



City of London Corporation
Department of Community & Children's Services
Housing Service

Aids and Adaptation Policy

Approved by:	<i>Housing Management & Almshouses Sub-Committee</i>
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Re-Approval Date	-
Next Review Date	-

1. Purpose

This policy outlines our approach to the management of requests for aids and adaptations recommended by an Occupational Therapist (OT) for tenants or members of their household to restore or enable independent living for tenants and their families who may reside within a disabling environment.

This policy also aims to ensure we meet our statutory and legislative obligations.

Most of this policy clarifies legislative requirements however it does include local agreements developed to meet the needs of vulnerable people living on our Housing Estates and provide a more responsive service.

2. Scope

This policy applies to:

- Tenants living in properties owned or managed as part of the Housing Revenue Account (HRA)
- Licensees living in properties managed by the Housing Service on behalf of the City of London Almshouses Trust and the Gresham Almshouses Trust
- Communal facilities such as car parks, commercial premises, and community rooms

Leaseholders requiring adaptations to their homes can check funding eligibility, find out more information, seek support and advice online by checking with the relevant Local Authority or online at <https://wwwFOUNDATIONS.uk.com/how-we-help/adapt-my-home/>

An overview of the Disabled Facilities Grant (DFG) can be found in Section 4.8.

3. Legislation

- Equality Act 2010
- Housing Grants, Construction and Regeneration Act 1996
- The Housing Renewal Grants Regulations 1996
- The Housing Renewal Grants (Services and Charges) Order 1996
- The Disabled Facilities Grants and Home Repair Assistance (Maximum Amounts) (Amendment No. 2) (England) Order 2001
- The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
- The Disabled Facilities Grants (Maximum Amounts and Additional Purposes) (England) Order 2008
- The Housing Renewal Grants (Prescribed Form and Particulars) (Revocation) (England) Regulations 2010

4. Policy Statement

4.1 Requesting Aids and Adaptations

The purpose of providing aids or adapting council housing stock is to restore or enable independent living for tenants and their families who may reside within a disabling environment. A 'one-size fits all approach' is not adopted in delivering

adaptations and where proportionate works are tailored to meet individual needs and requirements.

A request for aids and adaptations can be made to Occupational Therapists (OT). A request for an adaptation may originate with the disabled person themselves or their carer/s or may arise as part of treatment or care during involvement with other social, health or housing services. OT services are provided by the local authority and can be found in Appendix 1.

4.2 Assessments

Assessments usually take place in the person's own home. The process involves not only questions and answers but can also include observation of the performance of daily living tasks. This is so that the Occupational Therapist can complete a full functional assessment.

This is necessary to understand the impact the difficulties have on the person's life and determine the level of risk to the person or their carer. An assessment may involve several visits to the person's home, in less complex situations an assessment may be completed in one visit.

There can be a variety of outcomes from an OT visit. Options to address the need include:

- Wait for existing suitable alternative accommodation to become available
- Wait for alternative accommodation that can be more practically adapted
- Adapt tenant's current dwelling/communal area

This policy focuses on where the outcome requires adaptation to an individual's home.

4.3 Criteria

All requests for adaptation works must be assessed by an Occupational Therapist (OT) who will provide recommendations and specifications as necessary, including highlighting any high priority cases.

During this assessment the OT may request assistance from Property Services, Housing Management or the Planning Department to assess the suitability of the property for adaption.

Within this policy, adaptations are categorised as either minor or major adaptations.

Minor Adaptations

Minor adaptations include alteration to a property that involves secure or permanent attachment to, or alteration of, the fabric of the property usually up to the value of £1,000. Some typical examples of works that would fit within the scope of a minor adaptation are:

- Grab rail
- Alterations to position of light switches/sockets
- Widening doors for wheelchair access

As long as the minor adaptation is necessary and practical to undertake, there is no cost to the tenant.

Major Adaptations

Major adaptations are usually a significant and permanent alteration to the property. As a guideline this covers adaptations over £1,000. Some typical examples of works that would fit within the scope of a major adaptation are:

- Level access shower
- Stair-lift
- Ramp

Major adaptations costing may be subject to a test of resources, to determine if the work will be fully funded or whether the tenant has to contribute. Housing Management will liaise with the tenant to establish an agreed payment profile for their contribution.

The test of resources only considers the resources (income and savings) of the disabled occupant and / or their spouse or partner where applicable and where practicable. It does not consider outgoings.

If the work is for a child or to a communal area or the tenant is in receipt of Universal Credit or other applicable benefits, then no means test is required.

Most tenants will want the council to organise the major adaptation works and take ownership. Property Services will organise the works using the appropriate contractors, keeping the resident updated of timescales to complete the work as appropriate.

4.4 Disabled Adaptations Panel

The panel varies depending on where the estate is based. Often the panel includes the Assistant Director of Housing and appropriate Heads of Service from the Housing Service with appropriate representation from the Occupational Therapy service and Housing Needs. The panel will be informed and meet as required when there is the potential:

- Adaptations are likely to exceed £30,000.
- Adaptations include a proposed extension to a property.
- The housing register does not meet the needs of occupants requiring adaptations.
- Complex or high priority cases, where support or advice or additional resources or better use of the stock is identified where collective agreement is needed.

The panel must make fair, realistic financially sound documented decisions regarding adaptations to properties in the Housing Revenue Account (HRA) that it has been informed about to decide if any adaptations should proceed or not.

If works are agreed to proceed the panel will sign off the design, drawings and specification before works proceed.

The panel will hear any appeal by a resident regarding a decision to adapt a property or not, make decisions regarding any operational disagreement between Occupational Therapists, Housing Management and Building Surveyors or other

interested parties regarding adaptation of a property.

4.5 Eligibility

An individual is eligible for an adaptation if it is deemed 'necessary and appropriate' as well as 'practicable and reasonable'.

A person is considered disabled if:

- Their sight, hearing, or speech is substantially impaired
- They have a mental disorder or impairment of any kind
- They are physically and substantially disabled by illness or impairment present at birth or otherwise
- For those aged 18 or over, disability is recognised if:
 - They are registered under section 29(1) of the National Assistance Act 1948
 - Arrangements have been made or might be made for their welfare under that section

For those under 18, disability is recognised if:

- They are registered in a register of disabled children under the Children Act 1989
- Social Services considers them a disabled child under Part III of the Children Act 1989

The Council supports only essential adaptations due to the applicant's disability. Adaptations for social problems or overcrowding will not be considered.

Necessary & Appropriate

To determine if proposed works are necessary and appropriate, the Housing Service will collaborate with Occupational Therapists from the City for properties in the Square Mile, and other local authorities where an estate is based in another borough. The Occupational Therapist will visit and assess the individual's needs. We will accept the work recommended in the Occupational Therapy referral if it is deemed necessary and appropriate to meet the individual's needs

Reasonable and Practicable

We must ensure as per government guidance that it is reasonable and practicable to approve an adaptation having regard to the age, condition or suitability of properties, for example:

- Where the moving of any existing services would be prohibitively expensive
- Where the property is a listed building and the proposed adaptation would be prohibitively expensive or inappropriate
- Where the adaptation work would have a detrimental effect on other residents

4.6 Ordering of Works & Timescales

The government sets out guidelines for timescales for delivering a home adaptation. This is broken down into 5 key stages:

Stage 0: first contact with services

Stage 1: first contact to assessment and identification of the relevant works;

Stage 2: identification of the relevant works to submission of the formal grant application

Stage 3: grant application to grant approval

Stage 4: approval of grant to completion of works.

The timescales for moving through these stages will depend upon the urgency and complexity of the adaptations required. More urgent cases should be prioritised for action, but larger and more complex schemes will take longer to complete. The following table sets out best practice targets, which should be met in 95% of cases.

Target timescales (working days)

Type	Stage 1	Stage 2	Stage 3	Stage 4	Total
Urgent & Simple	5	25	5	20	55
Non-urgent & Simple	20	50	20	40	130
Urgent & Complex	20	45	5	60	130
Non-urgent & Complex	35	55	20	80	180

4.7 Taking ownership

The tenant can organise the works themselves and maintain ownership on completion. Where a tenant wishes to organise the works themselves, the Alterations procedure will apply.

4.8 Funding Adaptations & DFG Explained

The Disabled Facilities Grant (DFG) framework and mandatory aspect of the grant applies across all tenures, but the DFG budget cannot be used for funding adaptations to tenanted properties.

Adaptations for tenants will be paid from the Housing Revenue Account. The cost of multiple and expensive adaptations should be considered carefully to ensure budgets are used to achieve maximum benefit and ensure value for money is achieved.

The provision of this assistance is mandated by the government. The maximum amount available for an adaptation is £30,000. The grant is subject to a means test which will consider the income and capital of the disabled person and their spouse or partner. The applicant's assessed financial contribution (if any) will be deducted from the approved grant.

To qualify for assistance an applicant should be the:

- Property owner-occupier, registered provider social landlord, tenant, private landlord on behalf of tenant;
- A disabled member of the household who needs the home to be adapted to meet their needs is living in the property and the works will enable them to continue living there.

- Anyone of any age, who has a disability, (registered or not), and who lives in private housing.

Where the application is for a disabled child or young person under the age of 19 a means test is not required.

The law sets out the purposes for which a grant must be approved and covers works to remove or help overcome any obstacles which prevent the disabled person from moving freely into or around their home or enjoying the use of the property and the facilities or amenities within it. Eligible works include:

- widening doors and installing ramps, providing or improving access to rooms and facilities; for example, by installing a stairlift or providing a downstairs bathroom,
- improving or providing a heating system suitable to the needs of the disabled person, adapting heating or lighting controls to make them easier to use
- improving access to and movement around the home, to enable the disabled person to care for another person who lives in the property, such as a spouse, child, or other person for whom the disabled person cares and improving access to and from the garden where feasible.
- facilitating the preparation and cooking of food by the disabled person,
- Dementia-related aids and adaptation equipment and alterations like improving lighting, providing soundproofing, changing the flooring, and tonal contrasting tiling and sensors.

Social services will be asked to consider what is necessary and appropriate to meet the disabled person's needs. This will usually take the form of a recommendation from an Occupational Therapist.

The proposed works must be necessary and appropriate to meet the disabled person's needs and be reasonable and practicable depending on the age and condition of the property. The Council needs to be satisfied with each of these matters. A DFG may be refused if the council believes that the proposed works are not reasonable and practicable.

Where the cost of eligible works is more than the grant limit, other assistance may be available to bridge some or all of the gap between what the applicant receives by way of DFG and the full cost of the works.

Clients have the option of managing the works themselves or choose to use the council's Home Improvement Agency (HIA).

Where the client wishes to have the Council's HIA manage the works on their behalf, there may be additional fees applied. Please check with the relevant Council's website.

4.9 Re-housing

We work in partnership with other housing providers to make the most effective use of properties across London. Re-housing could be considered more appropriate than carrying out major adaptations in a person's current property in the following circumstances:

Current home has design features that do not make adaptation a feasible option and it is therefore considered not 'reasonable and practicable'.

Current home requires extensive adaptations that are not reasonable or practicable
Appropriate accommodation can be provided that would remove the need for extensive adaptations

Major adaptations would not meet the long-term assessed needs of the person and their carer / family

Consideration will be given to the individual's needs, including those of their carer, family and local support network. Appropriate support for vulnerable tenants will be provided in cases where re-housing is the preferred option.

When re-housing is recommended, tenants will be automatically assigned a named advisor who will work with them to complete an application form, award the relevant priority under the terms of the Housing Allocations Scheme and find suitable accommodation.

We will follow the Housing Allocations Scheme to ensure tenants are awarded the relevant priority and identify suitable alternative accommodation.

4.10 The Right to Reviews, Appeals & Complaints

There is no automatic right of appeal or review associated with decisions made under the terms of this policy. This does not remove a tenant's right to make independent legal challenge if they feel legislation has been breached or complain if they feel we have not followed the terms of this policy in making the decision.

If a complaint is upheld, then the application must be reconsidered by panel and a fresh decision given. This reassessment may not result in a changed decision but ensures that the policy has been applied fully.

If a complaint is not upheld and at any point during the process, the tenant has the right to refer their concerns to the Housing Ombudsman.

We will only assess a re-submission of an application for the same adaptation and applicant if a significant change in circumstances can be proven.

5. Training

To ensure the effective implementation of the Aids and Adaptations Policy, all relevant staff members will receive comprehensive training covering areas such as equality, safeguarding, understanding vulnerabilities and communication.

6. Monitoring and Review

We will regularly monitor the implementation of the policy to ensure that it is being applied consistently and effectively across all relevant services.

Key performance indicators (KPIs) will be established to measure the success of the policy, including the number of adaptations completed, the time taken to process applications, and resident satisfaction levels.

7. Related documents

- Safeguarding Policy
- Equalities and Diversity Policy
- Complaints Policy
- Reasonable Adjustments Policy
- Allocations & Lettings Policy
- Repairs & Maintenance Policy
- Customer Service Standards

8. Equalities

This Policy has been subject to a full Equalities Analysis and will be implemented in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010.

9. Data Protection


We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely.

It is policy that all employees are responsible for managing information in accordance with the Data Protection Policy and implement appropriate practices, measures, controls and training to ensure compliance.

10. Exceptions

We may make an exception to the approach outlined in this policy if the circumstances require it and it is reasonable to do so. Our reasoning can be provided to the affected parties on request.

11. Document Management

Department of Community & Children's Services Housing Service	 <p>The logo of the City of London, featuring a shield with a red cross on a white background, flanked by two lions. Above the shield is a crown. Below the shield, the motto 'DIEBIS ET DOMINE DIRIGE NOS' is written in a banner. Underneath the banner, the words 'CITY OF LONDON' are printed in a bold, sans-serif font.</p>
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Appendix 1 - OT Services

City of London Corporation - <https://www.cityoflondon.gov.uk/services/social-care-for-adults/support-with-living-at-home-occupational-therapy>

Golden Lane Estate

Middlesex Street Estate
Spitalfields

Hackney - <https://hackney.gov.uk/occupational-therapy>

Windsor House

Islington -

<https://findyour.islington.gov.uk/kb5/islington/directory/service.page?id=mBZLqICvbWY>

Holloway Estate
Isleden House
York Way Estate

Lambeth - <https://www.lambeth.gov.uk/adult-social-care-and-health/adults-and-older-people/living-home/equipment-technology>

City of London Almshouses and Gresham
William Blake Estate

Southwark - <https://www.southwark.gov.uk/adult-social-care/living-independently/equipment-adaptations-and-assistive-technology/get>

Avondale Square Estate
Horace Jones House
Southwark Estates

Lewisham - <https://lewisham.gov.uk/organizations/occupational-therapy-service>

Sydenham Hill

Tower Hamlets -

https://www.towerhamlets.gov.uk/lgnl/health_social_care/Health-and-adult-social-care/ASC/Occupational-Therapy/Occupational-therapy-assessment.aspx

Dron House