the disabled occupant with small adaptations and/or recommend portable equipment to reduce the risk of injury to themselves or their carers whilst waiting for more suitable alternative accommodation to become available.

Adra will work in partnership as appropriate to assist contract-holders to find and move to more suitable alternative accommodation.

The Adra Adaptations Panel will review the applications for adaptations that are waiting for suitable alternative accommodation within 12 months of the panel's original decision taking into account the turnover of properties during that period.

When a potential property is identified, the customer will be offered a joint visit with Adra's Occupational Therapist and Adaptations Officer to ensure its suitability and agree which adaptations (if any) will be carried out before a formal offer of tenancy, or transfer of tenancy, is made. If the customer then accepts the property the agreed adaptations, where they remain reasonable and practical, will be undertaken.

If appropriate, a range of options will be offered to contract-holders to assist them to move. Such options will be in accordance with Adra's ALLpol02 – Under Occupancy Policy.

Adra will close applications for adaptations where a contract-holder refuses a reasonable offer of alternative accommodation.

3.6 Specialist Housing Panel Route

Adra staff will fully participate in the relevant local authority Specialist Housing Panel, taking a solutions-focussed approach to support all partners to achieve positive outcomes for contract-holders or prospective contract-holders.

In any cases when the Adaptations Panel or the Deputy Director of Property has identified that it is not appropriate and feasible to provide an adaptation to the contract holder's present home and is therefore recommending and supporting a property move, Adra's Adaptations Panel may refer the case to be considered by the Local Authority **Specialist Housing Panel**. These cases will tend to have complex needs and due to the required facilities or changes to the existing property would need significant property alterations or a new build home. This referral will be done with the contract-holders' permission.

The Specialist Housing Panel can use the **Local Authority Adapted Housing Register** to identify and determine if it is probable that a suitable transfer offer can be looked at. The Occupational Therapist supporting the move and in the case of Adra properties the Adaptations Coordinator can assess a property and decide to proceed by offering the contract-holder a visit to view the property. The offer of the move can include looking at providing some further adaptations to the

offered property to meet the identified adaptation needs. Further adaptations to the property are subject to approval by Adra, if the adaptations are considered to be reasonable and practical and dependant on the availability of resources.

In circumstances where it's unlikely that suitable alternative accommodation can be identified, or the property does not exist in the present housing stock the **Specialist Housing Panel** can consider the possibility of including a specialist adapted housing unit in a new development that is at an early design stage. The agreement of including a specialist adapted housing unit in a new development is subject to the Social Housing Provider assessment that it feasible to include the specialist unit in the new development at an early design stage.

3.7 Large Adaptations that are for Significant Property Adaptations / New Build adaptations on New Build sites.

When a large adaptations request involves a significant property adaptation such as an extension or adaptations to a property **on a new build construction site** the request will be shared with the Specialist Housing Panel Teams Channel for consideration at the next Specialist Housing Panel. This will ensure the best possible solution is achieved for the customer and that consideration is given to the availability of budgets to complete the works.

3.8 Adaptations as Improvements (self funding)

Requests may be made by contract-holders who wish to self-fund adaptations either because the proposed adaptation does not meet the criteria laid out in this policy or for other reasons. Such requests must be made in accordance with Adra's L&Fpol03 – Contract Holders' Improvement and Alterations policy.

3.9 Adaptations and Empty Homes

Properties with medium or large adaptations that become empty will be matched to contract-holders on Adra's Transfer List for those awaiting more suitable alternative accommodation. If there is no match, a request will be made to the relevant housing register for a list of applicants whose needs can be met in the adapted property.

If no suitable contract-holders can be found the property will be referred to the Adaptations Panel who will decide whether or not it is suitable to be retained as strategic adapted stock or returned to general let as it is. The Panel may decide to raise awareness of the empty property with relevant professional colleagues.

3.10 Transfer and Mutual Exchange requests from contract-holders in adapted properties

Transfers - Following a medium or large adaptation, Adra would normally expect the contract-holders to remain in the property for several years. Accordingly transfer requests from an adapted property will in most cases be refused unless there are exceptions where the contract-holders' needs have changed. In such cases the application for transfer will be considered by the Adra Adaptations Panel. The transfer application should highlight any adaptations required in the new property, and how the proposed transfer addresses the hardship being experienced and benefits the contract-holders requiring the adaptation.

Exchanges - Adra will not normally refuse an application for exchange, but consent would be refused where a property has special features, for example extensive adaptations, and the new contract-holders (assignee) does not need those features.

3.11 Service Charges and Adaptations

Adra will only arrange to service and repair specialist equipment that is in our ownership and fixed within the home. This is to meet relevant regulations and standards. Other installations and portable equipment is not Adra's responsibility to maintain. A Service Charge will be raised to cover the cost of servicing and maintaining all specialist equipment installed.

Adra will consult with and advise the contract-holders of the potential cost of maintaining specialist equipment including whether or not the costs may be eligible for Welfare Benefits.

If specialist equipment which incurs a Service Charge is removed, the service charge will no longer be applicable.

3.12 Removal of Adaptations

Where the recipient of the adaptation no longer resides at the property, the remaining occupants or contract-holders may be asked to consider a move to another property so that another disabled contract-holders can benefit from that adaptation. Adra will support any such contract-holders who are required to move in accordance with options outlined in Adra's ALLpol02 – Under Occupancy Policy and NSpol06 Transfer of Contract Policy.

Where small, medium or large adaptations have been carried out to a property these will not normally be removed e.g. where a bath has been replaced with a level access shower. Adra may ask the prospective contract-holders to sign a disclaimer that they accept the property with the adaptation. Adra may also refuse to grant permission for the new contract-holders to remove the adaptation at their own expense.

3.13 Hospital Discharge

Adra will consider referrals from hospital and social services Occupational Therapists and, where reasonable and practicable, may install auxiliary aids, adaptations and make reasonable adjustments to facilitate the early discharge of individuals from hospital. Adra's Adaptations

Panel would subsequently consider any assessment for more substantial work in accordance with this policy.

Adra will work in partnership to enable a transfer to more suitable accommodation where a person is unable to return to their main residence.

4. RESPONSIBILITY AND ARRANGEMENTS

Role	Responsibility
Deputy Director of Property and Director of Customers and Communities	Ensure this policy is applied effectively by Adra and that staff are trained appropriately in the procedures associated with this policy
Adra's Adaptations Panel	It is the responsibility of Adra' Adaptations Panel to use this policy to guide decision making and prioritisation.
Specialist Housing Panel	It will be the responsibility of the relevant local authority 'Specialist Housing Panel / Partners to consider needs that cannot be met by the Adra Adaptations Panel. The availability of suitable homes and available funding are likely to be limiting factors but all parties are committed to working in partnership to find appropriate solutions.

5.0 DEFINITIONS

For the purposes of this policy the definition of an adaptation is an alteration or addition to any aspect of a dwelling to make it easier or safer for use by a disabled person.

A **disability** is defined under the Equality Act 2010 as a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities. In order to be long-term it is generally accepted that the adverse effect will last, or likely to last, for more than 12 months.

For the purposes of this policy the definition of an **adaptation** is an alteration or addition to any aspect of a dwelling to make it easier or safer for use by a disabled person.

Small adaptations are defined as adaptations which will cost less than £1,000 to complete and will, typically, be much less. Minor adaptations are sometimes referred to as auxiliary aids. They include rails, small ramps, steps, door entry systems, lever taps, external lights and additional

electric sockets, but not portable items of equipment. They can be requested by Adra staff, or other appropriately trained partners, by completing a simple referral form.

Medium adaptations are defined as either a single adaptation which will cost more than £1,000 or a package of adaptations, where although individual costs may be less than £1,000 the overall cost exceeds this amount.

Large adaptations - Where the value of adaptations that reaches over £8000 (individual adaptations / structural alterations or combination of adaptations.) These will be regarded as a large adaptation. We will refer to these as significant property alterations where the request is in well in excess of £10,000

DFG means the Disabled Facilities Grant . This is a means tested grant provided by Local Authorities to cover the cost of providing adaptations and access to essential facilities that enable a disabled person to continue living at their property. The local authority must be satisfied that the adaptation is “necessary and appropriate” to meet the person’s needs and that the works are reasonable and practical. It is the contract-holder’s responsibility to submit the request for a DFG grant.

Adaptations Transfer Sum - In April 2010 Cyngor Gwynedd transferred all of its housing stock to Adra (or Cartrefi Cymunedol Gwynedd Cyf (CCG) as was its name at that time); this is known as a Large Scale Voluntary Transfer (LSVT). As part of the LSVT Agreement Adra agreed to spend a certain amount annually on completing adaptations work on LSVT Property for a term of 30 years.

LSVT Agreement means the large scale voluntary transfer agreement between Cyngor Gwynedd and Adra (previously known as Cartrefi Cymunedol Gwynedd) transferring ownership of its homes to Adra

LSVT Property for the purposes of this policy includes any properties that was included in the LSVT Agreement.

Non-LSVT Property for the purposes of this policy shall mean any property acquired or developed by Adra since April 2010.

An Occupational Therapist (OT) – registered Allied Health Professional who is trained to assess how health issues (physical and mental) affect Clients' functional ability to complete activities of daily living. Adra employs its own Occupational Therapist mainly to assist with assessments related to Adra’s Improvement and Development Programmes, facilitate disabled contract-holders moving to more suitable alternative accommodation, and to assist in the timely and appropriate re-letting of our empty homes. Adra also works closely with Occupational Therapists who are employed by Local Authorities and Local Health Boards.

Adaptations Co-ordinator manages adaptations works and works closely with the OTs, housing officers and contract-holders to agree the most appropriate design solutions, and prepare and administer the adaptations to completion.

The Adaptations Panel will consist of Occupational Therapists, Adaptations Officer, Housing Lettings Officer, Neighbourhood Officers, and relevant subject experts as appropriate to the cases being considered.

The Specialist Housing Panel is hosted by the Local Authority and consists of relevant partners determined by the Local Authority.

Common Housing Allocations Register or Local Authority Adapted Housing Register these are waiting lists held by the Local Authority to record individual housing needs. Sometimes the information is held in a single register.

Transfer Register – Waiting list held by Adra for contract-holders who need to move to another Adra property through a managed move.

6.0 ASSOCIATED DOCUMENTS AND REFERENCES

It is important that records relating to adaptations are stored securely. Electronic records will be saved in our core business system, and on secured network drives. When personal data is emailed between organisations those emails will be encrypted, or the files will be password protected.

WHQS 2023 standard

Home Adaptations Consortium 'Home Adaptations for Disabled People A Detailed Guide to Related Legislation, Guidance and Good Practice'

The Royal College of Occupational Therapists 'Minor Adaptations Without Delay'

Renting Homes (Wales) Act 2016

Housing Grants Construction and Regeneration Act 1996

Equalities Act 2010

Social Service and Wellbeing Act (Wales) 2014

Social Services and Well-being (Wales) Act 2014 and its interface with Disabled Facilities Grant – Practical Guidance v1.2

L&Fpol03 Improvements and Alterations policy

CCpol01 – Complaints and Concerns Policy

TSpol05 – Succession of Tenancy Policy

NSpol06 Transfer of Contracts Policy

Occupation Contracts

7.0 RECORDS OF REVISIONS TO THIS PROCESS

Issue	Date	Comments (What has been revised?)	Written By	Approved for content
1	Nov 2014	Changes recommended by the Ombudsman	ER	-
2	May 2016	Revised by Adaptation Policy Working Group	ER	-
3	Sept 2018	Review to include Social Service and Wellbeing Act (Wales) 2014 and GDPR legislation	ER	-
4	Nov 2019	Review to deal with adaptations outside Gwynedd, new renting models, and Welsh Government Housing Adaptations Standard of Service April 2019	ER	-
5	July 2022	Review of terminology and acts references to comply with Renting Homes (Wales) act 2016	LAJ	MG
6	April 2023	Correction of referencing	LAJ	MG
7	June 2024	Full policy and service review for the purpose of a formal consultation.	SLS/MG	Board
8	Oct 2024	Approval following Consultation	SLS/MG	Customer and Assets Committee?

8.0 EQUALITY & DIVERSITY

Through its Adaptations Service Adra aims to promote and respect the dignity of the individual and support them to participate in decisions that affect them. Adra also aims to reduce inequality introduced through the design of some of our homes by giving regard to an individual's views, wishes, feelings, characteristics, and beliefs.

Adra will endeavour not to introduce new inequalities in delivering this service, for example by ensuring that information about the service is available in a format that is accessible and easily understood by our service users.

In considering each case individually Adra avoids providing standard solutions that may not meet an individual's needs or may not be culturally acceptable.

9.0 DATA PROTECTION

A data protection impact assessment has been completed for this policy.

10.0 COMPLAINTS

Adra recognises your right to bring forward a complaint in relation to the exercise of this policy. Any such complaint will be dealt with under the CCpol01 – Complaints and Concerns Policy.



Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation

11.0 REVIEW OF DECISIONS

Adra also recognises the right to request a review of any decision relating to this policy. Any such review will be dealt with following our CCp04- Review of Decision process

Adra will ensure that any decisions relevant to this policy are reasonable and comply with relevant policy and legislation

12. POLICY REVIEW

This policy will be reviewed every 2 years, or in response to changes in legislation, regulatory guidance, good practice or changes in other relevant Adra (Tai) Cyfnyedig Policy