

Aids and Adaptations

Responsible Officer:	Assistant Chief Executive Asset Management
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Scope:	Incommunities HA

Aids and Adaptations Policy

1.0 Introduction

- 1.1 The purpose of this policy is to set out the principles that will be applied in relation to the provision of aids and adaptations to customers of Incommunities.

2.0 Statement of intent

- 2.1 Incommunities is committed to facilitating the provision of aids/adaptations to properties, or the provision of adapted rented accommodation, where this will directly relate to improving the quality of life of disabled people and their carers.
- 2.2 Incommunities will ensure that cases are dealt with as speedily, effectively and as sensitively as possible; complying with all relevant service standards. Where individual cases fall outside this policy, full consideration will be given and discretion used to approve a case or refer the case to a Director for a decision.
- 2.3 Incommunities wish to ensure that any aids and adaptations work undertaken create accessible, high quality and future proofed properties that enhance the value and future ability to let said properties. Where the budget allows, Incommunities intends to complete works along the 16 principles of the Lifetime Homes Standard.

3.0 Legislative Framework

- 3.1 Where a local authority believes that Registered Providers (RP) should make a contribution to the costs of adaptations in their own properties this should be negotiated and established through formal agreement.
- 3.2 Whilst there is no specific obligation on a landlord to fund such work and the Homes and Community Agency (HCA) has no statutory duty to subsidise the costs involved, it may be considered good practice for a responsible social landlord to respond to the needs of its disabled tenants. Good practice for Registered Providers in identifying need, liaising with statutory authorities and carrying out works of adaptation is set out in guidance from the HCA.
- 3.3 In the case of stock transfers from local authorities to Registered Providers, the new RP tenants will remain eligible to apply to the housing authority for a Disabled Facilities Grant (DFG), and they will be assessed for needs on the same basis as private owners and tenants. As part of their contractual negotiations, the authority and the new landlord should therefore agree how the management of the needs of disabled tenants will be addressed and reflect this in clear public and management guidance.

However, *"It is not lawful for persons in any tenure to be obstructed in making an application for assistance through a DFG."* (House of Commons library, Feb 2013, DFG's England)

- 3.5 Therefore Bradford Council may not hinder Incommunities tenants from applying for a DFG.
- 3.6 The Housing Corporation Capital Funding guide: Repairs Book Chapter 6 Minor and

Miscellaneous works Section 6.7.1 sets out the position on arrangements for RP Tenant's and the provision of adaptations:

“As good social landlords the Housing Corporation expects RSL's to consider the need for Adaptations. However, there is no statutory responsibility for the Corporation to fund Adaptations.”

- 3.7 The statutory responsibility for funding Adaptations is the duty of the welfare authority (Chronically Sick and Disabled Persons Act 1970 and the 1996 Housing Grants, Construction and Regeneration Act).
- 3.8 This guidance does not alter the mandatory entitlement of RP tenants to a DFG in the same way that, say, an owner occupier might apply for and receive an adaptation from the main DFG programme.

4.0 Provision of services within the legal framework

- 4.1 Legislation in relation to the delivery of adaptations is complex.
- 4.2 **The Chronically Sick and Disabled Persons Act 1970** states the LA must assess needs and to arrange for appropriate assistance to be provided in particular 'to arrange practical assistance in the home, and any works of adaptation or the provision of additional facilities designed to secure greater safety, comfort or convenience (Section 6).
- 4.3 **The NHS and Community Care Act 1990** establishes a requirement that a needs assessment must be carried out where it appears to the social services authority that any person for whom they may provide or arrange community care services, may be in need of such services. This is the appropriate context within which to establish criteria for access to assessment, including an assessment that may identify needs that can be met by adaptations to property. The Act further provides that where services of the health or housing bodies may be needed, the social services authority should notify them and invite their assistance.
- 4.4 The **Care Act 2014** sets out in one place, local authorities' duties in relation to assessing people's needs and their eligibility for publicly funded care and support. Practically for an RP, it means if a tenant asks for minor adaptations, we should consider them without the need for extensive documentation or “professional” input. In effect take a customer's request at face value and respond appropriately with due diligence.
- 4.5 **The Carers (Recognition and Services) Act 1995** extended the right of assessment to carers where the person cared for is eligible to receive an assessment (or re-assessment) under Section 47 of the 1990 Act. The references in the Act to the needs of carers of disabled children are further expanded in **The Carers and Disabled Children Act 2000**. This provides powers for social services to provide any services which the local authority sees fit to provide and which will in the local authority's view help the carer care for the person cared for.
- 4.6 **The Children Act 1989** requires local authorities to provide a range of family support services for children in need. The definition of children in need includes disabled children. Schedule 2 of this Act outlines the range of services which can be provided and Paragraph 6 of this schedule requires that local authorities provide services to minimise

the effect on disabled children of their disabilities and give such children the opportunity to lead lives which are as normal as possible.

- 4.7 **The Equality Act 2010**, which is intended to prevent and address disability discrimination and disability-related harassment where goods, facilities and services are provided to the public and replaces the **Disability Discrimination Acts of 1995 and 2005 (DDA)**.
- 4.8 Therefore the Local Authority has a statutory duty to provide grant aid to disabled people for a range of adaptations to their homes through the **Housing Grants, Construction and Regeneration Act 1996**.
- 4.9 Since 1990 the obligation to provide Disabled Facilities Grants (DFG's) to eligible applicants for eligible work (subject to the test of the applicant's resources) is primary, absolute and remains irrespective of whether other assistance is provided by a social services authority or other body.
- 4.10 The general power under **Article 3 of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002** enables housing authorities to give discretionary assistance, in any form, (e.g. grant, loan or equity release) for adaptations. The financial assistance can also be provided indirectly to the disabled person through a third party. There is no restriction on the amount of assistance that may be given. Discretionary assistance may be given in addition, or as an alternative to mandatory DFG. Assistance can be given under Article 3 for a wide range of purposes for example:
- To provide small-scale adaptations to either fulfil needs not covered by mandatory DFGs or, by avoiding the procedural complexities of mandatory DFGs, to deliver a much quicker remedy for urgent adaptations;
 - To provide top-up assistance to mandatory DFG where the local authority takes the view that the amount of assistance available under DFG is insufficient to meet the needs of the disabled person and their family.

5.0 Eligibility for Aids and Adaptations

- 5.1 Adaptation works (as outlined in CBMDC Occupational Therapies code of guidance) will be considered only where the applicant is "substantially and permanently handicapped" as stated in Section 29(1) of the National Assistance Act 1948, and further defined in the Disability Discrimination Act 1995, replaced by the Equality Act 2010. The impairment of the applicant must have lasted or is likely to last for at least 12 months.
- 5.2 Major adaptations will only be authorised where the applicant is a permanent resident of Incommunities, or where the applicant is intending to become a permanent resident. No adaptation works will be carried out for lodgers or temporary visitors. The Disability Services Manager has discretion to commence works at a void property in order to make it accessible for an incoming disabled tenant.
- 5.3 Requests for adaptation works from those seeking asylum with exceptional/indefinite or discretionary leave to remain will not be met under ordinary circumstances due to their temporary status. Those applying for permanent leave to remain as a British Citizen that may be classed as migrants or immigrants will also be in the above category. However, wherever it is reasonable and practical, existing adapted accommodation may be utilised

where a need has been identified, so that as far as is practical we will try to assist. Alternative adapted accommodation should also be sought through other forms of tenure.

- 5.4 In cases where a child is disabled and the parents are separated, the adaptation work will usually be completed at the property of principal residence or at the most economically viable home to convert. If “shared care” is established, the above will still apply but we would agree to one of the parties approaching Bradford Council for Disabled Facilities Grant assistance.
- 5.5 All operatives can expect a clean and safe environment in which to work. Should a property not be in a fit state to commence work in, a representative of Incommunities will ask the client to bring to a reasonable standard, followed up in writing, agreeing a period of time (usually 28 days). However consideration should be given to the client’s physical and cognitive abilities to achieve this and the use of carers, social workers, other professionals should also be made aware to assist in a solution.
- 5.6 The Able Living team and/or Building Services and/or lifts section will confirm prior to ordering works that the client who requires the works is registered at this tenancy. Should the person not be registered, we will ask that they contact Incommunities and be included on the tenancy accordingly before works commence. All works must comply with current Building Regulations and meet Part M guidance.

6.0 Service Delivery – Minor Adaptations

- 6.1 The timely provision of modest adaptations can often sustain the independence of individuals who may otherwise more speedily become dependant upon more substantial adaptations. Incommunities deem this to be an important preventative service to residents. It is also the case that for many items, the administrative costs involved in the statutory assessment to provision, is greater than the adaptation itself. Incommunities will therefore make access to minor adaptations as easy as is practicable.
- 6.2 Many external alterations are simply improvements or repairs to poorly designed/installed paths/access to ex LA stock that when completed are of benefit to all users. It is inefficient to insist on full OT assessments for many such “repair related requests”.
- 6.3 Minor works are defined in law as less than £1000 in value being specified smaller works and equipment, delivered through the responsive repairs service. Legally Incommunities must enable such works to be carried out in its homes and fund said works, if the Welfare Authority is not assisting.

The Scope of the Service

- 6.4 Incommunities minor adaptations are specified types of works which have a low level of potential risk to users and those who use or visit the property (e.g. grab rails). The Occupational Therapy Department (OTD) will continue to assess and refer clients to Incommunities, should the client use that process. A proforma and pathway is well established amongst CBMDC/hospitals for referring requests to Incommunities.
- 6.5 Where the tenant, housing officer or other professional identify a need for minor adaptations under £1000, they may also make a request direct to our repairs team,

without needing to access the OT process. Many small portable items of equipment (aids) such as walking sticks, frames, bath lifts and W.C.aids will not be provided by Incommunities, as such items fall within the responsibility of the statutory agencies such as Social Services and the PCT. Many items are delivered to the property and Incommunities role is only to fix them in accordance with manufacturer's instructions: e.g. a w.c frame.

- 6.6 Noting the Care Act 2014, referrals from professional bodies, social services, health-care professionals etc. will be accepted without the need for assessment, although referrers may be asked to confirm that the adaptation requested is appropriate, and addresses the perceived need if the request is extensive: i.e. large path or handrail alterations.
- 6.7 Incommunities will process minor adaptations within 28 days (if equipment has to be ordered) or 10 days (when equipment is in stock) to ensure residents' needs are speedily met.
- 6.8 Applications will be accepted at face value from residents or members of their household. Staff will not make any medical judgements. Housing and Building Services staff will exercise their discretion in evaluating and processing applications and completing works. Whenever needed, advice will be provided by the Disability Services Manager.
- 6.9 Works are usually concerned with the provision of small items of equipment. The table below outlines the kind of adaptation that this element of the policy is intended to deliver. Requested works outside the above specified list will not be unreasonably refused. However, approval and authorisation must be given by the Disability Services Manager.

Incommunities Minor Adaptations Approved List TABLE 1:

RAILS	Galvanised Rails, Grab Rails, Newel rails Hand rails, Stair handrails
KITCHENS AND BATHROOMS	Window opening equipment (non-electric) Lever taps, Fixed Toilet Frame, Carer Screen
ACCESS	level door threshold, Short concrete ramp/flag alterations Door Widening (1 only) Door entry intercom (simple speaker phone)
VISUAL IMPAIRMENT	Staircase applications External lighting to external door
HEARING IMPAIRMENT	Flashing/amplified doorbells Vibrating Flashing Smoke alarm alerts
GENERAL AND SAFETY MATTERS	Door and wall protectors Electric sockets/switches (1 only)

7.0 Service Delivery – Major Adaptations

- 7.1 Major adaptations are more substantial and expensive works costing more than £1000. In line with DFG guidance on mandatory grant limits, works approved will not exceed £30,000. Major adaptations often facilitate the installation of fixtures or fittings which may require changes to the arrangement of and, on occasions the structure of a

property. Typical Major Adaptations are shown in the table below and the process can be seen in Appendix 2.

Typical Major Adaptations TABLE 2

Bathroom Fittings and Alterations	<p>Showers over Baths. Level Access Showers (<6” step in tray) Wet room shower conversion Wash/dry w.c Larger or reposition of w.c pan. Hydraulic raising bath Height adjustable/auto wash hand basins</p>
Kitchen Fittings and Alterations	<p>Specialist Kitchen Units Low Height Surfaces Height adjustable appliances Creation of Turning Space</p>
Providing front and rear access to homes, rooms and facilities	<p>Ramps and Pathways Stair lifts, Through floor lifts Widening Doors Low Level Light Switches and raised power sockets Internal room conversions Bathroom, bedroom (or both) extensions.</p>
Street to property access	<p>Drop Kerbs within IC land boundaries Handrail provision with IC land boundaries Driveways</p>

This list is not exhaustive and the works can vary widely dependant upon individuals need and the configuration and location of the property.

- 7.2 Major adaptations will usually be subject to the assessment and recommendations provided by an Occupational Therapist or in certain cases an alternative recognised agency. In exceptional cases the Director (s) or Disability Services Manager may authorise provision without the need for such assessment.
- 7.3 All aspects of the evaluation, approval and authorisation of major adaptations are centrally controlled by Incommunities the Disability Service Manager.. The budget holder is the Disability Services Manager who maintains links and working relationships with statutory and voluntary agencies which may have a role in providing the service.
- 7.4 General repairs to adaptations, e.g. showers, rails, etc. will be carried out as part of the day to day repairs and maintenance process (as these form part of the fixtures and fittings of the property). Any contractors or in-house resources who carry out an installation will provide a 12 month defect period for works undertaken, excluding tenant damage or manufacturers defect.
- 7.5 Stair, Step or Through floor lifts.**
 - 7.5.1 The installation of these is delivered through our “lifts” section and must comply with:
 - “LEIA” (Lift and Escalator Industry Association) regulations.
 - EN 81-1:1998
 - LOLER – Lifting Operations and Lifting Equipment

- PUWER – Provision and Use of Work Equipment Regulations
- Electricity at Work Regulations
- COSHH – Control of Substances Hazardous to Health

7.5.2 Lifts enable users to maintain independence in their property but it is rare that further works will not be needed in the future, such as level access showers or ramping. It is good practice to discuss with the client such future issues before making a decision to install.

7.5.3 Through floor, straight or round the corner lifts maybe considered for installation where practical, within current regulations. Sufficient space must be allowed for the safe operation of a lift and its installation must not block any point of access/escape in case of fire.

7.5.4 Curved track or through floor lifts are very expensive, compared to straight and they cannot be recycled, in general other options such as rehousing should be recommended first.

7.5.6 Incommunities' lifts section should recycle and re-use all types of lifting equipment where practical and feasible to reduce costs and to lessen the impact upon the environment.

7.5.7 Where a tenants wishes to install their own lift, they must submit a written specification and plans detailing such works. This can usually be obtained free of charge from the prospective lift installer.

7.5.8 In the first instance this request should be to the Lifts section for inspection and approval. All works must be carried out to Incommunities' own lift's policy specifications and in accordance with current building regulations. Incommunities may specify that these aids or adaptations are removed on termination of the tenancy and the property re-configured to Incommunities satisfaction.

7.6 Access to/from the client's home (pathways, ramping etc)

7.6.1 Incommunities sheltered housing schemes will have Part M compliant pathways or ramped access to the principal entrance of the scheme. We are unlikely to attempt to provide additional ramping to other entrances, e.g. rear/side doors due to cost, but we will consider any requests made.

7.6.2 General needs stock and independent older person accommodation including flats and bungalows are unlikely to have pathways or ramping that is Part M compliant and suitable for wheelchair or mobility scooter use without extensive building works.

7.6.3 We are unable to alter pathways, gate posts, fencing, driveways, existing ramps, door entrances, convert manual doors to powered doors or provide any form of storage or charging facilities for mobility scooters. The client must take this into consideration before they purchase such a vehicle.

7.6.4 We will consider alterations to pathways, gate posts, fencing, driveways, existing ramps, door entrances and conversion of manual doors to powered doors for permanent self propelled manual wheelchair users, or permanent user or attendant controlled electric wheelchairs. Any such works requests must be supported with a referral from Occupational Therapy.

7.6.5 The use of portable or temporary ramps is to be promoted to customers who require ramping for mobility scooters and advice on their purchase or fitment can be given from Incommunities or CBMDC.

7.6.7 Where ramping/external alterations (including step or external stairlifts) are possible within building regulations, but the likely cost and scheme of works will exceed £3000, careful consideration is given to the overall outcome and solution that is achieved by its likely completion. Factors such as other adaptations works requests outstanding at the property (thus requiring additional funding), occupancy, length of residence and long-term ability to sustain the tenancy will all be taken into account before reaching a decision. In such cases due to the topography of the site and indicative cost of works it may not be possible to facilitate the request. In these cases where a request has been refused, support to find alternative accommodation will be provided.

7.6.8 Incommunities adapted homes, that are suitable for wheelchair users can be accessed through the “Value Based Lettings system” and in the first instance the tenant should liaise with their housing officer to register a transfer application and seek such properties. Further housing options advice can be sought at www.bradford.gov.uk/housing (tel 435999) and www.openmoves.co.uk

7.6.9 See also Appendix 1 “Guidelines on use and storage of mobility scooters and motorised wheelchairs within Incommunities properties and housing schemes”.

8.0 Refusal of Adaptation Requests

8.1 Incommunities are unlikely to invest in the provision of adaptations where the benefit achieved the resident is short term¹, it is not reasonable or practicable or where strategically, it makes no sense to do so. Recognising the sensitivity of such cases, decisions to refuse adaptations on this ground will always be made by the Disability Services Manager (or a Director).

8.2 In summary such circumstances may include:-

- When the applicant occupies a property that is scheduled for demolition or for major refurbishment within the next two years
- Where the resident is actively seeking rehousing
- For a new tenant.
- Level access/wet room shower to an inaccessible property.
- When the adaptation requested is not structurally practicable.
- Where a property is under occupied and extensive adaptations are requested.

8.3 Criteria for considering alternative solutions or declining a case.

8.3.1 To protect Incommunities’ investment in its stock and to enhance letting any potential void properties, careful consideration should be given to completing some schemes of

works in varying property types. The following, whilst not exhaustive, should be considered before a case is approved/declined:

- The topography and the built environment surrounding the dwelling is accessible so that current and future tenants have access to amenities such as transport, shops, health/welfare, cultural facilities etc. and can live independently.
- When a request for bath removal and level access shower/wet room installation is made, to a first or above floor (non passenger lift served) flat, or house/maisonette, the request will be usually declined.
- If considering installing a level access shower/wet room installation to a first or above floor (non passenger lift served) flat, or house/maisonette, consideration must be given to further works that maybe required. An assessment is required of the external access and internal circulation/staircases to determine the technical feasibility and cost of resolving these issues in the future should the client's mobility deteriorate further.
- Where bathing works are requested to a property that has poor external access, consideration must be given to the client's future prognosis, current needs and ability to carry out daily tasks, in conjunction with how realistic it is to re-let that property should it become vacant in the future.
- Works will not usually be carried out if the applicant is under occupying their property e.g. a single person in a 3 bed house. Increasing applicants have the "bedroom tax" to pay. Some tenants may be in receipt of transitory, discretionary housing benefit, or may be paying the shortfall: but dud consideration to "affordability" of the home should be considered. Assistance will be given to locate an alternative adapted home.
- The applicant will not have approved works authorised where they are actively seeking alternative accommodation i.e. a member of the open moves choice based lettings scheme or other such rehousing scheme. The applicant will be asked to withdraw their housing application in order that we may consider completing the works and they will be advised that we are unlikely to be able to assist with a future transfer once the works have been completed, unless there are special circumstances to consider.
- On commencement of a new Incommunities tenancy no adaptation work will be carried out where the applicant has failed to inform the Welfare Authority or Incommunities of a potential need for adaptations. E.g., client accepts a tenancy via Open Moves Homes and then requests a ramp, stairlift and level access shower to their home. It is reasonable to assume the client knew they would require these alterations at the point of taking the tenancy and thus could have informed Incommunities/able living who may have identified an existing accessible property. Applications may only be considered if disability has arisen, subsequent to taking the tenancy, i.e. arisen from either accident or sudden debilitating illness.
- If a property is due to be part of a major improvement scheme and an application for an adaptation is outstanding, consideration will be given to including the works as part of that scheme instead. There may be scope to build the adaptation (if approved) into the improvement scheme to be more cost effective than a bespoke "one off job". Incommunities has an agreed shower tray/wet floor bathroom standard that is to be adopted as part of our Decent Homes Standard.

- Once a home has been modernised, we are unable to accept further requests to alter/remove fixtures or fittings or convert any part of that property within a five year period of the completion of those works. Commonly requests are received to alter bathrooms within very short time periods after major regeneration has been completed. This is not sustainable to the company.

9.0 Customer Debt Policy

- 9.1 All tenants rent accounts will be checked before works commence to ensure they are not in debt. Providing they are not at Notice of Seeking Possession (NOSP) or a further stage (court) and the Disability Services Manager is satisfied regular payments are being made to clear any debts, works may commence. If they are at NOSP or further, the account should be checked with the Incomes team to establish the tenant's security of tenure. The tenant will be made aware that works maybe cancelled or delayed subject to (a) a regular payment plan (b) debt being cleared (c) NOSP or court order being rescinded. Tenants must adhere to the Incommunities Customer Debt Policy.
- 9.2 The Disability Services Manager has discretion to consider cases on their own merit and may complete works where the client maybe at significant risk if adaptations are not completed.

10.0 Gardens

In order to undertake any works in this area, Incommunities expects that a garden shall have:

- Lawns mown and edged, trees and bushes pruned, hedges trimmed and in general be weed free and in a general satisfactory and well-maintained condition
- Any sheds, outbuildings, garages or other such structures should be in good serviceable condition and safe. If they require relocation that is the tenants responsibility, unless it/they were a permanent structure provided by Incommunities at the start of the tenancy
- The area should be free from refuse, litter or anything prejudicial to health
- The tenant is responsible for removal of vehicles, autoparts, machinery that may obstruct
- Any animal compounds/kennels that require relocation is the responsibility of the tenant, likewise the cleaning and leaving of any such areas used by animals in a sanitary condition.

11.0 Fencing

- 11.1 Before commencing works, the Incommunities Aids and Adaptations service should ascertain that all fencing that should be provided is there and is repaired/provided as required. In addition any proposed fencing programmes should be factored in and works planned in conjunction, if at all possible.

11.2 Likely fencing schemes are of a “safety” type; Our interpretation is that the provision of such works are to reflect the needs of clients with autism/ADHD that need safe/secure play areas to be contained within and to enjoy as much as is practicable safe play and fresh air. Often funding maybe available from the Welfare Authority and this route should be explored. This does not mean an entire garden must be fenced, but typically an “area” provided for safe play: noting that a parent (s) or carer/responsible adult would supervise such play.

12.0 Hearing/Guide or assistance animals

12.1 Incommunities may facilitate the keeping of hearing, guide or assistance animals through the provision of access to suitable areas, such as a flagged area for a kennel.

13.0 Service Standards

13.1 Incommunities service standards which apply to the service are that:

- we will consider your request for an aid or adaptation and make a decision to approve or decline the request within 60 days
- if we refuse your request for an aid or adaptation, we will provide you with a full explanation within 10 days of the decision
- we will ensure that any aid or adaptation installed in your home is fit for purpose and that you are satisfied with the service you receive from us
- Occasionally complex cases may take longer than 60 days make an approved/declined decision. This is often because factors are beyond Incommunities direct control. E.g. where a range of options need to be considered by both OT, family and Incommunities.

This may include:

- Feasibility studies: I.e. structural reports, drawing up architectural plans,
- Seeking planning and building regulation approval for extensive building works
- Considering rehousing options
- Awaiting further medical diagnosis/prognosis of the client and their future needs
- Awaiting/setting up multi disciplinary case meetings
- Identifying and agreeing funding arrangements
- Awaiting quotes from contractors

We will inform the tenant and the Occupational Therapy service in writing of any decision with regard to a customers request for works, whether approved or declined.

14.0 Prioritising cases

14.1 Cases may on occasion be ranked in order of High, Medium and Low and works are thus completed in a chronological order. Incommunities do not rank cases; this is done by Bradford Council's OTD on their referrals. However any tenant may contact Incommunities and express the opinion that their case is urgent. Should this occur, providing Incommunities have documentary evidence from a professional involved with the client, it may process out of turn to reduce the risk to the client. Legally Incommunities cannot decide as a landlord who has priority or need over another case, that is the role of the medical assessor, i.e. the OTD. If the OTD does not rank H, M, L, Incommunities will assume it is of Low need and process in the normal manner.

14.2 High status

High status will usually be considered where an OT or other specialist recommends the need for urgency on medical grounds. However in exceptional circumstances, approval can be given by the Disability Services Manager.

Where investment/modernisation works are imminent so the case must be prioritised so as to not delay the overall scheme.

Replacement of broken/damaged/worn out/dangerous items: e.g. replacement stairlifts, defective shower trays.

Works required to enable hospital (or similar) patient discharge home/to a new property.

14.3 Medium status

Standard cases, as received within the financial year.

14.4 Low status

The intention is to complete the scheme of works, but they will be included as part of a forthcoming regeneration scheme, to be completed in not less than two years from initial receipt of request at Incommunities.

15.0 Funding

15.1 Incommunities has agreed to set aside £250K per annum (agreed within the Stock Transfer Agreement) for the delivery of an aids and adaptations service. This is done in partnership with the local authority.

15.2 Incommunities has an arrangement with the local authority to consider all eligible requests for major adaptations for individual tenants up to £30,000 (equivalent to the maximum mandatory Disabled Facilities Grant) within Incommunities properties. Any request that is likely to exceed this limit should be firstly approved in principle as likely to proceed, i.e. is reasonable and practical, will meet a long term need, be economically viable, technically possible within building regulations and all attempts to provide rehousing to suitable existing adapted accommodation have been explored.

15.3 For schemes in excess of £30K, once the schedule of works is established, the case will go forward to the Home Improvements Service for a full financial test of resources to determine whether the tenant may have a contribution to make towards the cost of any

works if the works are (a) not for a child under the age of eighteen (b) it is not already proven they are in full receipt of benefits such as Universal Credit and would therefore be in full receipt of 100% Housing Benefit/Council Tax rebate or its equivalent.

- 15.4 The Director will need to consider that an expenditure of £30K as a one off against one property will have a significant effect upon their adaptations budget for that year, leading to the possibility of other works becoming delayed.
- 15.5 If the costs of the adaptation works are equal to or more than the re-sale value of the property, Incommunities may choose not to authorise their completion. Incommunities will carefully balance the appropriate expenditure of funds to adapt certain dwellings, against that properties long-term sustainability. Assistance will be given to relocate to alternative accommodation if requested.

16.0 Funding in addition to that provided by Incommunities

- 16.1 Residents who choose to fund their own adaptations will be required to:
- Obtain IC written approval to complete the works
 - Provide IC with details and drawings to allow an effective evaluation of the proposed works
 - Complete works using a qualified and competent contractor
 - Allow IC to inspect the works on completion.
 - Will sign appropriate documentation to transfer any equipment or fittings into IC ownership if they require IC to maintain the adaptation equipment or fittings.
- 16.2 In circumstances where, for reasons outside the control of the tenant, adaptations which they have wholly or partly funded are to be left in a property on their departure, the principles included in the statutory “Right to Repair” will be applied.
- 16.3 Where residents on the approved waiting list wish to fund their adaptation ahead of timescale, Incommunities will contribute one third of the total costs up to a maximum value of £3,000. In such circumstances, Incommunities will:-
- carry out the work
 - Obtain the signed agreement from the resident that to enable Incommunities to maintain the equipment/adaptation, it becomes the property of Incommunities.
- 16.4 Residents may wish to enhance the standard, quality and/or specification of aids/adaptations or equipment provided by IC. Where it is practically possible, residents may choose to upgrade the standard equipment provided by IC, subject to the following conditions:
- The upgrade must involve no increased installation or maintenance costs for Incommunities
 - The difference in cost between the standard equipment normally provided and the cost of the enhanced provision must be met by the Tenant and the sum paid to Incommunities before the installation of the equipment
 - The tenant will sign appropriate documentation confirming that the equipment is entirely owned by Incommunities.

16.5 Disabled Facility Grant (DFG) accessing/funding and protocols.

- 16.5.1 The £250K allocated PA is insufficient to fund service demand. On the 1st April each year we will commence aids/adaptations works using our internal and external contractors. Typically £150k is initially committed between April to July. By July we will forward requests for works to CBMDC for a DFG and continue to do so throughout the remaining financial year. Approximately £100k is retained to spend throughout the year to spend on ramps, lifts and other adaptations (of an urgent nature) that can have a more significant impact on a person's life if done promptly, rather than making customers await a DFG, which will typically take 5-6 months providing it's a straightforward scheme.
- 16.5.2 It is common practice in many authorities for RP's to part fund works done by DFG, e.g. contribute. The current decision in Bradford is that this practice does not take place. This is primarily to ease the demand on staff resources within the LA and has the benefit to IC tenants that a much higher percentage of works are done responsively, rather than all customers receive works through the relatively lengthy DFG process.

16.5.3 Means Testing/TOR- Test of Resources

All DFG applicants, over the age of 18 years old, are subject to a TOR to determine whether they have a financial contribution to make towards the works. We take the approach that an adaptation completed to our home is of benefit to the stock asset, therefore in most circumstances where a tenant has a financial contribution to make towards the scheme, Incommunities will make that contribution towards the works. This is paid from the £250k budget. On occasion we may choose not to make that contribution: typically this might be where a tenant has a 100% contribution to make, because their overall capital and income is so great they are deemed to be able to self fund a scheme of works. In such cases, which are rare, the Disability Services Manager will make the initial decision on access to Incommunities funding.

- 16.5.4 Representatives from CBMDC (Occupational Therapy and Home Improvements-DFG's and the Disability Service Manager) meet on a 6-8 week basis to discuss cases and ensure applications for works are being processed as required.

17.0 Void Properties, Changes of use and extensions

- 17.1 Where an adaptation has taken place and the tenancy is terminated after the work has been carried out; Incommunities will in the first instance place details on the Value Based Lettings System to ascertain if there is a household with a specific need which will lead to a 'match' based on need, time waited and types of adaptations required. This makes best use of stock; the investment made and ensures that disabled clients are considered first for adapted stock.
- 17.2 If the adaptations installed in a property be no longer required, either because the current tenant or occupant (s) no longer require them (i.e. due to an improvement in health, the disabled person moving out, or their death) Incommunities may re-convert properties by removing the adaptations, subject to the discretion of the Disability Services Manager.
- 17.3 Examples of this would include the removal of through floor lifts, stairlifts, the removal of wet -floored bathrooms/ level access shower trays and their replacement with a bath. Incommunities should seek to protect its investment in its stock and consider alternative

options, such as the re-housing of other disabled clients who could make best use of that particular tenancy.

- 17.4 Property extensions will only be considered, where no other options are available and all suitable alternative accommodation from other partner RP's in the city have been explored. RP new build is often a highly popular alternative, albeit the timescales must be factored in, if considering this as an alternative. Consideration should be given to bespoke design in the property if a family is pre-identified for such a new build home.
- 17.5 Temporary or "POD" extensions are a viable alternative to traditionally built extensions. The concept is that they can be re-located to another dwelling after use, i.e. once the disabled person is not using/occupying the extension any more.

18.0 Harassment

- 18.1 Where tenants in adapted accommodation are subject to harassment, Incommunities will do all in its power to act against the perpetrators, before considering any move. Where actions to resolve fail, Incommunities shall have the discretion to transfer and re-install adaptations to another property. This will only be done once the Director (or their representatives); Able Living and the OTD have made considerations.

19.0 Benchmarking and monitoring customer involvement/satisfaction

- 19.1 The involvement of residents and service user representatives is an essential element of a responsive adaptable and continuously improving Adaptations Service. Prior to the policy being amended in any way, we will consult with service users on their views of the service and policy to inform and effectively develop processes and procedures.
- 19.2 Customer satisfaction surveys will be issued to all clients approaching the service, whether the works are approved or declined. These will be used to measure levels of satisfaction with the service and to identify areas for improvement.
- 19.3 Incommunities is a member of the Regional Adaptations Forum (RAF), a consortium of North West based RP's. This is currently supported by the Nat Fed.
- 19.4 The current customer satisfaction form is one that all its members use and thus extremely effective benchmarking is in place as we can compare similar services. The survey has been approved by Incommunities customer involvement team.

20.0 Complaints

- 20.1 If the client disputes the works as recommended or refuses to allow access over a six month time period, Incommunities reserve the right to close the case, without having completed the works. Before this is done, reasonable effort must be demonstrated that every effort to resolve the problem has been made and final approval must be given by the Director, followed by a letter to the client.
- 20.2 Where the tenant declines alternative accommodation, consultation will be carried out between the tenant, a Director (or their representatives), the Disability Services Manager, Bradford Council's OTD, technical staff and any advocates or parties the client wishes to include. Consideration will be given to the quality, type and location of the alternative

accommodation, support given from family or carers, and disruption to schooling and employment.

20.3 Complaints from tenants regarding the provision of adaptations from Incommunities should be dealt with through Incommunities Complaints Policy.

20.4 All initial appeals should be made to the Disability Services Manager, to be considered by the appropriate Director.

21.0 Performance Monitoring

21.1 Incommunities will use performance data collated to carry out ongoing performance monitoring in relation to this policy.

21.2 A suite of measures are available to inform the development of the service. These are:

General

- Number of requests received
- Analysis by:
 - Age; Gender; Ethnicity
 - Tenure length
 - Property type
 - Type of requests received (again with further analysis)
 - Accepted Requests (again with further analysis)
 - Average length in property after adaptations undertaken
 - Average cost of accepted requests
 - Average cost per type of works
 - Type of accepted requests
 - Declined Requests (again with further analysis)
 - Average length in property after decline decision
 - Analysis of termination reasons for those where requests declined including transfer into different type of accommodation
 - Type of declined requests (against policy definition)
 - Average cost of declined works
- Number of adaptations removed on void and cost of installation
- Number of adaptations less than £1000 undertaken including cost and length of tenure

Timescales

- End to end time from the request submitted
- Time for processing by Incommunities
- Time for Occupational Therapist Visit
- Time for Referral to Local Authority
- Local Authority to works starting on site
- Contractor completing work on site (by type)

Financial

- Number of cases where Test of Resources has been applied
- Average costs of approved and decline costs against void costs
- Breakdown by:
 - Tenure length
 - Property Type
 - Type of request

Policy

- Number of Appeals
- Number Upheld/Declined
- Complaints

22.0 Implementation

22.1 The procedures that will enable the practical implementation of this policy will be made available to all staff through a training programme

23.0 Review

23.1 There will be a review of this policy whenever there is a fundamental change of legislative or regulatory provisions, or when other information becomes available that will impact on the policy, such as the outcome of a service review. Irrespective of this, there will be a bi-annual review of the policy.

24.0 Associated Documents

- Allocations Policy
- Communal Spaces Policy
- Complaint Handling Policy
- Customer Debt Policy
- Responsive Repairs and Maintenance Policy
- Voids Policy

Appendix 1

Guidelines on use and storage of mobility scooters and motorised wheelchairs within Incommunities properties and housing schemes.

The differences:

Mobility scooters – these are intended to help people with reduced mobility.

Scooters are designated in law as either Class two or Class three. Class two are smaller, lighter and designed for pavement use at up to 4 mph. They are likely to collapse and be able to be placed in the back of a vehicle for transportation. Class three maybe used on the highway and are generally quite a large “vehicle”, not capable of “collapsing” and easy storage.

They have become popular with older people who have difficulty walking or standing for long periods of time but do not necessarily think themselves disabled. A mobility scooter can be a convenient alternative to public transport or a replacement for a car for those who no longer feel confident enough to drive. There is greater use/ownership of such devices in the UK than in any other European country.

They have three or four wheels and are steered using a bicycle style handlebar which requires two hands to steer. They are meant for use outside, e.g. visit to local shops rather than for inside sheltered housing schemes or to be stored within a home.

They should be stored within a garage, scooter store or shed and not within a person’s home as they are very likely to block egress and escape in case of emergency.

Motorised wheelchairs – There are 4 basic types of powered wheelchair from user controlled to attendant controlled.

They are used by people who rely on their wheelchairs for everyday mobility, around the home as well as outdoors. It is usually the person’s only means of getting around. These usually look like a traditional wheelchair but have a battery and a motor. They are usually driven with one hand, using a ‘joystick’ control on the arm of the chair. Motorised wheelchairs can be used inside schemes/the home subject to space and would usually be stored and recharged within the tenant’s own home.

It is likely the client will use a motorised wheelchair within the home, or into a hallway area, before transferring to a manual wheelchair or other alternative.

Access to/from the client’s home (pathways, ramping etc):

Incommunities sheltered housing schemes will have Part M compliant pathways or ramped access to the principal entrance of the scheme. We are unlikely to attempt to provide additional ramping to other entrances, e.g. rear/side doors due to cost, but we will consider any requests made.

Our general needs stock (flats, houses and bungalows) is very unlikely to have pathways or ramping that is Part M compliant and suitable for wheelchair or mobility scooter use without extensive building works.

- We are unable to alter pathways, gate posts, fencing, driveways, existing ramps, door entrances, convert manual doors to powered doors or provide any form of storage or charging facilities for mobility scooters. The client must take this into consideration before they purchase such a vehicle.
- We will consider alterations to pathways, gate posts, fencing, driveways, existing ramps, door entrances and conversion of manual doors to powered doors for permanent self propelled manual wheelchair users, or permanent user or attendant controlled electric wheelchairs.

Any such works requests must be supported with a referral from Occupational Therapy. The request will be considered within our “Aids/Adaptations” policy (March 2017) and will be approved or declined accordingly.

Are there different rules for mobility scooters V motorised wheelchairs?

Yes. Mobility scooters are for outside use, on pavements and/or roads. They are not intended for inside use e.g. to get around a scheme or home. The only time we allow mobility scooters inside a sheltered housing scheme is to get to and from your flat or designated storage area.

Motorised wheelchairs are generally smaller and designed for inside use so can be used to get around a scheme.

What if the client can't manage to get from the storage area to their home ?

They should have another type of mobility aid e.g. walking sticks, wheelchair or walking frame.

What needs to happen before a client brings a mobility vehicle into sheltered housing scheme?

They must seek permission, in writing, before bringing a mobility vehicle into the scheme. This request should be sent to the Scheme Co-ordinator.

They will check if there is enough storage space in the scheme and will also discuss with the tenant about safe use before giving them a decision.

If they bring a mobility vehicle into the scheme without getting permission, they will be asked to remove it.

Where can a mobility vehicle be stored (sheltered housing schemes) ?

Generally the mobility vehicle must be stored inside the flat unless it won't fit in.

If it won't, then the mobility vehicle may be stored in a communal area but only if there is a designated safe place for mobility vehicles in the scheme and that area isn't already full up. A designated space means somewhere that Incommunities Officers have decided is safe and the mobility vehicle won't cause an obstruction. For example, a mobility vehicle store. We can discuss this with the tenant. However, we don't have stores in most of our schemes.

What if there is no storage space available?

If there is nowhere in the scheme designated as safe for mobility vehicles and the mobility vehicle won't fit into the flat then we can't allow the tenant to have a mobility vehicle in the scheme.

If we do have an area for storage but the space is already full up, then the Scheme Co-ordinator or Officers will add your name to the waiting list. Allocation of space will be on a *first come, first served* basis.

What safeguards are there for mobility vehicles stored in a communal area?

As mobility vehicles can be a fire hazard, we have safeguards in place:

- All flats have smoke detectors linked through to careline
- All flats have heat detectors linked into the fire alarm (in enclosed schemes)
- Smoke detectors have been fitted in area designated for storage
- Sockets should have been fitted in the areas for storage to avoid any trailing electrical leads as they could be a trip hazard.

What are the client's responsibilities in a sheltered housing scheme?

If they are given permission to bring a mobility vehicle into a sheltered housing scheme, then they will be required to comply with the conditions set out in these guidelines.

They must:

- Buy and use an RCD (plug) for recharging;
- Let us do an electrical check every year as part of the tests we do on all electrical appliances in communal areas;

They must:

- Take out insurance cover for the vehicles to pay for any damage they might cause to the scheme or should they injure someone;
- Follow the manufacturer's instructions about recharging, regular maintenance and safe use.
- Use the vehicle in line with the intended use and registration requirements, including speed limits.
- If they don't keep to the terms of the Agreement, then they will be asked to remove their mobility vehicle from the scheme.

Do they need to have insurance for their mobility vehicle?

Yes. We do recommend that they do take out insurance so that they have cover for any accidents and if they cause injury to anyone or cause damage to property. If they don't, then you will be personally liable to pay compensation or the cost of any claims.

As a minimum, we would suggest third party cover, to cover them for injury or damage. Additional levels of cover would include the theft or damage to the vehicles and personal injury. However, the decision whether to have insurance is up to the client.

Do we recharge the client for recharging of a vehicle from an electrical socket in a communal space in a sheltered housing scheme ?

No – the amount of electricity used for recharging is very small. We don't think it is necessary to charge. However we might look at this in the future if we feel that it is necessary.

Does the user need to register with DVLA?

They need to register and license your vehicles, if it:

- Exceeds a speed of 4mph (but not capable of exceeding speed of 8mph)
- Is intended for use on the road or highway
- Supports a weight not exceeding 150kgs

If the above apply, then it is classed as a Class 3 Invalid carriage and must be registered with DVLA.

Some information about safe use

Mobility vehicles can pose a hazard to pedestrians, especially for people with mobility problems. They are expected to be capable of driving their mobility vehicle in a safe manner and are fully conversant with the controls and it is used with consideration for others. They should not be driven whilst under the influence of any non prescribed drugs or alcohol.

For their own safety, they need to make sure they only use the mobility vehicle in line with the limitations set by the manufacturer and be aware of common hazards e.g.

- if designed to be used on level indoor surfaces only then it will not have the strength, stability and performance for outdoor use
- hitting the kerb or steps can cause jolting and this can lead to tipping over or sliding. This can also cause you to slide or fall forwards out of the seat.
- Soft ground – as wheels can sink in and tip the vehicle so wherever possible, keep to hard paved surfaces.
- Adding a cushion raises the centre of gravity of the vehicle and reduces stability
- Attaching things like shopping bags, ventilators or oxygen cylinders can imbalance the vehicles. This may not cause problems on a level surface but it can make it unstable when going up a slope or ramp.

Where can the client get more information about mobility vehicles?

Contact details for Useful Organisations

British Healthcare Trades Association:

'Get Wise' leaflets - Get wise to buying a mobility vehicle, Get wise to using electric scooters and wheelchairs, Get wise – get more from your battery, Get wise – how to make sure your wheelchair remains stable.

British Healthcare Trades Association.

Email: bhta@bhta.com or web: www.bhta.com

Disabled Living Foundation

Factsheets – 'Choosing a scooter or buggy' and 'Choosing a powered wheelchair'.

Provides free, impartial advice about all types of disability products and disabled equipment for older and disabled people, their carers and families.

Email: info@dlf.org.uk or download from web: www.dlf.org.uk or
Tel: 0300 999 0004

Disabled Persons Transport Advisory Committee (DPTAC)

Door to Door Travel Guide for Disabled People – information on all types of travel for the disabled and less mobile.

Web: www.gov.uk/government/organisation/disabled-persons-transport-advisory-committee

Event Mobility

Hire of mobility scooters at outdoor events such as Flower Shows, Golf Championships etc.

Web: www.eventmobility.org.uk

Driving Mobility

Some centres offer assessment and advice on choosing a wheelchair or scooter. Also advice on loading and transporting wheelchair/scooter.

Web: www.drivingmobility.co.uk

Motability:

Leaflet -The Motability powered wheelchair and scooter scheme: Your complete guide.

Scheme enables disabled people to use their government-funded mobility allowances to obtain a new car, powered wheelchair or scooter.

Tel: 0300 456 4566 or web: www.motability.co.uk

National Federation of Shopmobility UK (NFSUK)

Shopmobility schemes lend manual and powered wheelchairs and scooters to those people who need them to shop and use other facilities in town centres. Contact your local Shopmobility to find out whether they can accept a scooter that is no longer needed – it will need to be in good condition. There are Shopmobility schemes throughout the UK.

Tel: 0844 4141850 or web: www.shopmobility.org.uk

RADAR:

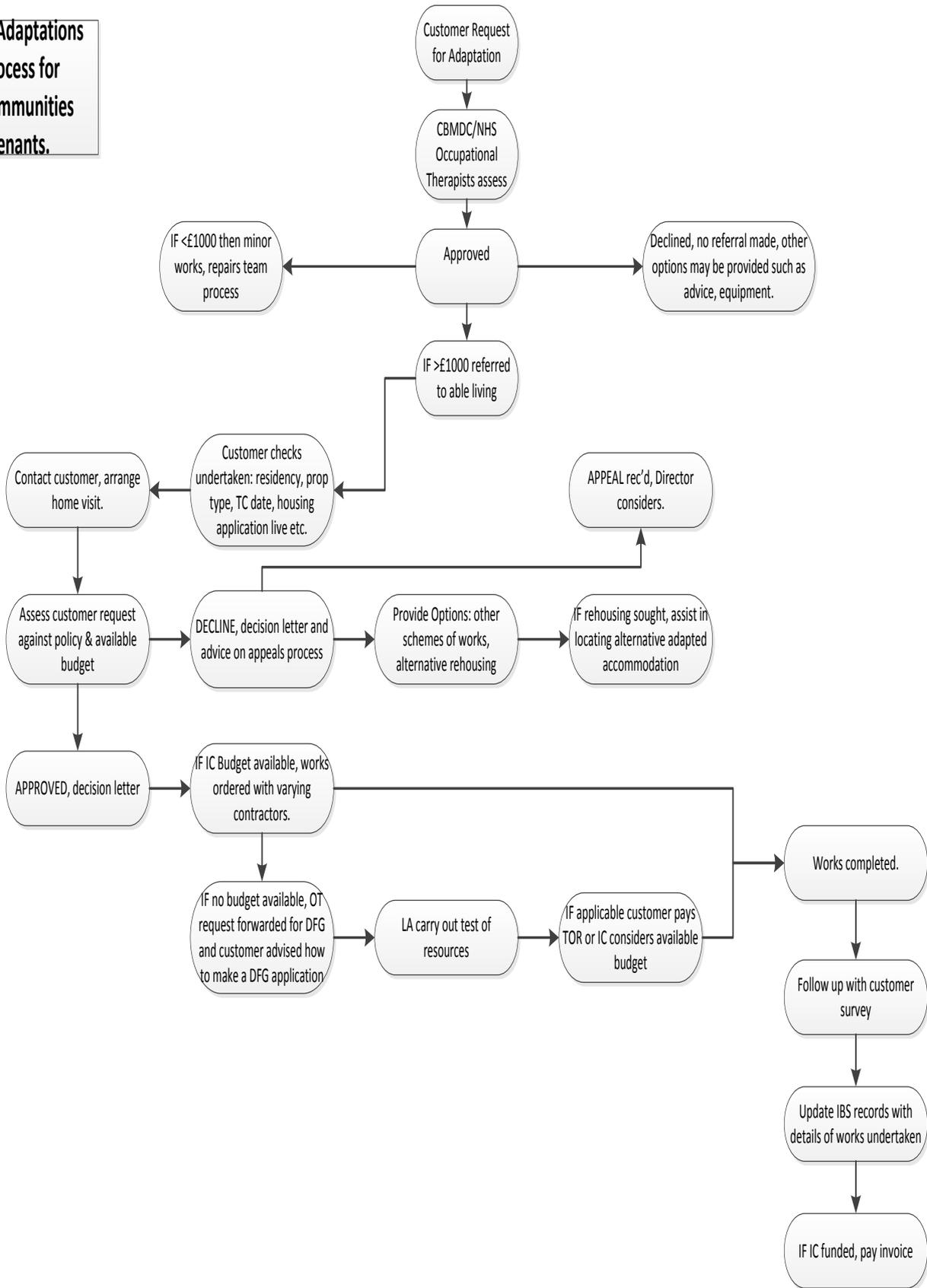
Leaflet - Get Mobile - Your guide to buying a scooter or powered wheelchair.

Royal Association of Disability and Rehabilitation (RADAR) run by disabled people.

Tel: 020 7250 8181 or web: www.radar.org.uk

Appendix 2

Aids/Adaptations process for Incommunities tenants.



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