

APPENDIX 1



EQUIPMENT AND ADAPTATIONS POLICY

Housing adaptations can often play an important role to enable tenants or members of their immediate households to remain in their own homes for as long as possible and to achieve their own individual outcomes and the quality of life they wish. The aim then for our service provision to tenants or members of their immediate households is to effectively develop, deliver, manage and monitor the provision of equipment and adaptation from the point of assessment through to provision and post satisfaction & maintenance of installed measure.

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1. **Background**

- 1.1 DGHP original aids and adaptation policy was approved in August 2007 and is due for periodic policy review. This coincided with the introduction of the continuous Improvement framework where **equipment and adaptations** were selected for review and advisory audit undertaken by Beever & Struthers.

2. **Policy statement**

- 2.1 We remain committed where possible and within our resources to meet the identified needs of our tenants or members of their immediate households who require equipment or adaptations (*see appendix 1 for list of adaptation works*) to ensure that they can continue to live in their current home safely and with a reasonable degree of dignity and independence. The effectiveness of the completed adaptation should be the extent to which it meets the individual's needs, sensitively, efficiently and cost effectively.

3. **Objectives**

- 3.1 Our objectives are;
- To have clear criteria by which we will assess all requests for adaptation works.
 - To reconcile the expectations of tenants or members of their immediate households who require adaptations with our overall duty to manage our housing stock effectively through the Asset Management Strategy.
 - Ensure an inclusive approach in the planning and delivery of our adaptation service.
 - Improve the speed, efficiency and effectiveness of our service provision.
 - Promote good practice and partnership working in relation to equipment and adaptation provision to improve outcomes for our tenants or members of their immediate households.
 - To comply with legal and statutory requirements in relation to the provision of disabled adaptations.

4. **Equal Opportunities Statement**

- 4.1 We are committed to providing fair and equal treatment for all people and will not discriminate on the grounds of race, colour, ethnic or

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national origin, language, religion, belief, age, gender, sex, sexual orientation, material status, family circumstances, employment status, physical ability and mental health. Indeed we will positively endeavour to achieve fair outcomes for all.

5. The Disability Discrimination Act 1995

- 5.1 The Disability Discrimination Act 1995 uses a “medical model” of disability and defines disability as;

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse of their ability to carry out normal day-to-day activities.

- 5.2 However, this policy follows good practice guidance and uses a social model of disability, which emphasises the disabling nature of society and the barriers created within the environment and sees those barriers as being what disables people, not the functional limitations or impairment of the person. Disability is thus defined as;

The loss or limitation of opportunities that prevents people who have impairments from taking part in the normal life of the community on an equal level with others due to physical and social barriers.

6. Legal & Regulatory Requirements

- 6.1 The legislation that underpins equipment and adaptation provision in Scotland is substantial and it broadly sets out the duties and powers of local authorities, NHS and Registered Social Landlords. The key legislation is the **Disability Discrimination Act (DDA) 2005**.

- 6.2 Part 3 of the Disability Discrimination Act extends the reasonable adjustment duty to landlords, in relation to premises (both residential & commercial) that they let to disabled tenants or prospective tenants with disabilities.

- The Act makes it unlawful for people letting or selling land or property to discriminate against disabled people and also makes it unlawful to victimise disabled people who make use of, or try to make use of their rights under the law. and
- Places a duty to on us to take reasonable steps to change a policy, practice or procedure, and provide auxiliary aids and services, where it is difficult for a disabled person to let premises, or for a disabled tenant to make best use of the premises and its benefits. Alterations do not have to be made to the physical features of a property but we must allow physical adjustments to be undertaken where reasonable.

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- 6.3 The policy also takes into account the final guidance issued by the Scottish Government on the provision of equipment and adaptations and for major adaptation.
- 6.4 The relevant Scottish Housing regulator Performance Standards is AS2.4 adaptations

We are responsive to the particular needs of applicants and the changing needs of existing tenants, and we adapt properties efficiently to meet these needs. We have good records about adapted houses we own.

7. Trends & statistics

- 7.1 Our overall adaptation figures for 2010 reported to the Investment & Regeneration Committee (November 2010) indicates for the first time a slight reduction in the number of referrals and measures installed.
- 7.2 This dip may simply be explained as a reflection of the operational areas that we are currently installing bathrooms compared to last year. However, this overall dip in total referrals is interesting compared to the highlighted results reported to Customer Services Committee (August 2010) on our tenants census where 44% of the organisations tenants that have been surveyed are over the age of 60, this compares to 25% of the Dumfries & Galloway population (source Government census)
- 7.3 Government Census suggests that Dumfries and Galloway will follow the same population trends as Scotland but to a much more extreme degree. Total population will decline by three times the national rate while the number of over 75s will grow by over 30%. The problem posed by an increasing 'grey' population, dependent on a diminishing economically active or productive segment of the population, will be particularly acute in our region.

8. Partners

- 8.1 A modern service for adaptations that is fit for the purpose for the 21st century will place the views of tenants or members of their immediate households who use the service and the professional trained Occupational Therapy team at the centre of its operation. The process that delivers our equipment and adaptation service will be one of partnership across a wide range of internal and external organisations e.g. Councils; Occupational Therapy, Social Services and Housing teams, DGHP; Investment & Regeneration and Housing Management teams and our various independent Contractors.
- 8.2 While recognising that our adaptation service is planned and delivered by a multiplicity of partners, it is important that the tenant or members of their immediate households experiences a seamless service. This will

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be achieved by closer team working and the setting up of an agreed protocol (defines arrangements, roles, responsibilities) between the Councils Occupational Therapy team and DGHP.

9. Training & Collaboration

- 9.1 We accept that those responsible for delivering our adaptation service need to work together. We can achieve closer working through joint training and understanding of individual roles within the overall service, inter agency monitoring and introduction of a more local collaborative working model e.g. Local Occupational Therapy staff talking, meeting and resolving requests with our local Housing Management or Investment teams.
- 9.2 The effectiveness of this policy is dependent on skilled staffing across all our partners. We will provide learning opportunities to raise awareness on disability issues and the Adaptation Policy and procedures. We will introduce joint training on disability issues with relevant statutory and voluntary organisations.

10. Initial Contact - Occupational Therapy Team

- 10.1 Any tenant can contact or be referred (e.g. by our Customer Service centre) to Dumfries & Galloway Councils Occupational Therapy team. Whoever the tenant contacts the aim should be to deal effectively and quickly with the enquiries wherever they initially impact. The Occupational Therapy team are the professional qualified staff who will undertake a needs assessment of the tenant or family member which may also include independent medical assessment.

Note the preferred point of initial contact for tenants should be with the local Occupational Therapy team

- 10.2 Good assessment practice is fundamental to the provision of our adaptation service. The assessment should be in the context of promoting **minimum intervention and maximum independence**. The process should be transparent, equitable and offer informed choice to the tenant. Timely equipment and adaptation will compliment a range of tenant needs and the management of conditions and our service should be viewed as integral to the delivery of wider service objectives.
- 10.3 The Occupational Therapies will identify the desired outcomes for the individual tenant and support individualised interventions. Tenants or members of their immediate households can wait some time (critical need 6 weeks & substantial need 12 weeks, *note OT also deal with urgent matters within days*) for assessment as local occupational therapist caseloads are at capacity The Occupational Therapy team will inform the tenant and DGHP of the outcome of the assessment and of its prioritisation.

Note major adaptation should only be provided when all other reasonable options have been ruled out.

11. Alternative Accommodation

- 11.1 Whilst everyone supports the overarching principle “minimum intervention, maximum independence” we have also to be practical and accept that **not all homes can be adapted** to suit this principle and that as a responsible Registered Social Landlord (RSL) we will undertake an option appraisal assessment of the prospects of transferring the tenant or members of their immediate households to existing suitable alternative accommodation. This may meet some of the needs identified or the alternative property is more suitable to be adapted this may include transfer to another RSL. The works are also considered on the grounds of being **reasonable and practicable** taking into account the type, age and condition of the property. However, it is recognised that in most cases alternative accommodation is not feasible for a variety of practicable reasons. (See also paragraph 19 incentive to move)
- 11.2 Where the decision is made that the tenants or members of their immediate households needs are best met through a move, then this will be assessed in line with our current allocation policy (or as revised) and we may also consult with other local RSL on suitable alternative accommodation.
- 11.3 Each case will be monitored by allocation staff and if after six months No suitable housing has been found, we will then hold a review meeting with OT, Allocations staff & management to review case and determine possibility of re-housing.

12. Adaptation

Where the tenant or members of their immediate households is awarded 5 or 5+ points we are notified via e-mail which sets in train our service delivery.

- 12.1 The Scottish Government guidance describes equipment and adaptations as a range of products and changes to the building that enable tenant or members of their immediate households who are affected by ill-health, traumatic injury, disability or the effects of aging to carry out ordinary activities of daily life. It includes assistive technology, but not anything that is invasive to the body.
- 12.2 We have the following Permanent Adaptations which are intended to remain in the property and relate to alterations to the structure of the property (subject to resource availability) and are classified as minor or major.

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- **Minor** adaptations cost on average approx. £500 and generally does not affect the overall structure of the property e.g. handrails, grab rails, lever taps, modification of entrance steps, widening of garden paths, widening or rehung of a door, alarm call or loud bell, fluorescent lights.

The policy continues the practice that these minor adaptation works are undertaken by the Housing Management technical team via our day-to-day responsive repairs service in accordance with our stated priority timescales and within the overall budget provision of Repairs and Maintenance.

- **Major adaptation/Extensive works** are defined as permanent structural changes to the property e.g. ramps, widening to permit wheelchair manoeuvre, stair lifts or hoists, alterations to kitchens, bathrooms and provision of improved new heating systems.

In practice most referrals for major adaptation/Extensive works are added to one of our existing investment programmes and undertaken by one of our main contractors; small ramps are undertaken by both the technical team and investment staff who also undertake larger ramps where planning or warrants are required.

Appendix 1 gives more examples of the adaptations undertaken.

13. Performance standards

- 13.1** We acknowledge that delays in the delivery of our services may impede an individual's ability to function and can cause greater dependency. Thus timeous provision of our adaptation services can be seen as more cost effective than providing any form of individual care.
- 13.2** **Minor equipment and adaptation** are issued as a responsive nature on a "first come, first served basic" by the Customer Service Centre or technical team via our day-to-day responsive repairs service in accordance with our priority timescales. Generally the works are not classified as Emergency repairs but are issued as P2 (2011 timescale 24 hours), P3 (2011 timescale 12 working days) or P4 ((2011 timescale 28 working days) depending on the adaptation and assessment by the Occupational Therapist. Tenants are offered fixed appointment times.
- 13.3** This policy introduces an **agreed fast track service** (in effect an Emergency line P1 (2011 timescale 4 hours)) which recognises an urgent need to help assist our partners such as facilitating hospital discharges. All referrals request from our Occupational Therapy team partners that have a priority rating of 5+ will be treated as Emergency repair.

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13.4 Major adaptation/Extensive works as stated in paragraph 12.2 above cover a variety of items and a fixed timescale is not practical. However, it is accepted that **these works are treated by our staff and contractors as high priority and in each case will agree a timescales with the individual tenant**. As a guide we would hope that a referral request is visited by one of our staff within 10 working days and that we would complete the majority of the works within twelve weeks of instructing the contractor to proceed (*where practical*).

14. Cost floor approval extensions

14.1 For all adaptation works over a cost floor of £15,000 we are required to seek approval from the Scottish Government prior to starting the planned improvements.

14.2 Rent Review – we will review the rent on a property where major adaptation works are carried out to create additional room(s). The rent charge will be reviewed in line with our Rent and Service Charge policy and with due regard to the rights of disabled persons under the Disability Discrimination Act 1995.

15. Voids

15.1 Housing Management staff should ensure both at pre-term and void inspection that they record information on adaptations that have been undertaken and the suitability of the property for use by a disabled person (*see appendix 3 for list of equipment to be recorded*). The external environment (lots of steps, side of hill), locations of shops & services, transport should also be included within the overall assessment. All ground floor properties and flatted accommodation with lift access should be assessed for suitability with or without further adaptations.

15.2 Properties **should be relet with adaptations that have previously been carried out**. Permission to remove major adaptation must be sought from the Asset Management & Policy Manager and will only be granted in exceptional and rare circumstances.

16. Adaptation Register

16.1 We are responsible for developing and updating a database to record all “major” adaptations carried out to our properties. To ensure that a comprehensive “adaptation Register” is established we will work together with Housing Management staff to identify and agree a list of major adaptations which will be recorded within our Keystone Asset & Asbestos Management system.

17. Right to Buy

- 17.1 An application to purchase a property which is “purpose built” or “adapted” to meet the disability needs which forms part of a “group” of houses may be exempted from the Right-to-Buy. Single adapted properties will be treated as mainstream stock.
- 17.2 Adaptations are not undertaken to any property, which is subject to a right to buy application or where the tenant is waiting to transfer to alternative accommodation.
- 17.3 If the application to purchase is withdrawn, any outstanding adaptation referral will be progressed in line with current policy and funding availability.

18. Exception to adaptation policy

- 18.1 Major adaptation/Extensive adaptation will not normally be undertaken to our homes if they are under or over occupied or generally where we have been asked to install a wet floor/level access shower in a flat at 1st floor or above, where there is no lift (non of our tenement flats have lifts) or in bathrooms of family sized accommodation and alternative accommodation may be the right choice but in accordance with the current allocation policy.

19. Incentive to move (consultation review Question)

- 19.1 In recognition that the costs incurred in moving to alternative accommodation may be seen as a barrier for tenants or especially where the tenant is under occupying the property we will offer a “Home loss” payment as an incentive to transfer to more suitable accommodation that **WILL NOT** require extensive equipment and adaptation works. The maximum home loss payment is £1,500 plus £400 and removal costs which in comparison to the cost of a curved stair lift £4,500, Through floor lift £9,000 or extension £10 – 25K may be seen as better value in some cases.

20. Investment Programme

- 20.1 Our investment programme takes the needs of disabled tenant or members of their immediate households into account through the specification of works and in particular at the initial contact stage.
- 20.2 As part of the planning process for the improvement works we will discuss with the tenant and members of the immediate households the planned works and give an honest assessment of the disruption they face. Our staff and contractors will plan the works in consultation with the tenant and works will be arranged around the tenant.

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- 20.3 In certain circumstances we will arrange for the tenant and members of the immediate households to be decanted to alternative temporary accommodation. If decanted the Clark of Works will keep in weekly contact with the tenant and advise on progress/delays.

21. New Build

- 21.1 We plan to build around 1,000 new homes over the next six years. All new homes are built to Housing for Varying Need standards. Will we build a number to wheelchair standard accessible standard or is this covered by lifetime?
- 21.2 All of our new build homes will meet wheelchair accessible standard, however, the external environment of some of these homes may not be suitable because of the location and external conditions e.g. steep gradients.

22. Information

- 22.1 We will provide user-friendly information on the adaptation service for our tenants and wider community. The information will be in an easy to understand format, written from a user's perspective and made available in other formats as required. The information will be available in leaflet form at our local offices, on our website and at least yearly as an article with "open Door".

23. Funding

- 23.1 Funding for our equipment and adaptation services comes from two main sources; tenant's rents and the Scottish Governments annual funding allocation.
- 23.2 In 2009-10 we spent £471,467 on all equipment and adaptations repairs/improvement, this was over the Scottish Government allocation by just under £40,000. The true figure may be higher as some lines are coded to general and improvements such as heating covered under the individual investment project.
- 23.3 Where possible, we will reuse equipment that has become redundant in its current situation such as stair lifts.

24. Monitoring, Satisfaction & Policy Review

- 24.1 We will undertake an annual review of our equipment and adaptation policy and service which will be reported to the Investment & Regeneration Committee. The report will include comments and appraisal from Dumfries & Galloway Councils Occupational Therapy team so as to ensure that we are meeting our legal requirements and reflecting best practice

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- 24.2 We will undertake an by-annual tenant's satisfaction survey covering both minor and major/extensive equipment and adaptation works and again include these in our annual review report.
- 24.3 We will review this policy every THREE years. More regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance.

25. Complaints Policy

- 25.1 Our aim is to get it right first time. However, we do have a Complaints Policy which tenants may use where they are dissatisfied with this policy or its operation or otherwise want to raise a dispute. The Complaints Policy is available as a separate document from our local offices and on our website and is available in other formats as required.

26. Relationship with other policies

- 26.1 This policy should be read in conjunction with the;
- Allocations Policy
 - Asset Management Strategy
 - Equality and Diversity Strategy
 - House Sales Policy
 - Health & Safety Policy
 - Repairs and Maintenance Policy
 - Rents and Service Charges Policy
 - Tenant Participation Policy
 - Void Management Policy

Appendix 1

List of equipment and adaptation works

Adaptation works	Adaptation works
General alterations	Electrical and heating services
Extensions or alterations to provide bathroom, W.C. or bedroom etc with level or suitably ramped access	Re-fixing sockets at convenient level; new sockets or light switches; alarm call or loud bell; relocation of prepayment meters, central heating; thermostat or heating controls; fluorescent lights, warning systems e.g. flashing lights; power supply for hoists and relocation of main switches for gas or electricity
Garaging and external facilities	Provision of lifting aids
Widening of garden paths; carport or undercover access to property; remote control garage door opener	Reinforcement of ceilings and provision of track for personal hoist
Approaches to entrance doors	Acoustic insulation
Modification of steps; handrails or balustrading to ramps or steps; doorcall, entryphone system and external lights	Acoustic insulation
Doors and Windows	Entrance halls
Widening or re-hanging doors to permit wheelchair manoeuvre; substitution of sliding or bi-fold doors; suitable ironmongery; remote control openers; conversion of windows to French windows where no other wheelchair access; alterations to give better sight lines for tenants in wheelchairs and larger windows for visually impaired tenants	relocation of clothes hanging rail (also in bedrooms)
Staircase and vertical circulation	Kitchen
Additional handrails; stair lifts or vertical home lifts	Alterations to provide food storage units, worktops and sink units at convenient levels; non slip flooring; built in cooker for use by disabled tenants; waste disposal units
Water Services	
Lever taps; re-fixing taps at convenient height; remote control valves, thermostatic control for showers and relocation of control valve for mains water supply	

Appendix 2

Targets and timescales for processing adaptations

	Action	Target Timescale
Referral	Acknowledge receipt of referral -	Within 7 working days
Assessment	Assessment & recommendation Split into standard and complex assessment	Urgent within 5 working days Critical need within 30 working days Substantial need within 60 working days
Recommendation	Once assessment completed OT will forward recommendation to DGHP contacts	Within 10 working days
Information to tenant	We will inform the tenant and OT of go ahead with recommendation or deferral pending review of alternative accommodation or funding	Within 7 working days
The adaptation	Minor adaptation P1 4 hours P2 24 hours P3 12 working days P4 28 working days Major/Extensive - aim is to complete within 12 weeks of order to contractor	Timescales as repairs services Within 12 weeks of order to contractor
Joint Visit	We request OT to participate in a joint visit Void Other request	Within 20 working days Within 30 working days
Completion	We will notify OT when all	5 working days from

	major/extensive adaptations are completed	completion
Advice prior to letting	Advice, home visit prior to letting	Within 20 working days from e-mail request

Appendix 3

Adaptation Register

To ensure that a comprehensive "adaptation Register" is established we will work together with Housing Management staff to identify and agree a list of major adaptations which will be recorded within our Keystone Asset & Asbestos Management system. The draft list of items are;

Equipment	Recorded as	
Wet floor	Wet floor	
Ramp to Front entrance	Level access	
Adjustable kitchen units	Adapted kitchen	
Special bath	Special bath	
Curved Stair Lift	Curved Stair Lift	
Emergency call system	Emergency call system	
Hoists	Hoists	
Lifts – External	Lifts – External	
Lift internal	Through Floor	
Wider doors	Wider doors	
Additional WC	Additional WC	
Straight stairlift (OT)	Straight stairlift (OT)	
Shower Room	Shower Room	

Definitions

Adaptation – is a modification to a disabling environment in order to restore or enable independent living, privacy, confidence and dignity for individuals and their families – providing an individualised solution to the problems of people experiencing a disabling environment.

Disability – can arise from a wide range of impairments which can be;

- Sensory impairments – affecting sight and hearing
- Impairments with fluctuating effects such as rheumatoid arthritis and epilepsy
- Progressive – motor neurone disease, muscular dystrophy form of dementia
- Organ specific – asthma, thrombosis, stroke and heart disease
- Mental health conditions – depression, schizophrenia, bipolar affective disorders
- Produced by injury to the body or brain
- Developmental – autistic spectrum disorders (ASD), dyslexia and learning difficulties

Social services eligibility

Critical – The risk of major harm to a person or major risk to independence

Substantial – The risk of significant impairment to the Health & well-being of a person or significant risk to independence.