



**COUNCIL HOUSING
DISABLED ADAPTATIONS POLICY**

29 OCTOBER 2025

Policy: COUNCIL HOUSING DISABLED ADAPTATIONS POLICY

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Links to Council Corporate Plan 2025-28

Council ambition	Linked?
Working for a prosperous future <i>The Council wants to ensure the best possible local economy, with opportunities for its residents to succeed and achieve</i>	Yes
Healthier, safer communities <i>Residents should feel safe in the Borough and supported to be more active in order to improve their health and wellbeing</i>	Yes
A greener and cleaner environment <i>It's important to everyone to look after the environment</i>	No
Restoring the Council to good health <i>The Council will be placed on a sound financial footing and ensure resilience – delivering the service its residents deserve and expect</i>	Yes
We ♥ Castle Point <i>The Council will help create and maintain the best possible place to live in, work in and visit</i>	Yes

Lead Officer responsible for owning the Policy and internal approval body (meeting / board where the Policy is approved for adoption or approved for referral to PFH or Committee for adoption)

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Approved by: IAN BUTT, DIRECTOR - PLACE AND COMMUNITIES

Lead Member and Committee responsible for approving Policy:

Name: COUNCILLOR ROB LILLIS, PORTFOLIO HOLDER FOR HEALTH, WELLBEING AND HOUSING

Equality Impact Assessment undertaken? Yes

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1. Introduction

- 1.1 As a responsible social housing landlord, Castle Point Borough Council ("the Council") is committed to keeping safe the people that live in the homes it owns and manages. The purpose of this document is to describe how the Council manages its legal and statutory obligations in relation to the aids and adaptations in its general needs homes, and the homes and communal areas for sheltered housing schemes. The Policy demonstrates how the Council follows current legislation and approved codes of practice.
- 1.2 The purpose of this Policy is to support those tenants who hold a tenancy with the Council, or permanent members of their household, to remain independent in their home with daily activities, where they may require some practical help due to long-term health issues or disability. If this is not possible, the Neighbourhood Management Team will support the tenant in applying to the Transfer Register to look for suitable alternative accommodation, in accordance with the Allocations Policy.

2. Scope

- 2.1 This Policy specifically refers to disabled adaptations to properties managed by the Council for secure tenants of the Council, including communal areas which should be compliant with the *Disability Discrimination Act, 1995, 2005* (DDA). This Policy does not extend to homeowners, leaseholders or tenants applying for adaptations to private sector or other social rented properties; such assistance is available through Disabled Facilities Grants (DFG).
- 2.2 Under the terms of this Policy, a person is regarded as being disabled if they have a physical, sensory or mental impairment, which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities within their home. A long-term effect refers to disabilities that have lasted for at least 12 months or where the effects will last for at least 12 months, or which are likely to last for the remainder of a person's life.

3. Definitions

Freestanding aids	Are normally provided by Adult Social Care or the NHS Trust and include items that are delivered and ready to use, such as toilet frames, shower chairs, vibration mats.
The Council	Castle Point Borough Council
DDA	Disability Discrimination Act 1995, 2005
DFG	Disabled Facilities Grant
Disability	A disability is defined under the Equality Act 2010 as a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.
Long term health issues	Conditions that last for a year or more, and cannot be cured, that require ongoing treatment and medication.
Major adaptations	Are significant modifications to the home like stairlifts, level access showers, widened doorways.
Minor adaptations	Are small non-structural modifications such as grab rails, lever taps, raised toilet seats – typically low cost and quick to install.

Mutual exchange	The process whereby social housing tenants agree to swap their homes, with the consent of their respective landlords.
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4. Aims and Objectives of the Policy

- 4.1 The aim of this Policy is to outline the Council's commitment to providing housing that best meets the long-term needs of its tenants and permanent members of their households to ensure their safety, wellbeing and quality of life. The Council will do this by fulfilling its legal obligations and duty of care to ensure its legal and regulatory requirements in respect of aids and adaptations are met.
- 4.2 This Policy reinforces the Council's commitment to its tenants, in providing a customer-focused disabled adaptations service. The Council aims to provide a fair and equitable service for all tenants, within its financial constraints.
- 4.3 The Council is committed to keeping up-to-date information about its Council housing so it knows what properties are accessible for disabled residents and means that the Council will make the best use of its homes.

5. Policy Statement

- 5.1 This Policy sets out the Council's approach when it receives a request from one of its tenants for an adaptation to be installed within one of the homes it owns.
- 5.2 This Policy supports the Council's commitment to equality, diversity and inclusion.
- 5.3 The Council will endeavour to support all Council tenants who require support to remain in their home and not restrict reasonable adjustment support to just those tenants who are defined as disabled based on the definition provided by the Equality Act 2010.
- 5.4 The Neighbourhood Management Officer (NMO) will support tenants to make a referral to Occupational Therapy Services and liaise with the Housing Surveyor to see if there is anything the Council can do to support the tenant while they are waiting for the Occupational Therapist (OT) assessment. Where a tenant self refers, the Council requests that Essex County Council Social Care lets it know that a referral has been received and that details of the self-referral are passed to the Council. The NMO can then visit the tenant and complete a health and safety and welfare visit.
- 5.5 Following completion of an assessment and scope of works by an OT, the Housing Management Service will carry out a desktop assessment before any adaptations can be approved.
- 5.6 The Council will assess all instructions from an OT to understand how those adaptations should be delivered. Where adaptations works are budgeted to cost less than £1,000 the Council will use its contractors and they will undertake the instructed works in a timely way, where it is reasonable and practical to do so, and where budget permits. The Council aims to carry out such adaptations (known as minor adaptations) within 28 working days from when it issues the work to the contractor.
- 5.7 Where adaptations works are budgeted to cost between £1,000 and £8,000, these will be assessed based on their nature to ensure efficient processing and alignment with existing programmes. Level access showers and kitchen adaptation requests are internally referred to Asset Management, where they are incorporated into the capital work programme for bathroom and kitchen replacements. Capital work contractors, alongside Occupational Therapists, conduct inspections to define the scope of works required. Other major adaptation requests falling outside the capital work programme are subject to a feasibility

inspection conducted by a surveyor. If deemed viable, quotations are obtained, and a works order is raised in the IT system.

- 5.8 Where adaptations works are budgeted to exceed £8,000 they will be considered by the Council's Housing Service Disabled Adaptations Panel. Where a particular adaptation is not feasible to undertake for the property, the Council will refer to and work with the OT, the resident, and others to explore suitable, alternative options. This may include reviewing the adaptation or supporting a transfer to alternative accommodation. In the meantime, the NMO will support the tenant and make sure they are safe in their home.
- 5.9 The Council will issue all adaptations works over £1000, including those approved by the Panel, (known as major adaptations) to its contractors and they will undertake the work in a timely way. The Council will aim to complete its major adaptations within 3 months from the date they are approved by the Panel.

6. Legislation, Regulation and Guidance

- 6.1 The Council is committed to ensuring that tenants' homes and communal areas remain safe and fit for purpose. In achieving this, the Council complies with relevant legislation and regulations, see paragraph 6.6 below.
- 6.2 The Equality Act 2010 sets out the duty to make reasonable adjustments. The Act states that *"is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid"*.
- 6.3 The work of this service must meet the requirements of the 'Regulator of Social Housing (the Regulator) Consumer Standards, 2024' specifically the 'Safety and Quality Standard, 2024' which sets out the expectations of the Regulator in relation to Adaptations:
- a) 'registered providers should have a process in place to assist tenants in need of housing adaptations, which they must communicate to tenants. As part of this communication, registered providers are expected to inform tenants about the application process.
 - b) where the registered provider provides a housing adaptations service, they should not unreasonably refuse a tenant's request for a housing adaptation.
 - c) when a registered provider does not meet a tenant's request for a housing adaptation, the registered provider should consider whether it is appropriate to offer alternative measures in order to support the affected tenant, for example, offering to transfer them to a home that is accessible or that can be adapted to meet their needs.
- 6.4 The Disabled Adaptations Service must also meet the requirements of the Transparency, Influence and Accountability Standard, 2024 which sets out the expectations of the Regulator in relation to fairness and respect and diverse needs.
- 6.5 The Regulator states that registered providers must use relevant information and data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs and the Council must ensure that it treats tenants and prospective tenants with fairness and respect.
- 6.6 The following list sets out the key legislation, regulation and guidance:
- Disability Discrimination Act 1995 and 2005
 - Equality Act 2010

- The Care Act 2014
- Fire Safety Act 2021
- Building Safety Act 2022
- Regulator of Social Housing – Safety and Quality Standard 2024

7. Minor Adaptations

- 7.1 Typically minor adaptations are works which cost less than £1,000. Examples of minor adaptations include:
- a) grab rails
 - b) handrails
 - c) steps
 - d) small ramps
 - e) flashing doorbells
 - f) painting doorframes a different colour
- 7.2 Freestanding aids are normally provided by Adult Social Care or the NHS healthcare trust and can include, for example:
- a) manual hoists
 - b) toilet frames
 - c) bed levers
 - d) shower chairs
 - e) vibration mats

8. Major Adaptations

- 8.1 Major adaptations are works that cost over £1,000 (except for some large pieces of re-sited equipment such as through floor lifts) and usually involve structural alterations to the property.
- 8.2 Major adaptations follow the criteria of the Construction and Regeneration Act 1996 for DFGs and are to help facilitate:
- a) access to and from the home;
 - b) making the dwelling or building safe for the disabled occupant and other persons residing with them;
 - c) access to a room used or usable as the principal family room;
 - d) access to, or providing for the disabled occupant, a room for sleeping;
 - e) access to, or providing for the disabled occupant, a room(s) in which there is a lavatory, a shower and/or bath, a wash hand basin, or facilitating the use of such facilities by the disabled occupant;
 - f) the preparation and cooking of food by the disabled occupant;
 - g) the use by the disabled occupant of a source of power, light or heat by altering the position of one or more means of access to or control of that source or by providing additional means of control;
 - h) access and movement by the disabled occupant around the dwelling in order to enable them to care for a person who is normally resident in the dwelling and is in need of such care; and
 - i) facilitating access to and from a garden by a disabled occupant.
- 8.3 Examples of major adaptations include:
- a) level access showers

- b) large ramps
 - c) door widening
 - d) stair lifts
 - e) through floor lifts
 - f) mechanical hoists
 - g) adjustable height kitchens
- 8.4 The Council will only consider a request for disabled adaptations if the person with a disability is the tenant, their partner or a member of the immediate family, and is permanently resident in the household. This will be substantiated through a residency check. No age restrictions apply. Where the property is under-occupied, the Council will consider if a transfer to a smaller property is more appropriate. The Council does not want to create situations for tenants where they end up in an adapted property on a third floor, unable to leave their home. This affects the welfare of tenants and therefore thoughtful consideration will be given to adaptations.
- 8.5 An assessment of needs, by an OT, must be undertaken for all major adaptations, which identifies any necessary and appropriate adaptations to meet the needs of the person with a disability.
- 8.6 If a resident feels that they may require an adaptation to their home, they may contact their NMO. Similarly, during routine visits a NMO may identify the need for minor adaptations.
- 8.7 Where necessary, the NMO will complete a Person-Centred Fire Risk Assessment (PCFRA) and update the Council's digital records with any vulnerabilities so that the Council has up-to-date records and can update the tenant information in the Property Information Box (PIB).
- 8.8 The NMO will refer the resident to an OT for an assessment, where relevant. If adaptations are recommended, then this follows the route for either minor or major adaptations, as appropriate.
- 8.9 All major adaptations over £8,000 will be considered by the Council's Housing Service Disabled Adaptations Panel. The Council must be satisfied that the recommended works are:
- a) necessary and appropriate to meet the needs and prognosis of the occupant with a disability, having regard for end-of-life care protocols;
 - b) reasonable and practicable with regard to the type, age and condition of the home. For example, the Council would not normally provide a level access shower to a first floor flat unless there was lift access to the first floor. The Council may also consider the wider impact of the requested adaptation in relation to issues such as the makeup of the household, tenancy, regular visitors to the property and under-occupancy levels; and
 - c) Able to be met by the Council's financial commitment.
- 8.10 Requests for major adaptations will not be approved where a right-to-buy application has been received. Tenants in these cases will be signposted to the assistance available through the Council's DFG programme once they have purchased their Council home.

9. Letting Adapted Homes

- 9.1 Adapted properties that become available will be offered to those with matching needs or similar needs.

- 9.2 If a person requiring adaptations applies to join the Housing Register, they may, after being assessed by an Occupational Therapist, be granted priority banding for any suitable adapted properties. Please see Council Housing Disabled Adaptations Procedure for full details.
- 9.3 If a tenant no longer requires adaptations and would prefer to move from an adapted property to an un-adapted home, the Council will assist the tenant go on the Transfer Register, or with a mutual exchange, particularly if it has someone else who needs that type of adapted home.

10. Managing Risk

- 10.1 The Council will make sure any tenant moving into an already adapted home is referred to an Occupational Therapist who will assess the new home's suitability.
- 10.2 The Council will make sure all disabled adaptations with an electrical and/or mechanical element are added to its servicing contracts. This will ensure the equipment is maintained and remains safe to use.

11. Tenant Responsibilities

- 11.1 Tenants are responsible for contacting the Council and requesting adaptations to their home. Tenants are required to provide access to an Occupational Therapist who will assess the need for the disabled adaptations and provide a specification for the Council.
- 11.2 The Council will encourage tenants, through the provision of publicity information, to allow access to carry out any necessary safety checks associated with the disabled adaptations, namely lifting equipment that will require at least annual inspections in their home. It is the tenant's responsibility to provide access to their home to enable the Council to fulfil its duties and carry out the inspections and any remediation work. The Council will use the legal remedies available within the terms of the tenancy agreement should any tenant refuse access.
- 11.3 It is the tenant's responsibility to report any concerns to the Council regarding any lifting equipment that has been installed to their home. Tenants must only allow those people in the household for whom any lifting equipment has been installed, to use the lifting equipment.
- 11.4 The tenant is responsible for any service charges or any additional rental charges that may be applied following any significant disabled adaptations that affect the value of the home.

12. The Council's Responsibilities

- 12.1 It is the Council's responsibility to keep the homes it owns safe and free from health hazards. The Interim Head of Housing Technical Services will appoint suitably qualified persons to oversee the implementation of this Policy.
- 12.2 The Council has a legal duty to share its Asbestos Register with its contractors. They are required to refer to the Council's Asbestos Register before they carry out any disabled adaptations to the Council's homes. For more details, please refer to the Council Housing Asbestos Policy.
- 12.3 The Council will check that its contractors hold the relevant qualifications and accreditations when procured, and thereafter on an annual basis. The Council will evidence these checks and each contractor's certification appropriately, along with verifying that contractors' employers' liability, public liability and professional indemnity insurances are up to date on

an annual basis. All evidence will be stored in the contract file, for the duration of the contract.

- 12.4 The Council will make sure any lifting equipment that is installed as part of the adaptation to the home is added to the service contract for lifts and that regular inspections take place. For more details, please refer to the Council Housing Lift Safety Policy.

13. Contractor Responsibilities

- 13.1 The Council has a responsibility to ensure that contractors are competent.
- 13.2 Contractors and others working in Council owned properties are required to produce a method statement for the adaptation, and this must be approved by the Council before any work starts. Contractors are required to immediately report any risks or concerns to their manager and the Council's Housing Compliance Manager and to stop ongoing works if the concern is significant or warrants immediate action. The contractor undertakes work in accordance with the specific requirements set out in the contract and follows any installation guidance from the manufacturer.
- 13.3 The contractors will provide evidence to the Council that the operatives who work on the Council's contract hold the relevant qualifications and accreditations at the contract mobilisation stage, and thereafter on an annual basis.
- 13.4 The contractors will provide evidence to the Council, prior to contracting and as part of managing the contract, that they have the appropriate insurance in place as specified in the terms and conditions of the contract.

14. Monitoring and Continual Improvement

- 14.1 For monitoring purposes, all applicants for disabled adaptations will be asked to provide details of their gender, age, religion, disability, ethnicity, marital status and sexual orientation in line with the protected characteristics identified within the Equality Act 2010.
- 14.2 The Council will monitor this Policy in a number of ways. This includes reports and analysis of requests made, spend against budget and value for money savings.
- 14.3 Performance will be reported internally on a monthly basis to the Housing Management Team. The position reported will be based on the following criteria:
- % of health and safety and welfare visits carried out within 5 working days by the Neighbourhood Management Officer (NMO)
 - Requests for adaptations
 - The number of referrals made to Occupational Therapists
 - The types of adaptations undertaken
 - The cost of adaptations / % of budget spend year to date (YTD)
 - The average time taken for adaptations from application to completion.
- 14.4 The Council will also ask for feedback from stakeholders to help it improve the service.
- 14.5 Audits and reviews provide data reflecting the effectiveness of this Policy and identify opportunities to achieve continual improvement in the management of disabled adaptations at the Council. The Council will commission an independent audit of disabled adaptations at least once every five years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues. An action plan will be developed for any issues identified during the audit, with appropriate timescales agreed for corrective

actions to be carried out. Other checks and reviews may be undertaken periodically, as required.

15. Data and Records

- 15.1 The Council will maintain a core asset register of all properties it owns or manages, with component/attribute data against each property to show any health and safety and inspection requirements.
- 15.2 The Council will operate a robust process to manage all changes to stock, including property acquisitions and disposals, to ensure that properties are not omitted from the servicing contract and the stock data regarding adaptations remains up to date.
- 15.3 The Council will maintain accurate records, in the appropriate corporate system, against each property it owns and/or manages, of the following:
- Inspection dates of any hoists or lifting equipment
 - LOLER inspection certificates
- The Council will store the safety check records in a dedicated compliance system.
- 15.4 The Council will keep all records and data in line with its Document Retention Policy and will have robust processes and controls in place to maintain appropriate levels of security for all disabled adaptations related data, including how it will share sensitive information with its contractors.

16. Equality, Diversity and Inclusion

- 16.1 The safety of the Council's tenants, leaseholders and Council employees is of the utmost importance. This Policy has been written to protect all concerned, considering all protected characteristics, as set out in the Equality Act 2010.
- 16.2 The Council will ensure that relevant information is communicated in an accessible and understandable way with the aim of keeping people safe.
- 16.3 This Policy has been designed to be fully inclusive, regardless of protected characteristics and an Equality Impact Assessment (EQIA) has been carried out to inform this Policy. The EQIA determined there is no negative impact specific to those with protected characteristics. See Appendix A.

17. Communication

- 17.1 Once the Policy is approved, a summary document "a policy on a page" will be placed on the Council's website with a link to the full Policy. An approved version of this Policy will be published internally and accessible to Council employees.
- 17.2 The Council will also aim to successfully engage with vulnerable and hard to reach tenants. The Council will share information clearly and transparently and will ensure that information is available to tenants via regular publications and information on its website.

18. Review of Policy

- 18.1 This Policy will be reviewed every two years, unless new legislation, good practice or a relevant major incident means it needs to be reviewed sooner.
- 18.2 The Council reserves the right to change this Policy in order to meet changes in regulation, legislation and good housing management practice. All changes will be subject to an Equality Impact Assessment. Where the change is considered to be minor it will be

approved by the Interim Director of Housing. If the change is major, approval will be required from the Portfolio Holder for Health, Wellbeing and Housing.

19. Consultation

- 19.1 The Council is committed to meaningful tenant and leaseholder engagement. This Policy has not yet involved tenant or leaseholder consultation.
- 19.2 The Council intends to consult with tenants and leaseholders on this Policy, once its structure for tenant engagement is in place following the work it is doing with the Tenant Participation Advisory Service (Tpas).

20. Training

- 20.1 The Council will maintain a skills/training matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.
- 20.2 The Council will operate a detailed competency framework.
- 20.3 The Council will deliver training on this Policy and the procedures that support it, including team briefings; basic disabled adaptations awareness training; and more detailed training for those delivering the disabled adaptations service and repairs works as part of their daily job to ensure that all Council employees understand their responsibilities for disabled adaptations.
- 20.4 Training records will be maintained for all courses attended.

21. Significant Non-Compliance and Escalation

- 21.1 The Council's definition of significant non-compliance is any incident which has the potential to result in a breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred or of a Council employee being made aware.
- 21.2 Any non-compliance issue identified at an operational level will be formally reported to the Housing Compliance Manager in the first instance, who will agree an appropriate course of corrective action with the Interim Director of Housing and Interim Head of Housing Technical Services. The Interim Director of Housing will report details of the same to a member of the Senior Leadership Team which includes the Chief Executive, Director - Corporate and Customer, Director - Commercial and Assets and Director - Place and Communities, Assistant Director - Legal & Democratic Services and Monitoring Officer and Assistant Director - Finance & Procurement and Section 151 Officer.
- 21.3 In cases of serious non-compliance the Chief Executive will notify the Leader, Deputy Leader and the Portfolio Holder for Health, Wellbeing and Housing.
- 21.4 In cases of serious non-compliance, the Chief Executive will consider whether it is necessary to disclose the issue to the Regulator of Social Housing, as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

22. Governance

- 22.1 The Council has overall responsibility for ensuring that this Policy is implemented to ensure compliance with the law.

- 22.2 The Chief Executive reports to Cabinet to demonstrate accountability for corporate health and safety across the Council and is accountable for ensuring that health and safety compliance management duties in its landlord function are properly controlled and managed to keep its tenants safe. Under Section 26 of the Constitution (the Officer Scheme of Delegation) the Chief Executive is authorised to delegate duties to the Directors who are then responsible to take decisions for the effective sub delegation of duties within their service areas of responsibility, this to ensure the Council's statutory duties and functions are effectively discharged.
- 22.3 The day-to-day responsibility for managing disabled adaptations for the Council's housing is implemented in line with this Policy is delegated, via the Chief Executive, to the Director - Place and Communities. The Disabled Adaptations Procedure also identifies the roles and responsibilities of those who will undertake the day-to-day tasks on behalf of the Director - Place and Communities.
- 22.4 The Director - Place and Communities has delegated their duty holder responsibility to the Interim Head of Housing Technical Services who has professional and technical responsibility for the homes and communal areas the Council owns.

23. Associated Policies and Procedures

Castle Point Borough Council Allocations Policy
Castle Point Borough Council Health and Safety Policy
Council Housing Access Policy & Procedure
Council Housing Disabled Adaptations Procedure
Council Housing Electrical Safety Procedure
Council Housing Fire Safety Policy & Procedure
Council Housing Maintenance and Repairs Policy
Council Housing Estate Management Policy
Council Housing Repairs Policy
Council Housing Mobility Scooter Policy
Council Housing Electric Vehicles Policy

24. Appendix

Equality Impact Assessment for Disabled Adaptations

