



First Priority Housing Association Aids & Adaptations Policy

Scope	The policy applies to all of First Priority Housing Association's tenants
Policy relates to	Tenancy Policy Allocations & Lettings Policy
Version	3.0
Release Date	1 April 2024
Responsible Officer	Chief Executive Officer
Review Frequency	No more than 3 years
Review Date	1 April 2027

1. Purpose

- 1.1. The Adaptations Policy describes how First Priority Housing Association (FPHA) manages requests for adaptations from tenants. The policy describes how FPHA does this in a clear, consistent and transparent manner.

2. Introduction and Aims

- 2.1. First Priority Housing Association (FPHA) provides supported housing and intensive housing management services to tenants with complex needs. FPHA recognises that many of its tenants are vulnerable and has developed this Adaptations policy specifically in that context.
- 2.2. The need for an adaptation may arise on the basis that a tenant needs a reasonable adjustment to their home to continue to live in their home. This requirement is reflected in disability discrimination and equalities legislation.
- 2.3. At all times, FPHA will work with other agencies, including local authorities and social services, to support tenants who require adaptations to their homes.
- 2.4. The policy aims to:
 - 2.4.1. Ensure FPHA is considerate and reasonable in response to adaptations requests;
 - 2.4.2. Support tenants to access the full range of help that is available to them;
 - 2.4.3. Recognise that FPHA does not own the properties it lets to tenants and does not enjoy full rights to make adaptations to properties;
 - 2.4.4. Set out the criteria by which FPHA will assess all requests;
 - 2.4.5. Balance the needs and expectations of tenants with FPHA's duty to manage its property portfolio effectively (especially as a lease-based provider). This includes the allocation of properties to new tenants;
 - 2.4.6. **Ensure compliance with legal and regulatory requirements and adopt best practice guidance where it is prudent to do so.**

3. Legislation and Regulation

- 3.1. The policy has been drafted in line with the principles of 'Home Adaptations for Disabled People: A detailed guide to related legislation, guidance and good practice.' <https://www.cieh.org/media/1249/home-adaptations-for-disabled-people-good-practice-guide.pdf> and the '*Minor Adaptations without Delay: A Practical Guide & Technical Specifications for Housing Associations*', College of Occupational Therapists (2006).
- 3.2. Key legislative authorities for this policy are:

- (a) the Disability Discrimination Act (2007)
- (b) Care Act (2014)
- (c) Chronically Sick & Disabled Persons Act (1970)
- (d) Social Housing (Regulation) Act (2023)
- (e) Human Rights Act (1998)
- (f) Equalities Act (2010)

- 3.3. This Policy is compliant with the Homes Standard published by the Regulator of Social Housing, in particular, the requirement in part 2.2.2 to co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.
- 3.4. This Policy supports FPHA's compliance with the Regulator for Social Housing's Consumer Standards which reference the need for clear communication

4. Approach

- 4.1. Adaptations requests will only be considered on receipt of an assessment from an Occupational Therapist. Where it is believed by FPHA, by tenants or by their advocates that an adaptation could be necessary, FPHA will support the tenant to make a referral to the Occupational Therapy service.
- 4.2. FPHA tenants are amongst the most vulnerable in the country and their vulnerability is given due consideration when they are referred to FPHA for housing. Allocations of properties will be made in all cases where the property is most suitable to the tenant to minimise the need to carry out subsequent adaptations to the property. In line with the Allocations and Lettings Policy, FPHA may decline to accept a referral where the property is not suitable for a tenant's needs.
- 4.3. **Minor adaptations** - FPHA is committed to making reasonable adjustments to properties where they are recommended by an occupational therapist. FPHA will fund minor adaptations up to the total value of £1000. Minor adaptations must not impact the fabric of the building or need a major elemental renewal. Examples of these minor adaptations include:

- (a) Lever Taps;
- (b) Grab rails;
- (c) Half Step;
- (d) Mopstick Rails;

(e) Adjustments to door handles/ window latches

4.3.1. The list above is not exhaustive; FPHA will review and assess each request on an individual basis.

4.4. Major adaptations

4.4.1. Where occupational therapists recommend adaptations of a more major nature or where the cost of the adaptations would exceed £1,000, FPHA will support the tenant and their advocates and care operators to make an application to the local authority for a Disabled Facilities Grant to fund the works. Each local authority will operate its own application process and may assign Disabled Facilities Grant funding in different ways.

4.4.2. FPHA does not own the properties that it rents to tenants and cannot agree to substantial changes that will affect the structure, value or permanent condition of the property without the consent of the landlord. Landlords are not obliged to provide consent to any substantial changes to the property.

4.4.3. In the first instance, where recommended adaptations might require substantial changes to the property, FPHA will engage with the tenant and their advocates to identify whether a move to an alternative property would provide a more suitable solution.

4.4.4. Major adaptations include items such as:

- (a) Extensions
- (b) Level access showers
- (c) Wet rooms
- (d) Modular ramps
- (e) Garden adaptations
- (f) Stair lifts/ through floor lifts
- (g) Closomat toilets
- (h) Specialist baths
- (i) Other specialist adaptations including: soundproofing, specialist flooring, light fitting adjustments, kitchen fittings, widening of pathways for wheelchair access

4.4.5. FPHA will seek landlord consent to substantial changes to property where it is agreed by FPHA and the tenant, acting reasonably, that undertaking the adaptations is the best outcome for the tenant. Such adaptations need to be supported by a recommendation from an occupational therapist.

5. Maintenance, Repairs and Service Charges

5.1. FPHA will maintain and service all equipment and adaptations covered by this Policy which have been installed by FPHA or through the DFG scheme.

5.2. On occasions FPHA will need to charge for this through a service charge.

- 5.3. FPHA will also replace such equipment at the end of its useful life subject to confirmation of a continuing requirement and availability of further funding. This may require the tenant to reapply for DFG funding if this is how the adaptation/ equipment was originally financed.

6. Equality, Diversity, and Inclusion

- 6.1. All requirements for adaptations are managed in accordance with this policy, which has been designed to provide assistance and support to vulnerable people. Any allegation that a request for an adaptation has been treated unfairly on the basis that the applicant is a member of a protected group (defined by the Equalities Act 2010) will be investigated, with the board addressing any matters upheld from that investigation.
- 6.2. An Equality Impact Assessment has been undertaken and can be found within Section 8 of this Policy.
- 6.3. FPHA is committed to supporting our tenants to live happily in our homes. The vulnerability of our tenants is such that our referrals process seeks to identify any aids and adaptations required at the beginning of their tenancy. We will consider each request on its merits and within the parameters of our model as a lease-based organisation.
- 6.4. Where aids and adaptations are not possible or feasible, we will apply reasonable endeavours to support the tenant alongside the respective local authority to source alternative accommodation either through FPHA or elsewhere.
- 6.5. FPHA completes monthly check in calls with all tenants and Care Providers, as well as conduct quarterly visits to the property. The Intensive Housing Management service we deliver allows for us to continually monitor the needs of the tenant against the property to ensure that this is still fit for purpose. Our Assured Shorthold Tenancies also provide an opportunity annually for further review and continued commitment from the respective local authority.

7. Monitoring and Reporting

- 7.1. The following records shall be maintained for each adaptation: type of work, cost, location, date of work. The costs of adaptations incurred during the year will be captured under “[Name]” line in management accounts. Reporting regarding adaptations shall be on request of the board, or internal audit.

8. Equality Impact Assessment

Protected characteristic		Explanation (if required)	Controls
Is it likely that the policy could have a positive or negative impact on minority ethnic groups? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative	N		

<p>impact due to gender (including pregnancy and maternity)? What evidence (either presumed or otherwise) do you have for this?</p>			
<p>Is it likely that the policy could have a positive or negative impact due to disability? What evidence (either presumed or otherwise) do you have for this?</p>	<p>Y</p>	<p>Our tenants by their nature are some of the most vulnerable in society.</p> <p>As a result, there can often be the need for aids and adaptations to be sought for properties in order to make the viable.</p> <p>Tenant needs can also change over time leading to new and emerging aids or adaptations that can support the tenant to a better quality of life.</p>	<p>This Policy outlines the support that FPHA can provide to tenants who require aids and adaptations.</p> <p>The referral process for tenants robustly assesses tenant requirements at the beginning of their tenancy when checking their eligibility against the proposed property. If this is found to not be suitable, FPHA will liaise with the respective local authority.</p> <p>Expectations will be managed throughout with our lease-based structure being clearly defined to local authorities and Care Providers upon applying for a FPHA tenancy.</p> <p>In the event that a new requirement for aids and adaptations to a property cannot be fulfilled and as such the tenant cannot continue their tenancy, FPHA will act in accordance with its Tenancy Policy supporting the tenant to source alternative accommodation where possible and engage with the respective local authority and other advocates on behalf of the tenant.</p>

Is it likely that the policy could have a positive or negative impact on people due to sexual orientation? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative impact on people due to their age? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative impact on people due to their religious belief (or none)? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative impact on people with dependants/caring responsibilities? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative impact on people due to them being transgender or transsexual? What evidence (either presumed or otherwise) do you have for this?	N		
Is it likely that the policy could have a positive or negative impact on people due to their marital or civil partnership status? What evidence (either presumed or otherwise) do you have for this?	N		

8.1.