



Accessible Housing Policy; Housing Solutions for Disabled People

A Policy Framework to
ensure Cornwall delivers best
practice when delivering housing
solutions for disabled adults,
young people & Children

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Summary

1. The policy
 - i. Aims to ensure that disabled adults, young people and children can access the help they need to promote independence and social inclusion within the home environment.
 - ii. Reflects best practice and identifies opportunities to: offer greater choice of housing solutions as alternatives to major adaptations, deliver timely housing solutions, secure best value, and make better use of/ increase the supply of adapted/accessible properties.
 - iii. Sets out a decision-making process which ensures solutions are best value.
 - iv. Focuses on early stage interventions prior to consideration of eligibility for disabled facilities grant (DFG) and guidance to staff to assist in the decision-making process.
 - v. Advocates the use of a range of professionals for the assessment of adaptations and aligns with the recommendations in the new guidance 'Adaptations without Delay¹'.
2. The Council will be subject to legal and reputational risks if it does not comply with its statutory duties under the Care Act 2014, the Chronically Sick and Disabled Persons Act 1970 and Housing Grants Construction & Regeneration Act 1996 (HGCR Act) for the provision of adaptations to meet the assessed needs of a disabled person.
3. The benefits for disabled customers include: equitable access to services, consistent decision making & service delivery irrespective of tenure, facilitating the allocation of homes via Homechoice to those in need of an accessible/adapted home, increased opportunity for tenants within the private rented sector to secure landlord approval for adaptations, provision of funding to meet all needs both physical disabilities and learning disabilities and timely adaptation.
4. The Policy has been supported by Cornwall Housing Ltd (CHL), Registered Providers (RPs) in Cornwall and the following Council services: Planning & Enterprise, Older People & Adults with Physical Disabilities and Disabled Children & Therapy Services.
5. The Policy aligns with the Council's corporate objectives. The preventative work provided by this Policy is very much in line with the principles set out in a range of policy documents including: The Council's Strategy, the Council's Housing Strategy 'Homes Where

People Can Thrive' and the Council's Sustainability and Transformation Plan 'Shaping Our Futures'.

Distribution – Cornwall Housing Ltd, Registered Housing Providers in Cornwall, Adult Social Care Directorate, Disabled Children & Therapy Service, Disability Cornwall, Cornwall Residential Landlords Association, Tremorvah Industries, Key partners & stakeholders.

¹ RCOT ISBN 978-1-905944-88-0

1. Background

Cornwall Council recognises the essential role home adaptations and accessible housing play in supporting disabled adults, children & young people to meet needs and reduce dependency:

*“The difference this has made to me is fantastic. To be able to use the toilet by myself (well - I am sure you can imagine) and to sit in the shower and get in with no help - it’s no exaggeration to say this has changed my life. Thank- you all for everything”
(Cornwall Home Solutions customer satisfaction feedback March 2018).*

- 1.1. Adapting Cornwall’s current housing stock is a key priority for the Housing Service. There is rising demand for accessible & adaptable homes as people live for longer and increasing numbers of children and adults live with multiple long-term health conditions or experience reductions in mobility. Most older people and disabled people live and will continue to live in existing housing, rather than new build. It is, therefore, important to make the best use of existing housing stock in all tenures and types, both mainstream and specialist, and to invest in adaptations where necessary.
- 1.2. Cornwall Home Solutions (CHS) adopted a Housing Solutions Policy 2016 -2019 setting out how the Council provides housing solutions for disabled adults, young people & children living in the private sector (includes home owners and tenants of private landlords or Registered Providers). Cornwall Housing Limited (CHL) adopted a Disabled Adaptations Policy (DAP) in 2012 setting out its approach to delivery of adaptations to meet the needs of Cornwall Council tenants. Both Policies are now in need of a review providing an opportunity to adopt one Policy across all tenures in Cornwall. This Policy builds on existing practice and improves on service provision by ensuring that service users have an efficient, equitable service with a wider scope of assistance.
- 1.3. Delivery arrangements for major adaptations² are provided by either CHS or CHL with funding either from the Disabled Facilities Grant (DFG) or Housing Revenue Account (HRA) respectively, see Table 1. A few Registered Providers (RPs) contribute towards the cost of adaptation works costing more than £1,000, however most adaptations in this sector are funded from the DFG.

² Major adaptations are adaptations & modification to the home environment that costs over £1,000.00

Table 1; Current arrangements for funding and delivering major housing adaptations

	Tenant of a private rented landlord	Owner-occupier	Tenant of CHL (formerly Local Authority tenant)	Tenant of Housing Association/Registered Provider
Funding Source	DFG Or individual tenant/landlord	DFG Or individual owner	HRA	DFG Or Landlord use of own resources
Level of Funding	Means Tested up to 100%. Maximum DFG of £30K	Means Tested up to 100%. Maximum DFG of £30K	100% No means test.	Means Tested up to 100%. Maximum DFG of £30K
Service Provider	CHS	CHS	CHL	CHS

- 1.4. This Policy enhances the existing arrangements for CHS & CHL through the adoption of common: standards, decision making process, key performance indicators and a standardised format for monitoring delivery and evaluating customer feedback. It is accepted that there will be different processes adopted however the outcomes for service users should be equitable.
- 1.5. The Better Care Fund (BCF) provides most of the funding for major adaptations. This Policy provides a wider scope of assistance to support discharge from hospital and prevent admission to hospital, which are key health priorities. The Policy also responds to the prevention agenda by advocating use of Trusted Assessors & a range of Health professionals to deliver timely assessment of need.

2. Objectives

This Policy aims to deliver person centred services in a timely way, reducing waiting times for major adaptations, reduce delayed discharge from hospital or care homes and through adaptations improve effectiveness of reablement.

- 2.1. A review of Disabled Facilities Grant and other services was undertaken in 2018 and the report proposes:

*“...a fresh approach that is all-encompassing and creates a home environment that enables disabled people to live a full life. Districts and counties, housing and social care, occupational therapists and grants officers will need to work together to establish person-centred services that meet a disabled person’s needs in a more preventative, holistic and timely way”.*³

- 2.2 In response to the findings of the review the Policy has six clear objectives:

- i. **To ensure access to services is equitable irrespective of tenure.** Currently service provision is via either CHS or CHL depending on tenure. There are separate policies and different funding streams depending on whether you’re a Cornwall Council tenant or not. The current policies offer different level of service provision and different standards. This Policy will replace the existing policies, and deliver equitable outcomes irrespective of budget or whether the service provider is CHS or CHL.
- ii. **To ensure that the support and financial assistance offered meets the needs of all disabilities and dementia.** Historically the focus has been on meeting the needs of those with physical disabilities with most major adaptations addressing mobility issues. This Policy acknowledges the opportunity to make use of the Disabled Facilities Grant and discretionary assistance to meet the needs of those with learning disabilities and dementia.

Making adaptations to the home environment can help someone with dementia to continue to do things for themselves for longer and to stay independent. Adaptations can offer family and carers the reassurance of the person’s safety and security. Major adaptations for dementia can include ramps, door widening for wheelchairs, installing specially designed shower and toilet

³ DFG review 2018 [dfg-review-2018-main-report-final-nov-2018a.pdf](https://foundations.uk.com/dfg-review-2018-main-report-final-nov-2018a.pdf) (foundations.uk.com)

- facilities, or changing the design of the home to make it more dementia friendly such as safety flooring and extra lighting.
- iii. **To make best use of the powers under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) to offer a greater range of services and financial assistance.** The BCF guidance encourages use of DFG to fund discretionary work- to note in particular: *“Since 2008-09, the scope for how DFG funding can be used has been widened to support any LA expenditure incurred under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO). This enables authorities to use specific DFG funding for wider purposes”.*
 - iv. **To deliver timely solutions by making best use of professional workforce for assessment of need.** The Policy responds to the prevention agenda by advocating use of Trusted Assessors & Health professionals, to add to the capacity of the Therapy Teams within Adult Social Care and support timely assessment of need.
 - v. **To make best use of existing general needs stock & adapted/accessible accommodation and to increase delivery of wheelchair accommodation.** Due to the shortage of accessible homes in Cornwall it’s vital that the allocation of adapted stock is to those most in need. It’s also vital to facilitate the allocation of general needs stock to disabled people where it can be adapted to better meets needs. This Policy will help deliver on this objective by making provision for DFG funding of adaptations to void stock. The uncertainty regarding funding of adaptations has been a barrier to the allocation of homes to disabled applicants on the Homechoice Register. This Policy will also support use of the DFG to fund provision of wheelchair adaptable and wheelchair accessible homes both within existing housing stock via extensions and to new stock as part of the Council’s Housing Development programme (HDP).
 - vi. **To support and facilitate collaborative partnerships with Health, Social Care and Registered Housing Providers (RPs).** RPs in Cornwall signed a Memorandum of Understanding (MoU) (Appendix 1) with the Council and Health and in it they have committed to: (i) promote the adaptation of existing homes (ii) promote the building of new accessible housing (iii) ensuring that properties which have been extensively adapted are allocated to people who need them (iv) that adaptations are not removed without good reason; and (v) ensuring that, if adaptations are removed, where possible they are recycled in another property. Registered Providers are key partners in the delivery of adaptations and the implementation of this policy.

- 2.3 The Policy aligns with the **Council's corporate objectives**. The preventative work provided by this Policy is very much in line with the principles set out in a range of policy documents including: The Council's Strategy, the Council's Housing Strategy 'Homes Where People Can Thrive' and the Council's Sustainability and Transformation Plan 'Shaping Our Futures'. See Appendix 2 for further details

3. **Scope**

This Policy sets out Cornwall Council's financial assistance to support delivery of housing solutions for disabled adults, children & young people with disabilities living in Cornwall to: adapt, repair & improve their properties or to relocate to a new property that better meets their needs.

- 3.1. The policy sets out how CHS, CHL, Therapy teams in both Adults and Childrens' Services and RP's will collaborate to deliver on its objectives.
- 3.2. The Policy applies to all older people i.e. people aged over 60 and people of all ages with disabilities residing in Cornwall. The Policy applies across Cornwall and covers all tenures i.e. owner occupiers, private rented accommodation and social rented accommodation.
- 3.3. The Policy has been supported by CHL, RPs in Cornwall and the following Council services: Planning, Adults and Disabled Children & Therapy Services.
- 3.4. CHS will provide services to home owners or tenants of private landlords or Registered Providers. CHL will provide such services to their tenants.
- 3.5. This Policy will be implemented in accordance with the *Data Protection Act* and *Freedom of Information Act*. This Policy is also informed by 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). In addition, National guidance (*Safeguarding Disabled Children – Practice Guidance* (2009) and *Working Together to Safeguard Children A guide to inter-agency work safeguard & promotes the welfare of children* (2010)) also informs practice in respect of our duty to safeguard and promote the welfare of children and young people.

4. Policy Issues

4.1 Statutory Duties

There are two distinct legal duties on local authorities to provide support for home adaptations for disabled people – one owed by social services authorities and the other owed by the housing authority. Cornwall Council is responsible for the delivery of both housing and social services functions. These duties are summarised below

- 4.1.1 The Chronically Sick and Disabled Persons Act 1970 places a duty to assist disabled children and young people *‘in arranging for the carrying out of any works of adaptation in [their home] or the provision of any additional facilities designed to secure [their] greater safety, comfort or convenience’* (Section 2). This duty arises where the authority has assessed the need for the specific adaptations.
- 4.1.2 The duty on social services authorities to provide adaptations to disabled adults is provided for in the Care Act 2014. Statutory guidance states: *“Local authorities must provide or arrange services, resources or facilities that maximise independence for those already with such needs, for example, interventions such as rehabilitation/reablement services, e.g. community equipment services and adaptations”*⁴.
- 4.1.3 Housing authorities are under a statutory duty to provide Disabled Facilities Grant (DFG) to disabled people for a range of adaptations to their homes in accordance with the Housing Grants Construction & Regeneration Act 1996 (HGCR Act). This grant is available for home owners, private sector tenants and Housing Association tenants. Adaptations within Cornwall Council stock are funded from rental income through the Housing Revenue Account (HRA).
- 4.1.4 The duty requires a Housing authority to establish that the adaptations are necessary and appropriate to meet the needs of the disabled person. This may be dependent upon a social service Occupational Therapist (OT) or a trained Assessor assessing this to be the case; please refer to para 4.5.
- 4.1.5 The Housing authority must also be satisfied that the works are reasonable and practicable. This is determined by CHS or in relation to adaptations funded via the HRA, CHL. The duty requires that

⁴ Department of Health. Care and Support Statutory Guidance: issued under the Care Act 2014, para 4.3

application decisions should be made within six months of receipt and, once approved; payment must be made within 12 months. These timescales will apply to both DFG and HRA funded work. Appendix 3 sets out guidance in relation to the terms 'necessary & appropriate' and 'reasonable & practicable'.

- 4.1.6 The RRO confers upon local authorities a power to improve living conditions and enables an authority to offer a range of measures including the adaptation and provision of alternative living accommodation. This can be in any form, (e.g. grant, loan or equity release). 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.
- 4.1.7 This Policy makes use of the RRO to offer a wider range of services and financial assistance. The range of financial assistance is set out in Appendix 4. The availability of all discretionary assistance is subject to the availability of enough levels of both internal and external funding (including the HRA). All discretionary assistance is at the Councils discretion and will be removed once available funds are exhausted. Mandatory assistance will always take priority over discretionary assistance. Where demand is high for mandatory assistance CHS and CHL can decide not to offer any funding towards discretionary work.

4.2 Principles

Regard will be had to government guidance and best practice when interpreting legislation and making decisions regarding provision of services.

- 4.2.1 The customer and where appropriate parent(s) and carer(s) will be involved in the decision-making process to ensure an inclusive and sustainable solution. Where the person has a learning disability, support will be provided to ensure equal human rights, independent living, control and inclusion. In certain circumstances specialist colleagues and specialist organisations will be engaged in the process, for example for people with sensory impairment, people with learning difficulties, people with deteriorating illness and people with mental health needs.
- 4.2.2 The customer will be encouraged to secure an independent solution via the provision of advice and support.

- 4.2.3 A range of assistance to support choice in securing a sustainable long-term housing solution will be explored. The Council has exercised its powers under Article 3 of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO) to provide discretionary assistance (for details on range of assistance see Appendix 4).
- 4.2.4 The recommended solution will be best value. A more expensive solution will not be deemed necessary if a lower cost solution that fully satisfies the present or anticipated needs is available. CHS and CHL will, in the first instance, look to meet needs through provision of equipment and minor adaptations.
- 4.2.5 Where a DFG/HRA adaptation is to be provided, adaptations that can be recycled such as straight stair lifts and ramping will be considered in the first instance to offer value for money. However, each case will be considered on its merits.
- 4.2.6 The Council has exercised its powers under the RRO to make use of Service Level Agreements, Frameworks & Contracts for the supply of goods & services including stairlifts, assistive technology, ramping and bathrooms. Funded via the DFG these arrangements will offer customers an accelerated service at best value.
- 4.2.7 CHS /CHL have an obligation to deliver adaptations that are required to the extent that they are necessary to achieve any of the purposes set out in Section 23 (1) of the Housing Grants Construction & Regeneration Act 1996 (HGCR Act). If a recommended solution achieves the purpose then CHS/CHL has met its statutory duty, there is no obligation to achieve more than the purpose. Officers will distinguish between what are desirable and aspirational needs and what is needed and for which support is fully justified. The implications of this choice, in terms of financial assistance and/or risk to health and safety, will be fully explained to the customer and confirmed in writing.
- 4.2.8 Partners, such as Cornwall Housing Limited (CHL) and Registered Providers (RPs), will adopt a proactive response and work with customers to plan for their future needs. Co-operation and effective engagement amongst partners will ensure that adaptations offer value for money or suitable housing can be identified and/or planned for and transfers/exchanges managed appropriately.

4.2.9 Most DFG/HRA funded adaptations will only be available to the 'main' residence of the disabled person. This Policy allows discretion when considering multiple applications to adapt homes of disabled children to ensure service is equally available to all. Examples include: a disabled child/young person with separated parents who divide their time between their parents' homes and disabled children who spend more than half of their time at residential schools and colleges but who wish to return to a family home during the holidays. The support may include:

- i. Practical advice
- ii. Equipment/aids that are portable/flexible in use (e.g. stair climber)
- iii. Recyclable adaptations such as stairlift & modular ramping
- iv. Facilitating access to charitable funds/commercial loans
- v. Assistance from the Council via a loan

4.2.10 Costs associated with any necessary furniture storage where required to facilitate adaptation work will also be relevant works.

4.3 Adaptations

4.3.1 Adaptations are modifications to the home environment and are split into two categories – minor and major. These distinctions are based on the nature of the work. It is understood that both minor and major adaptation work can impact significantly on an individual's quality of life.

4.3.2 **Minor adaptations** (typically under £1,000) are works of adaptation that are small in nature such as the provision of handrails, grab rails and lever taps. The Council provides minor adaptations free of charge under the Community Care (Delayed Discharges etc.) Act 2003.

4.3.3 Cornwall Council doesn't charge for a service consisting of the provision of disability equipment and adaptations costing £1,000 or less that assist with nursing at home or aid daily living. There is a wide range of disability equipment including:

- i. Hygiene maintenance: grab rail, bath board, electric bath lift, lever tap extension, wheeled shower chair/commode
- ii. Toileting: raised toilet seat, toilet frame, grab rail and commode
- iii. Food preparation: adapted kitchen utensils
- iv. Beds: bed raisers to increase height, bed rails, devices to help you sit up, slide sheets to help you move position with assistance

- v. chairs: riser/recliner chair and chair raisers
- vi. Pressure care: various pressure relieving cushions
- vii. Transfers: mobile electric hoist with various slings and slide sheets
- viii. Mobility: standing/turning frame for use with assistance and various walking frames with or without wheels
- ix. Access: portable wheelchair ramp.

4.3.4 CHL and most Registered Providers in Cornwall provide dedicated adaptation services for their tenants and fund some small adaptations. Examples of the type of work provided and funded by CHL and RPs can be found on their websites

- i. Cornwall Housing Ltd, <https://www.cornwallhousing.org.uk/residents-area/repairs-and-maintenance/planned-maintenance/adapting-your-home/>
- ii. Coastline Housing, http://www.coastlinehousing.co.uk/sites/coastlinehousing.co.uk/files/documents/11_1062_CoastlineAdapt_New.pdf
- iii. Ocean Housing, <https://www.oceanhousing.com/home-2/your-community/your-neighbourhood/keeping-safe/home-aids-adaptations/>
- iv. Livewest Housing, <https://www.livewest.co.uk/my-home/aids-and-adaptations>

4.3.5 Some people may choose to self-fund and the Handyperson Service can offer support with installation of small adaptations. Small adaptations costing less than £1,000 will not be funded from the DFG budget.

4.3.6 **Major adaptations (over £1,000)** require more extensive work and complex work. Examples include the following: stairlifts, level access showers, through floor lifts, kitchen conversions, access alterations and extensions. Major adaptations should only be considered if there is an identified need which cannot be met by equipment or a minor adaptation.

4.4 **Identifying need for adaptations – referral procedures**

Most adaptation work will only be carried out following an assessment by an Occupational Therapist (OT) or appropriately trained Assessor; see para 4.5. Adults will be advised to contact the Access Team. If the adaptation is required for a child, they will be advised to contact the Multi Agency Referral Unit (MARU). Both the Access team and the MARU may take several actions including:

ordering minor equipment, signposting to other agencies/services such as physiotherapy or wheelchair services or referring onto the Therapy team for allocation to an Occupational Therapist (OT).

- 4.4.1 There can be a high demand for the service so both Adults and Childrens' services prioritise referrals according to urgency of need and risk of potential harm.
- 4.4.2 All referrals from the Access team (adult cases) are triaged and prioritised as either urgent or routine by a Senior Occupational Therapist. Urgent referrals are those where there is an unmanaged risk which could cause injury or harm to the person or their carer. Priority will be given to those with rapidly deteriorating conditions. The target for urgent referrals is to be assessed within 28 working days of referral and for routine referrals the target is to be assessed within 90 working days of referral. Both urgent and routine will be seen in date order.
- 4.4.3 All referrals from the MARU (Children's cases) are triaged and prioritised as either Emergency, 1, 2 or 3.
- Emergency –allocated immediately
- 1 – allocated within one week of referral
- 2 – allocated within 3 months of referral
- 3 – allocated within 6 months of referral
- 4.4.4 This Policy supports referrals from several services including, professionally trained officers, private OT's, Hospital OT's and Health Colleagues.

4.5 Assessments

- 4.5.1 An assessment is usually carried out in the home by an occupational therapist (OT), an Occupational Therapy Assistant (OTA) or Trusted Assessor (TA) (referred to as Assessor). The Assessor will consider whether there is a need for equipment or other requirements such as home care support. The needs of carer/s can also be assessed. In some cases, a telephone assessment may be deemed to be appropriate, see para 4.5.6.
- 4.5.2 OTs will have regard to best practice and guidance when undertaking assessments and option appraisals⁵. In certain circumstances

⁵ Home Adaptations for Disabled People; A Detailed Guide to Related Legislation, Guidance and Good practice. Home Adaptations Consortium 2013

specialist colleagues and specialist organisations will be engaged in the process, for example for people with sensory impairment, people with learning difficulties, people with deteriorating illness and people with mental health needs.

- 4.5.3 Social services provide advice, information and aids for people who have serious difficulties with their sight or hearing and for their carers. There is also help from Hearing Loss Cornwall which is a long-established Cornish charity promoting inclusion and deaf awareness across Cornwall and the Isles of Scilly. Hearing Loss Cornwall can provide information, advice, training and communication support, including British Sign Language interpretation services.
<http://www.hearinglosscornwall.org/>
- 4.5.4 Childrens services include the Vision Support Team and the Hearing Support Team. Visit the [Vision Support Team](#) web pages. Visit the [Hearing Support Team](#) web pages.
- 4.5.5 Staff involved in providing an adaptation for a disabled person who has a sensory or cognitive impairment will consult with such appropriate specialist colleagues to facilitate communication with the disabled person and to help with the assessment process.
- 4.5.6 Regulations⁶ state that assessment for adults must be appropriate and proportionate and local authorities must ensure that assessors are skilled, knowledgeable, competent and appropriately trained⁷. Guidance, in relation to adults, states that simpler needs might be amenable to assessment on the telephone⁸. Telephone assessments for simpler needs are undertaken for adults at the Access Team.
- 4.5.7 Guidance regarding assessments for home adaptations advises that the DFG legislation does not specify that an occupational therapist needs to be used in every case to assess needs. Advice from the Royal College of Occupational Therapists on providing adaptations without delay has emphasised this point⁹. The guidance defines three levels of adaptations:

a) Universal

⁶ SI 2014/2827. Care and Support (Assessment) Regulations 2014

⁷ SI 2014/2827. Care and Support (Assessment) Regulations 2014.

⁸ Department of Health. Care and Support Statutory Guidance: issued under the Care Act 2014, para 4.22.

⁹ Adaptations without delay; a guide to planning and delivering home adaptations differently. Royal College of Occupational Therapists <https://www.rcot.co.uk/adaptations-without-delay>

- b) Targeted
- c) Specialist

- 4.5.8 Universal types of intervention and services enable people with low levels of needs to make informed decisions about how to stay well through the timely provision of home adaptations. The solution is simple and they or their carer can be signposted to retail options and/or supported to install simple adaptations.
- 4.5.9 Targeted types of intervention and services enable older or disabled people with long-term health conditions to maintain their personal dignity, reduce risks and live well in their own homes through the timely provision of adaptations. The person's situation is simple and straightforward, but support is required to identify the most appropriate solution. In such simple and straightforward situations an assessment may be undertaken by a trained Trusted Assessor (TA) or Occupational Therapy Assistant (OTA). The solution could be universal but is likely to be a non-structural adaptation or standard structural solution.
- 4.5.10 Specialist types of interventions and services empower people with complex health and social care needs to maintain their personal dignity and reduce unplanned health and social service care needs through the timely provision of home adaptations. Due to the complexity of the situation it is likely the solution will be a personalised non-structural or specialist structural adaptation. The assessment would be undertaken by an Occupational Therapist.
- 4.5.11 Appendix 5 provides tables for each level of intervention with detailed information about factors contributing to complexity at that level¹⁰. Each table sets out the staff skills and operational factors that need to be considered to provide each level of intervention to achieve the best personal outcomes.
- 4.5.12 This Policy advocates the use of a range of officers with the right skills to offer a proportionate and timely response to the need for an assessment. Occupational Therapy Assistants (OTAs) and Trusted Assessors (TAs) can assess for access (stairlifts & ramping) and bathing needs in simple and straight forward situations. Other appropriately trained professionals can also refer for an adaptation. Examples include: Rehabilitation Officer for Visually Impaired (ROVI),

¹⁰ RCOT Adaptations without delay; a guide to planning and delivering home adaptations differently. Royal College of Occupational Therapists <https://www.rcot.co.uk/adaptations-without-delay>

Health OTs and Community OTs. Through this approach Occupational Therapist's scarce resources can be targeted at complex cases.

- 4.5.13 The assessment of disabled children and young people will always be undertaken by a qualified paediatric OT.
- 4.5.14 The disabled adult, young person or child may be involved in the assessment of their own needs. This is appropriate and consistent with policy developments across the social care and health agenda that argue for the primacy of a disabled persons' perspective above all others. The views of parents, family and carers are also important, especially if they live in the same household.
- 4.5.15 A disabled adult's self-assessment of their need for an adaptation may form the basis of an assessment. We encourage people to identify their own needs and through self-assessment or telephone assessments some adaptations and equipment can be provided without the need for a face to face assessment.
- 4.5.16 Where an assessed need is determined the Council is obliged to meet that need, however it is entitled to consider a range of ways of meeting the need¹¹. It will do so by ensuring a robust evaluation of options and determination of most appropriate individualized solution.
- 4.5.17 Prior to making a recommendation for an adaptation the Assessor will consider whether it's best to meet needs through the issue of equipment and/or aids and/or re-housing to accommodation that is, or can be, suitably adapted to meet need. The Council can discharge its duties under the Care Act 2014 and/or the Chronically Sick and Disabled Persons Act 1970 by any of these means.
- 4.5.18 The Assessor will consider whether the proposed adaptations are to meet a purpose as set out in section 23(1) Housing Grants Construction & Regeneration Act 1996. The purposes relate to:
- i. Access: door widening, removing a door threshold, long wheelchair ramp, external wheelchair lift, or provision of a new room if access is not possible
 - ii. Moving around and between floors: stairlift or through-floor wheelchair lift, ensuring enough turn-circle for a wheelchair user

¹¹ R V Kirklees MBC ex parte Daykin (197 – 98) 1 CCLR 512 QBD

- iii. Washing: level access or wet-room wheelchair accessible shower, or one with a seat; wheelchair accessible wash basin and wider bathroom
- iv. Toileting: hands-free automatic toilet
- v. Eating/food preparation: wheelchair accessible kitchen facilities
- vi. Controls: adapting heating or lighting controls to make them easier for you to use e.g. for poor grip strength
- vii. Heating: improving the heating system in your home to make it suitable for your needs, for example if it directly affects your medical condition
- viii. Garden: improving access to a garden by making it easier or safer.

See Appendix 6 for detail.

- 4.5.19 All recommendations for an adaptation will comply with the principle of best value and minimum intervention. The most economic options should always be considered first, if this will meet the need and is eligible work.
- 4.5.20 Where the assessment of need identifies a requirement for additional facilities that can only be provided by means of an extension or conversion of an outbuilding/garage the Assessor will consider all housing options including relocation to an alternative property.
- 4.5.21 Assessments of disabled children should consider the developmental needs of the child, the needs of their parents as carers and the needs of other children in the family. The assessment of need for children with physical, sensory and cognitive impairments will involve all relevant agencies such as: housing, social services, education and health. Where possible the child will make their own contribution to this process and that contribution should develop as they grow older.
- 4.5.22 The Assessor is responsible for ensuring that, wherever possible, the assessment takes account of the long term needs to prevent and avoid the need for unplanned multiple adaptations to the same home. It is acknowledged that there will be cases, such as sudden deterioration in health, where this may not be feasible. If a property is not suitable for a person's long-term needs, the Assessor will use their professional judgement to determine whether to recommend a major adaptation.

- 4.5.23 On occasions a property may not be made fully accessible however some adaptations may be preferable than not receiving any help and can prevent a person's health deteriorating and reduce risk. For example, provision of a stairlift in a home that has no level access.
- 4.5.24 If the Assessor determines that adapting the home environment will meet needs, they will recommend adaptations that are necessary & appropriate to meet that need. This recommendation will be sent to either CHS or, for Cornwall Council tenants, to CHL. CHS/CHL will then determine the relevant works.

4.6 Major Adaptations – Relevant Works

In determining the relevant works CHS/CHL will consider the following factors:

- i. Are the works necessary and appropriate to meet the needs of the disabled person (see Appendix 3); and
- ii. Are the works reasonable and practicable to be undertaken having regard to the age and condition of the dwelling (see Appendix 3).
- iii. Are the proposed adaptations needed to provide for a care plan to be implemented which will enable the disabled occupant to remain living in their existing home as independently as possible
- iv. Would the proposed adaptations meet, as far as possible, the assessed needs of the disabled person considering both their medical and physical needs
- v. Do the proposed adaptations distinguish between what are desirable and possible legitimate aspirations of the person with disabilities, and what is needed, and for which grant support is fully justified?

4.6.1 Several key principles, as recommended by the findings of the DFG review¹², will be adopted when determining relevant work:

- i. The need to retain (or restore) dignity
- ii. The need to recognise a persons desired outcome from the intervention
- iii. The need to minimise barriers to independence
- iv. The need for some element of choice
- v. The need for good communication as part of giving choice
- vi. The needs of other family members and of the family as a whole

¹² DFG review 2018 [dfg-review-2018-main-report-final-nov-2018a.pdf](https://foundations.uk.com/dfg-review-2018-main-report-final-nov-2018a.pdf) (foundations.uk.com)

- vii. The needs of children for growth & change and need for enough space
- 4.6.2 If the works are not considered to be 'relevant works', then alternative housing solutions will be considered, and support provided to assist with relocation (See clause 4.15) Urgent adaptations to the existing home may be provided whilst awaiting a move.
- 4.6.3 Where there are two people/children with a disability residing in the same accommodation each person/child will receive an assessment of their needs. If the assessments result in a recommendation for an adaptation each person/child can apply for a major adaptation. The total scheme of relevant works will be considered when determining whether adaptations to that property are necessary, appropriate, reasonable and practicable.
- 4.6.4 Works to communal areas, for example entrance hallway to a block of flats, are limited to works to facilitate access to the dwelling through the communal areas or facilitating the use by the person with a disability of a source of power, lighting or heating in the communal areas. The impact of the adaptation such as hazards or risks on other residents of the building will be assessed before any adaptation is agreed. The Council will also need to satisfy itself that the customer has the power or is under a duty to carry out relevant works in the communal area. Each case will be considered on its merits.
- 4.6.5 Wherever possible a property must be adapted within the existing internal structure. The re-designation of rooms should be considered first before any significant adaptations such as extensions are recommended. For example, the building of an extension to accommodate an additional bedroom will not be recommended where a dining room could be converted to provide the facility or where a large family room could be sub divided. Account will be taken of the family's needs in terms of living space.
- 4.6.6 Where the proposed adaptations are more extensive than is necessary to achieve the purposes as set out in Section 23(1) of the HGC&R Act 1996. CHS/CHL will only be obliged to provide for relevant works. Each application will be considered on an individual basis and on its own merits. The implications of choice, in terms of financial assistance and any risk to health and safety will be fully explained to the customer and confirmed in writing.

- 4.6.7 The council understands that sometimes a service user may wish to have a scheme designed which goes over and above the approved eligible scheme (i.e. the scheme recommended by the adaptations surveyor and occupational therapist). Please see Appendix 7 on Enhanced Schemes.

4.7 Policy Tools

Information & Advice:

Information and Advice will be provided in a format that can be readily accessed and understood by a service user. Officers will identify a service user's preferred form of communication and will ensure that they and OTs/Assessors and contractors use the preferred form of communication.

Documents will be provided in accessible formats. Documents will be sent in formats which screen-readers can interface with, and audio versions will be sent out as MP3 files. Use of lip speakers, British Sign Language (BSL) interpreters and alternate methods of communication are understood and available as part of the service.

Information and advice provided may include:

- i. **Housing Options**; Service Providers (SPs) such as: CHS, CHL, Therapy teams within Social Services and Registered Providers all provide information & advice on appropriate housing options. This includes helping people plan and thinking about their housing options before a crisis. The Elderly Accommodation Counsel (EAC) has developed a useful online tool '[Housing Options for Older People](#)' (HOOP). This signposting tool guides service users to appropriate agencies for advice and information. Links to this website can be found on SPs websites;
- ii. **Discharge from Hospital**: Support is provided by the Homeless Patient Hospital Discharge Service, the Housing Options team and CHS. These services provide advice and planned discharge into suitable accommodation for those who are homeless prior to admission to hospital or those who are unable to return home because their home needs adaptations or repairs to address hazards;
- iii. **Signposting**; SPs will signpost to access other local support services such as energy efficiency advice & information, benefit health checks, charities, and independent financial advice;
- iv. **A design and installation service for adaptations**; CHS and CHL offer a range of services including: planning & design adaptations

to meet necessary & appropriate needs, securing the necessary planning and building control permissions, instructing contractors and monitoring works on site;

- v. **Eligibility for funding;** CHS will provide advice on eligibility to access the DFG and support with the making of an application. CHL will provide advice and support to tenants of Cornwall Council and advise whether an adaptation can be funded from the Housing Revenue Account (HRA).
- vi. **Self-help;** CHS/CHL will offer project management services to people who wish to undertake their own housing adaptations and pay for the work from their own funds. Service users applying for a DFG may also wish to use the services of an agent or an Architect, Architectural Technician or surveyor rather than the services offered by CHS. Applicants are advised to have a clear agreement on what they have commissioned to be done and should consult with CHS prior to appointing an Architect/Surveyor and agreeing fees to check what level of fees might be grant aided,

4.8 Financial Assistance to Adapt the Home

4.8.1 Self-Funders

Many people choose to fund their own adaptations without seeking any advice or information from the Council and often worry about employing rogue traders. In response to this challenge CHS offer a paid for service.

- 4.8.1.1 Anyone wishing to progress an adaptation can appoint CHS as an agent and receive help with the design and specification of a scheme. CHS can also provide advice and support to choose an accredited contractor/tradesperson.
- 4.8.1.2 The fee for facilitating private self-funded work is 10% of cost of works (plus VAT). There is a non-refundable deposit of £300 (£250 + VAT). If works go ahead, the £300 is deducted from the final fee.
- 4.8.1.3 **Registered Providers;** some RPs in Cornwall will help meet the cost of a major adaptation. Examples are: Anchor & Hanover Housing Ltd
- 4.8.1.4 **Charitable Funding;** officers will also support people to apply to charitable sources to help meet the cost of an adaptation or where particular needs cannot be met from in-house services. A useful organisation supporting access to charitable funding is [‘Turn 2 Us’](#). Other examples include:

- [Independence at Home](#)
- Royal British Legion
- The Soldiers, Sailors, Air Force Association (SSAFA)

4.8.2 Mandatory DFG/HRA funded Adaptations

Mandatory DFG is the most common funding route for major adaptations to the homes of owner occupiers, private tenants and tenants of Registered Providers (RPs). CHL fund major adaptations to Cornwall Council stock from the Housing Revenue Account (HRA). The maximum grant/HRA allowance is £30,000 per scheme. The same eligibility criteria will be adopted for both DFG and HRA funded adaptations. See Appendix 4 for further details on eligibility and funding conditions.

4.8.2.1 Funding an adaptation from either the DFG or the HRA will be mandatory if the work is necessary & appropriate to meet need and reasonable & practicable to undertake, see Appendix 3. The funding may be subject to a means test, see para 4.11. The work must be for the benefit of a disabled person who occupies the dwelling. The Housing Grants, Construction and Regeneration Act 1996 states a person is disabled if:

- i. Sight, hearing or speech is substantially impaired
- ii. A mental disorder or impairment of any kind
- iii. Physically substantially disabled by illness, injury, impairment present since birth, or otherwise
- iv. Are or could be registered disabled with a social services department

4.8.2.2 The cost of extended warranties/maintenance for the servicing and repairs of stairlifts, through floor lifts (TFLs), step lifts, linear lifts & platform lifts will be included within the cost of eligible grant works. This is in accordance with the 2006 Good Guidance on adaptations¹³. The cost will be reasonable costs and will be informed from benchmarking. A client can choose which company to purchase the extended warranty from. Any costs over and above the grant will be their responsibility to fund. For private and social rented accommodation, the costs will be factored into any grant award. For CC stock CHL will fund and plan for maintenance of such equipment.

4.8.2.3 The funding of any necessary repairs that are required to enable the adaptation work to proceed will be considered for inclusion in the

¹³ 2006 guidance, para 4.39.

funding award. For example, undertaking electrical repairs to a home where a new level access shower or stair lift/platform lift is being provided

- 4.8.2.4 The funding will include costs associated with the services which fall within the meaning of ‘ancillary costs’¹⁴. Section 2(3)(b) of the 1996 Act (and the associated regulations) makes clear that all ancillary costs ought to be included in the grant¹⁵. Examples of such costs include professional fees such as costs associated with a structural engineers’ report. CHS and CHL may accept referrals from private Occupational Therapists or other health specialists including Trusted Assessors who are engaged by the applicant to advise on what works are required to meet their individual needs. The costs of these professional assessments may be included under the grant. CHS will consider engaging agency occupational therapists where extended waiting lists occur and cover the costs using the DFG capital grant.
- 4.8.2.5 Costs associated with any necessary furniture storage where required to facilitate adaptation work will also be considered for funding.
- 4.8.2.6 Disabled people who apply for the Homechoice Register seeking adapted/accessible accommodation will be advised to complete a welfare assessment form. This form will be used to inform the Welfare Panel (WP) of medical circumstances. The WP may award additional priority depending on the circumstances and how the home is affecting health & wellbeing. Additional supporting information may be required from an OT.
- 4.8.3 **Discretionary Accessible Homes Assistance (AHA)**
AHA will be considered for the funding of specialist equipment, not funded by Health, if the equipment meets the assessed need, achieves a purpose under section 23(1) of the HGC&R Act 1996 and prevents the need for an adaptation or can be achieved at a lower cost. Such equipment will belong to the grant recipient who will be responsible for its maintenance and any servicing. Examples include provision of a wheelchair seat riser to provide access to worktops rather than adapting a kitchen. The riser must be more cost effective and meet the customer’s needs. In the case of social housing stock, CHL or the RP will determine whether funding specialist equipment rather than adapting a home will deliver best value. The RPs and CHL may choose to fund an adaptation where it is seen as an investment

¹⁴ Housing Renewal Grants (Services and Charges) Order 1996 SI No 2889 part 2

¹⁵ Housing Grants, Construction and Regeneration Act 1996

and increases the level of accessible housing within the social rented sector.

- 4.8.3.1 AHA will be considered to help fund: storage facilities for large equipment, space for home office/study. The works will only be eligible where an Assessor has deemed them to be necessary & appropriate to meet the needs of a disabled person and CHS/CHL deem them to be reasonable & practicable to undertake. When considering whether to provide storage facilities the Assessor will consider impact on any care package the person receives. CHS/CHL will consider the size and layout of the property and whether cost is prohibitive. The opportunity to implement external recyclable storage arrangements will be considered subject to installation costs.
- 4.8.3.2 AHA will be available to Registered Social Housing Providers (RP) to help fund work more than £30K. The funding will be subject to a condition that the property is advertised as an accessible home. The funding is also subject to the condition that upon disposal the RP will reinvest an equivalent sum into adaptations/adapted properties. For CC tenants CHL will consider making use of the HRA to fund work more than £30K;
- 4.8.3.3 The funding of reinstatement works on private rented property to enable removal of an adaptation and making good any damage at the end of a tenancy. The funding is available for private landlords only. It is expected that RPs will retain adaptations within their housing stock to increase the number of accessible/adapted homes within the social housing sector. Officers from CHS will determine eligible works and determine a reasonable price for these works to inform the grant determination.
- 4.8.3.4 The AHA can fund emergency adaptations & repairs costing up to £7K. For works funded via the scheme, the normal grant process will be bypassed to install the works as speedily and efficiently as possible. The work will be directly awarded to a Design & Install contractor with no need to complete a means test. All grant paperwork will be completed following the adaptation. This will only be used in urgent cases for clients who for example (i) have a terminal illness (ii) need to be discharged from hospital and works would facilitate hospital discharge.
- 4.8.3.5 AHA is available to remove or minimise barriers to independence, retain (or restore) dignity and meet wellbeing needs of those adults and children with learning disabilities. Example of work includes

additional facilities such as kitchen and/or bathroom to enable transition to independent living. Works must be deemed as necessary to support independent living, retain (or restore) dignity and be recommended by an Occupational Therapist and/or Social Worker.

AHA will be available for adaptations to the home environment to help someone with dementia to continue to do things for themselves for longer and to stay independent. Adaptations can offer family and carers the reassurance of the person's safety and security. Major adaptations for dementia can include ramps, door widening for wheelchairs, installing specially designed shower and toilet facilities, or changing the design of the home to make it more dementia friendly such as safety flooring and extra lighting.

4.8.4 **Stairlift Service Level Agreement**

Stairlifts will not be subject to any means test or grant application thereby cutting down on process time and speeding up delivery. CHS has a Service Level Agreement (SLA) with Tremorvah for the provision, installation and recycling of all stairlifts including curved stairlifts. A new pathway removing the administering of individual grants and allowing direct award to Tremorvah has cut down on process and improved response times. The average time taken from receipt of an Assessor's recommendation to completion of a curved stairlift is 32 days and for a straight stairlift 28 days. Prior to the introduction of the streamlined pathway curved stairlifts took 53 days and straight 43 days. The SLA with Tremorvah also provides for the repair of stairlifts less than five years old and not subject to an extended warranty.

4.8.5 **Interest Free Loans**

The maximum grant for a DFG is £30,000 but in some cases the cost of work exceeds this amount. The Council does not have a duty to assist in meeting any shortfall between the amount of grant and the cost of work. The Council is using its discretion and powers under the RRO to assist eligible persons by means of a loan. A Council loan will only be available in cases of hardship and where evidence is provided that the applicant is unable to secure a commercial loan.

- 4.8.5.1 Only eligible mandatory works deemed necessary & appropriate to meet needs can be considered for a loan. The loan isn't available to fund enhanced/alternative schemes or more costly work. Any loans more than £10,000 are subject to a legal charge on the property and become repayable, in full to the Council in the event of a change of

ownership or breach of occupation conditions. For tenants of Cornwall Council CHL will determine whether to fund work more than the £30K using HRA funds. All cases will be referred to the Adaptations Panel to ensure consistent and transparent decision making (see 4.14).

- 4.8.5.2 The Council doesn't have a duty to assist in meeting any share of the costs which the owner/occupier, private landlord or tenant is assessed to be responsible for under the test of resources also referred to as the Means Test (see 4.11).

4.9 Application Process- Who can apply?

Homeowners and tenants can apply for funding to help with the cost of adapting their home or relocating to a new one. Certain licensees or occupiers of houseboats or park homes can also apply. An applicant does not have to be the disabled person for whom the works are required. For example, a landlord, can apply to have their property adapted for a disabled tenant. (See Appendix 4 for eligibility criteria).

- 4.9.1 Applicants for DFG funding must sign a certificate stating the disabled occupant has an intention to live in the property for at least five years after the works are completed or for a shorter period if there is health or other special reasons. As this proves difficult for private tenants with many on assured-short-hold tenancies CHS will accept a certificate of intended letting for a shorter period of two years. Tenants of registered providers of social housing are eligible to apply to CHS for a DFG and are assessed based on their needs on the same basis as private tenants and owner-occupiers. Cornwall Council tenants can apply for assistance from Cornwall Housing Limited.

- 4.9.2 For people with a degenerative condition there may be a need for more home adaptations over a period. Both CHS and CHL will approve successive applications for funding as needs change.

4.10 Application Process & Prioritisation

Requests for adaptations within Cornwall Council stock will be managed by CHL and there is no application form. All OT requests referred to CHL for an adaptation will be considered for HRA funding. CHL will determine a request for an adaptation with 4 weeks from the date of receipt of the OTs recommendation.

- 4.10.1 CHS has adopted two simple application forms for financial assistance; a Financial Assistance Form (FAF) for all grants and an application form for the Interest Free Loans. These forms are sent to clients upon receipt of the OTs recommendation. CHS considers that an application for a DFG funded adaptation (does not apply to CC stock) has been submitted at the point of a satisfactorily completed application form, along with quotations for the work, landlord certificates, signed certificates of future occupation and any relevant permission. CHS, if acting as agents, provide support to DFG applicants to assist them with this process.
- 4.10.2 Completed applications received by CHS for all grants and for loans under £10,000 will be determined within 4 weeks.
- 4.10.3 A determination of the application will be sent in writing to the service user advising whether the adaptation will be funded and the level of funding. If an applicant is unhappy with the decision, they can write to either the Head of Cornwall Home Solutions or Director of Homes & Investment CHL for a review.
- 4.10.4 The DFG legislation doesn't limit the number of applications and financial considerations can't be used to refuse a DFG. This same principle will apply to adaptations within CHL stock that are funded from the HRA. Where there is a lack of available HRA budget a request for additional funding will be made to the Service Director Housing.
- 4.10.5 Where there are enough funds and there is no waiting list, cases will be dealt with in a chronological basis i.e. Urgent cases first in date order. However, where there is a waiting list CHS and CHL will operate a system of prioritisation. The system factors in time waiting alongside the urgency of the case. The urgency of the case is determined by the OT/Assessor and is indicated on the referral/recommendation.

4.11 Determining Applicant Contribution

The 'means test' is used to assess the level of a person's contribution towards the cost of eligible works and is based on a formula calculating a notional level of need (the amount the government says you need to live on each week) compared to the relevant person's income and capital. The means test is set out in the Housing Renewal Grants Regulations 1996 (SI 1996/2890, as amended).

- 4.11.1 DFG and HRA funded adaptations are means tested for adults. In the financial assessment, income and savings are considered as well as any partners. This applies even if the application is made by someone else such as the owner of the property.
- 4.11.2 Capital is considered, together with your partner's if you have one. Certain capital is disregarded, for example your own property. The first £6,000 of your capital is ignored. If you are under 60, you are assumed to have income of £1 a week for every £250 you have over £6,000. If you are over 60, you are assumed to have £1 a week for every £500 over £6,000. Your income is worked out as an average over the past 12 months, or a shorter period if this improves accuracy. There are certain earnings and income disregards.
- 4.11.3 An applicable amount is calculated based on weekly living needs, with a housing allowance of £61.30 a week. If income is less than, or equal to, the applicable amount, an applicant is not normally expected to contribute to the costs of the works. If income is more than the applicable amount, an applicant may only receive part of the DFG amount or possibly none. An applicant doesn't normally contribute if in receipt of one of the following benefits, referred to as passporting benefits, unless there are other people also being assessed who do not receive such benefits:
- i. Pension Credit Guarantee Credit
 - ii. Income Support
 - iii. Income-related Employment and Support Allowance
 - iv. Income-based Jobseeker's Allowance
 - v. Housing Benefit
 - vi. Working Tax Credit or Child Tax Credit with gross taxable income of less than £15,050.
 - vii. Universal Credit.
- 4.11.4 There is a lean means test for works estimated to cost £7K or less. A signed declaration will be sought from the applicant declaring that they are in receipt of a passporting benefit. If a signed declaration is provided, then no further financial checks will be undertaken.
- 4.11.5 The following are exempt from the means test:
- i. Where an application is made on behalf of a disabled child or young person;
 - ii. If the work relates to a stairlift;

- iii. Fund emergency adaptations & repairs costing up to £7K under discretionary AHA.

4.11.6 This Policy provides for an interest free loan to help with a person's contribution where an applicant has a contribution towards works costing up to £30,000 or where the cost of the works exceeds the £30,000 grant limit. For work in CC stock that exceeds the £30,000 limit consideration will be given to funding from the HRA.

4.12 Application Process – Eligibility & Refusals

There are occasions where a person may not be eligible to apply for financial assistance towards adaptations, these include:

- i. Unable to provide proof of Ownership/Occupancy/tenancy,
- ii. Where there is no intention for the disabled person to remain in occupation for five years (this is reduced to two years for applications from private landlords),
- iii. Where a person is required to contribute funds but declines to do so;
- iv. If a customer withholds information that is necessary for a means test (does not apply to Children & young people's cases);
- v. Landlord refuses to consent to work. In such cases the disabled person will be provided with advice & information regarding Landlords responsibilities and duties under the Equalities Act. Support will be provided, and action taken if considered to be homeless at home;
- vi. Where adaptations aren't deemed to be necessary and/or appropriate to meet need, see Appendix 3 for further details
- vii. Where the adaptations aren't deemed to be reasonable or practicable, see Appendix 3 for further details

4.12.1 An adaptation within the social housing stock will not be refused on the basis that the adaptation would make the property difficult to re-let. The primary focus will be on addressing the needs of the existing tenant.

4.12.2 An adaptation within the social housing stock will not be refused on the basis that the occupants are under occupying a property. Tenants will be given the same choice to stay put that is given to home owners.

4.12.3 All refusals will be monitored to ensure consistent application of the Policy. A monthly report will be submitted to CHS management team identifying all refusals for funding.

- 4.12.4 In the event a person isn't eligible for financial assistance CHS/CHL will contact the applicant to give them the opportunity to provide additional information which may affect such a decision. Where CHS/CHL has no option but to refuse an application for financial assistance, CHS/CHL will advise the applicant of the reasons for such refusal.
- 4.12.5 An applicant will have the right to a review of such a decision. The review should be requested in writing to the Head of Cornwall Home Solutions, or for CC tenants the Director of Homes & Investment, within 28 days of the date of the refusal letter.

4.13 Making Best Use of Existing Social Housing Stock. The Allocations Policy facilitates and supports allocation of both adapted and general needs (GN) properties. Firstly, it applies preference to adapted homes to ensure that they are allocated to households who have a need for that adaptation. Secondly, it supports allocation of GN properties:

“Where there is an urgent need for a move to an adapted/accessible property but there are none available, an applicant may apply for a general needs property if it will significantly improve their circumstances and will enable essential adaptations to be carried out which cannot be reasonably or economically carried out in their existing property”.

- 4.13.1 All disabled people registering on Homechoice will be asked whether they would remain in their existing home if the home was adapted. If an applicant advises that this would be the case, then the client will be advised to request an OTs assessment and referred to either the MARU or the Access team depending on whether the disabled occupant is a child or adult respectively.
- 4.13.2 If the client isn't interested in adapting their home, they will be advised to complete a welfare assessment form. This form will be used to inform the Welfare Panel (WP) of medical circumstances. The WP may award additional priority depending on the circumstances and how the home is affecting health & wellbeing. Additional supporting information may be required from an OT to evidence how the home is affecting health & wellbeing.

- 4.13.3 Where properties are nominated the applicant and any advocate will be made aware of the nomination and be enabled to inform the decision as to whether to accept the offer.
- 4.13.4 Due to the limited number of adapted/accessible properties no property will be refused by the landlord because it's not adapted or accessible. To do so puts many disabled people at a considerable disadvantage. Consideration will be given to whether the property can be adapted to meet the needs of the applicant and if so whether it's reasonable to do so. The landlord may require an assessment by a suitably qualified/trained Assessor to inform decision regarding offer of accommodation.
- 4.13.5 In such circumstances an Assessor in consultation with the applicant will identify what works, if any, are required to make the property suitable. The landlord can then make an informed decision about an offer. This decision will take account of the personal characteristics of the individual and whether it would be feasible to make the property suitable. This decision may include whether there is potential funding available to make the adaptations & whether it would be reasonable in all the circumstances to refuse the applicant.
- 4.13.6 Where an offer is withdrawn a clear explanation of the decision-making process will be provided to the applicant and/or advocate by the Homechoice team.
- 4.13.7 Existing tenants transferring from one CC property to another will have the cost of the adaptation funded from the HRA. Mandatory DFG will be considered for funding the cost of adapting a Cornwall Council property for an applicant on the Homechoice register if they aren't currently a tenant of CC. This will ensure a disabled applicant isn't refused a viewing or a nomination on the basis that the property needs adapting. The Assessor will advise whether the successful applicant can occupy prior to completion of adaptations. Where accommodation is to be adapted prior to occupation, delivery of adaptations is to be fast tracked to ensure a timely response. The funding will only be available on schemes that CHS consider feasible for adaptation and where the proposed tenant is eligible for a DFG/HRA funded adaptation.
- 4.13.8 If a property is refused by a disabled applicant because of a lack of accessibility issues and/or the bathroom not being suitable, the Homechoice team will offer to signpost to CHS or CHL, depending on

tenure, for advice on adaptations to either the advertised property or their current home.

4.13.9 If the Access Team/MARU ascertains that a disabled person is likely to become homeless in 56 days, they are to alert the Housing Options team. The Housing Options team will provide support to prevent them becoming homeless. This may include support to find a new home via Homechoice or advice to help them sustain a tenancy or home ownership. The Access Team/MARU will refer to the Therapy Team Leads as Urgent priority to ensure disabled people threatened with homeless receive a timely OTs assessment. The OT will support the client until the client is successfully relocated.

4.13.10 To better match accessible accommodation and adapted stock to those in need CHL and RPs will:

- i. Ensure adaptations such as level access showers and wet rooms are left in the property for incoming tenants. This will be in accordance with Asset Management Policies which identify properties where adaptations should be retained.
- ii. Aim to match properties that have had major adaptations to tenants with that need.
- iii. Offer incentives to tenants to encourage them to release an adapted property when their household no longer requires it.
- iv. Consider offering adapted and specifically designed properties on tenancy criteria that links property to a person's needs. This will ensure adapted properties remain occupied by tenants who need them
- v. Support mutual exchange and ensure that the exchange meets the clinical needs of all parties and that adapted properties are let appropriately to those in need.
- vi. Identify and categorise stock with a preference label in terms of adaptations/accessibility.
- vii. Consider use of void properties that have had major adaptations for use as temporary accommodation until a suitable applicant can be found to prevent it returning to general needs. This is at the discretion of the RP/CHL.
- viii. Provide and share details of adapted stock and need for adaptations to inform allocation of adapted properties. For example, make use of intelligence to develop an annual letting plan for adapted properties.
- ix. Share intelligence to inform future development programmes of new build and the need for additional accessible homes.

- x. Plan property modernisation programmes and scheduled refurbishments taking account of the needs of disabled people.
- xi. Work in partnership with relevant organisations such as Disability Cornwall, to support development of any Choice Based Letting system or register of adapted stock.
- xii. Make use of intelligence on adapted/accessible stock to inform future service delivery & budget planning and meet the needs of older and disabled people in Cornwall.

4.13.11 Using Intelligence to Inform Future Housing Developments

The wheelchair project undertaken by CHS revealed that there are many wheelchair users on the Homechoice register whose search for an accessible home may take many months. The nature of the disability means that there is often a requirement for level access and/or an element of ground floor bedroom & bathroom provision needed. Due to the lack of wheelchair accessible housing this means that often the most common solution is to adapt an existing home by providing a ground floor extension.

- 4.13.12 Large families with disabled children often have the longest wait. Figures from Homechoice (end of May 2019) identified 12 families requiring 4-bedroom wheelchair accessible properties. The median average waiting time being 27 months, based on the application date. The figures are drastically reduced by having newer applicants with the oldest application date being 51 months.

Table 2; waiting times for Homechoice applicants requiring 4 bed properties and registered as mobility category 1 (wheelchair user)

Parish	Band	Time	GENL	TRAN	Grand Total
Bude-Stratton	C	51months		1	1
Hayle	A	26months	1		1
		6months	1		1
Launceston	E	49months	1		1
Saltash	C	22months		1	1
St Clement	A	6months	1		1
St Erth	A	26months	1		1
St Kew	C	36months		1	1
St Merryn	A	6months	1		1
St Stephen-in-Brannel	C	51months		1	1
St Teath	C	36months		1	1
Grand Total			7	5	12

4.13.13 Meeting the needs of wheelchair users and families who require 4/5/6/ bed accessible housing will only be secured by increasing options. Collaborative working between the Welfare Panel, the Homechoice Partnership, the Housing Development Team and Affordable Housing is essential to address the immediate issues and plan for future needs as families grow and blend. This partnership will consider all options including:

- i. Adapting & extending existing 3 bed void stock
- ii. Use the data and intelligence captured on Homechoice applications and at Welfare Panels to proactively inform the housing mix and property type on new developments as noted in the Allocations Policy and Homechoice Framework.
- iii. Make provision within planned developments
- iv. Source and buy properties in the private sector
- v. Work with the Private Landlords who are willing to adapt large 4/5/6 bed properties
- vi. Collaborate with the private sector empty home scheme to identify larger properties suitable for adapting as there may be incentives to bring back into use
- vii. Use data to inform review of the Local Plan and secure adoption of optional Building Regulations Standard M4(3) with a target for all new developments

4.14 Adaptations Panel

To ensure an equitable and transparent approach to decision making, value for money and the appropriateness of proposed adaptations the council has established an Adaptations Panel. See Appendix 8 for

Terms of Reference, process for referrals to the AP and membership of the Panel.

- 4.14.1 Applications which match the following criteria will be submitted to the Adaptations Panel irrespective of the source of funding:
- i. Work costing over £30K such as extension, conversion;
 - ii. Loan applications of £20K and above
 - iii. Cases falling outside of this Policy
- 4.14.2 When considering whether to approve such work the following factors will be considered:
- i. Whether the work is for a purpose under the Housing, Grants Construction & Regeneration Act 1996, this will be noted on the OTs statement of need (refer to Appendix 6);
 - ii. Whether the work is reasonable & practicable, this will be determined by either CHS or CHL (refer to Appendix 3);
 - iii. Whether the work is necessary & appropriate to meet need, this will be noted on the OTs statement of need (refer to Appendix 3);
 - iv. Whether rehousing has been considered by the OT and dismissed as the preferred solution. The OT will have considered the likelihood of a *suitable* property being available within *an acceptable radius* and *an acceptable timeframe* that *adequately meets* the need and rehousing will not create any further care needs (see notes 4.14.3 below);
 - v. The increased financial expenditure for the applicant and the need to be satisfied that the applicant has been duly informed of the implications such high cost work may have on: rent, insurance, benefits, council tax, energy bills, maintenance costs etc.
 - vi. The outcome of a Means Test to identify any required contributions the applicant must make towards the cost of the physical works and any ancillary fees/charges. If these are not acceptable to the applicant for any reason, the works cannot be progressed.
 - vii. Any other costs that may need to be incurred by the applicant because of having extensive adaptations undertaken at the property including: relocation costs, storage costs, utility costs, paying costs on two homes if needed to move out, paying rent on temporary accommodation if needed to move out to allow work to progress.

4.14.3 An acceptable radius will be defined by the Assessor on an individual case by case basis considering individual care and support needs. An acceptable timescale is defined as one that can be met before the customer's needs become urgent (as defined by the OT), or within the 6-month legal time frame that the HGCR Act stipulates a decision on all DFG applications must be made. The term 'adequately meets the need' refers to both the customer's (and any spouse/carer/family needs) physical and mental needs, plus social support needs relating to locality (family support, schools etc).

4.14.4 Written notification of the Panel decision will be sent to the applicant. In cases where the applicant disagrees with the decision of the Panel the decision will be delegated to the Head of Cornwall Home Solutions in consultation with the Service Director for Housing.

4.15 Relocation Support & Relocation Support Grant (RSG)

Adapting the home may not always be the right decision for people. Sometimes it is better that people move on to new accommodation as their health and social circumstances change. Listed below are just a few of the reasons why moving home may be the better option:

- i. When another home has the necessary adaptations to meet your needs.
- ii. When the current home needs major adaptations such as an extension or major structural changes, especially if the cost of the adaptation is likely to go over £30,000.
- iii. When you cannot access a significant proportion of your living space i.e. the first floor.
- iv. If your home is above the ground floor and there is no lift and no possibility of installing one.
- v. When an adaptation to your current home is not practical for example, if you live on a hill and the steep gradient means a ramp or a step lift cannot be installed.
- vi. If it's not reasonable to adapt. This may be the case where there are major hazards in the home such as: overcrowding, excess cold, dampness.
- vii. If an OT/Assessor determines it's not necessary or appropriate to adapt a home.

4.15.1 If a disabled person wishes to move, rather than adapt their property, the Access team, Therapy colleagues, CHL, CHS and RPs will proactively support the relocation and signpost people to appropriate information and advice.

- 4.15.2 Due to the shortage of adapted/accessible homes the Assessor will consider relocation Cornwall wide. When determining whether relocation is an appropriate option account will be taken of a person's circumstances including the needs of the disabled person, their carers' and family to ensure the outcome does not create difficulties. The following factors will be considered:
- i. Any established local support network, the degree of support provided and whether this would be significantly reduced if the customer were to move away
 - ii. Any impact on care provision, both informal and formal care
 - iii. The location of the existing home and its access to local amenities such as GP, shops, clubs, transport links, which the customer uses
 - iv. In the case of a disabled child, where the child is settled into local schools or has non-disabled siblings settled in local schools
 - v. Any issues that may restrict choice such as the need to secure shared ownership, employment issues etc.
- 4.15.3 If after considering the factors above the Assessor and the disabled person consider relocation is the most appropriate solution the Assessor will make a referral to CHS/CHL to explore the feasibility of suitable alternative accommodation. The Assessor may recommend adaptations or equipment to manage and reduce risks until suitable accommodation is secured.
- 4.15.4 CHS or CHL will provide information and advice on how to find a more suitable property. Most will be able to manage their own move with the information provided. Some RPs also provide support and advice to help tenants relocate.
- 4.15.5 The Homechoice register provides information on accessibility features within the social housing stock. This should help disabled people find accessible properties in locations that are right for them. It should also help increase awareness of accessible and adapted housing.
- 4.15.6 For those seeking social housing they will be advised to register with Homechoice the Council's Housing Register and may be eligible for a personalised service from Homechoice team via the Assisted List. The services include:
- i. Regular contact to discuss accommodation needs
 - ii. Help with completing paperwork

- iii. Assistance with bidding on properties,
 - iv. Referring clients to the Access Team or MARU for an OTs assessment which will be used to provide supporting information to the Welfare Panel to inform banding priority.
- 4.15.7 For wheelchair users who register on Homechoice and require a property suitable for wheelchair use indoors and out, additional support will be offered by CHS. This support will include:
- i. Regular contact to discuss accommodation needs
 - ii. Help with completing paperwork
 - iii. Assistance with bidding on properties
 - iv. Arranging OT assessment on current home to inform Welfare Panel and banding priority
 - v. Being an advocate for the client at Welfare Panel
 - vi. Arranging OT viewings to establish suitability of any proposed new property and to advise whether the property requires aids, equipment and/or adaptations
 - vii. Supporting a client until that client has successfully relocated
 - viii. Liaising with social care colleagues to ensure appropriate package of care (POC) can be provided within the new home;
 - ix. Organising practical support during the move
- 4.15.8 For people with sensory impairment, people with learning difficulties, people with deteriorating illness and people with mental health needs, the Homechoice Team and CHS will engage with relevant professional agencies/support workers/carers etc to ensure that the support provided is inclusive and enables the person to make choices.
- 4.15.9 The Council has exercised its discretion to make use of powers to provide discretionary assistance in the form of a Relocation Support Grant (RSG). The RSG will help meet the costs of relocating to a new home when a person's existing home needs major adaptations to meet their needs, they're eligible for DFG/HRA assistance and an OT has recommended relocation is a more cost-effective solution than adapting.
- 4.15.10 RSG will be funded from the DFG capital programme and will be available across all tenures (including CC tenants moving from a CC property to another social housing landlord property or into another CC property). No grant ceiling is adopted but the work must be deemed reasonable by officers from CHS. RSG will be available for the following purposes:

- i. Legal costs,
- ii. Estate agents' costs,
- iii. Furniture removal costs
- iv. Vinyl flooring to essential rooms/facilities for wheelchair users.
- v. Council Tax if there is a need to pay on both the old and new home. Officers will support applications for Council Tax Discount where eligible.
- vi. Storage of furniture
- vii. Costs associated with transport to attend property viewings such as accessible taxi
- viii. Costs associated with an OTs Assessment & Statement of need advising how the new home meets the needs of the applicant or if needs aren't met what adaptations would be required to meet needs.
- ix. Void costs; funding to both social and private landlords to cover loss in rent where a home is being kept void waiting for adaptations to be undertaken prior to relocation of the tenant.¹⁶
- x. Help to claim additional Housing Benefit to cover costs for both the old and new home
- xi. Costs associated with cleaning/decluttering which if not undertaken would prevent someone from occupying a property.

4.15.11 In some circumstances the nature or extent of works involved in an adaptation will be such as to make the property unsafe or detrimental to the health of the disabled person to continue living there whilst the work progresses. The OT and the Surveyor should consult with the disabled person and their carer about the best means of dealing with these circumstances.

4.15.12 Where the disabled person wishes to stay put the Surveyor will agree a phased programme of works and may wish to have part of the property sealed off from the works, so they can continue in occupation. CHS & CHL will select contractors based on their ability to work around disabled clients to minimise disruption to them, be considerate of their needs and allow people to stay in their homes. Sometimes the nature of the work means that disruption is unavoidable.

4.15.13 Where the period of significant disruption is expected to be only a few days then the disabled person may be able to stay with friends or

¹⁶ Funding is not available to fund rent in advance and/or deposits; the client will be supported to access charitable funding, loan schemes or Discretionary Housing Payments (DHPs) to help meet these costs.

family or take a holiday. The Surveyor and OT will discuss whether Social Services are able to fund short stay in a care home or a respite holiday.

- 4.15.14 Where more prolonged disruption is unavoidable then a temporary move to other accommodation will be considered. Cornwall Council or a partner RP may have stock available for such use. It may be that the stock available isn't accessible but provides access to essential facilities for a temporary period. Arranging such a temporary move is a complex and difficult business and practical support will be provided. An RSG may also be available to fund the cost of such temporary accommodation. The Council will explore all alternatives including family/friends and self-funding before agreeing to fund temporary alternative accommodation.
- 4.15.15 RSG is not available to those wishing to relocate because the property is overcrowded or unsuitable for any other reason. The use of RSG will be carefully monitored to ensure that people aren't under any duress to move. The monitoring will take account of feedback from service users.

4.16 Financial Assistance for energy efficiency measures and to address hazards in the home

- 4.16.1 **Gas Safe Charity Hardship Fund**, funding from Foundations Independent Living Trust (FILT) to reduce the causes of gas poisoning, fires and explosions and to identify problems where they occur by delivering practical assistance to vulnerable gas consumers in Cornwall. The type of work funded with a Gas Safe grant are gas safety checks, gas servicing, gas boiler repairs or work on gas cookers, fires, pipework or water heaters. Cornwall Home Solutions will arrange for a local Gas Safe contractor to carry out the work. For eligibility please see Appendix 4.
- 4.16.2 **Home Safety Grant** for 'vulnerable' owner occupiers (including park home owners) to fund works to remove or reduce hazards in the home such as: provision of affordable heating & home insulation to address excess cold, removing trip hazards to reduce falls, provision of smoke/heat detectors & sprinklers to reduce risk of injury in the event of a fire. This is not an exhaustive list and an officer from CHS will identify hazards in the home that are eligible for assistance. Occupants of the home must be over the age of 60 or be disabled or have a limiting long-term illness. Any monies paid are repayable in full to the Council in the event of a change of ownership or breach of

occupation conditions. Where possible there will be a charge registered against the property for ten years to enable the Council to recover the grant. See Appendix 4 for eligibility criteria. Hazards within CC stock, the social housing and private rented stock will be addressed by the landlord via the duty under Decent Homes. The applicant will be subject to a test of resources known as a 'means test'. The means test will determine whether the grant should be reduced.

4.17 Handyperson Service

The Handyperson service is available to people who are over 60 or have a disability (including parents of disabled children) across all tenures including CC tenants. Anyone in receipt of a means tested benefit, such as Guaranteed Pension Credit or Housing Benefit will be charged £12 per hour including VAT plus the cost of any materials. For those who aren't in receipt of any means test benefit the cost is £18 per hour including VAT plus the cost of material.

4.17.1 The Handyperson service offers the following help:

- i. Small building repairs, clear guttering on bungalows, small glazing jobs
- ii. Equipment and small adaptations (installation of grab rails, hand rails or temporary ramps)
- iii. "Odd" jobs (putting up curtain rails and shelves, moving furniture, assembly of flat pack furniture)
- iv. Changing washers or taps, renew sealants, replace toilet seats, small areas of tiling, unblock sinks
- v. Fitting smoke and carbon monoxide detectors
- vi. Replacing electrical fittings such as sockets, light fittings
- vii. Securing loose carpets or putting up grab rails
- viii. Fitting key safes, spy holes, window and door locks and chains
- ix. Installing low energy light bulbs, draught proofing
- x. Loft clearance to allow for insulation to be fitted
- xi. Cleaning pathways to minimise risk of slip hazard
- xii. Signposting clients to other services

4.17.2 The service can provide general home safety checks, security checks and falls/accident prevention check for free.

4.17.3 The service is a preventative service and sometimes receives referrals from social care (ASC and CSF service). Where the HP receives such referrals the service and cost of the equipment to meet that need will

be provided free of charge. This is in accordance with Regulations¹⁷. The costs will be met by ASCH or CSF depending on which service made the referral.

4.18 Procurement of Work

Delivery of building works is undertaken by external contractors. CHS has introduced modern methods of procurement and have established processes for the procurement of the most common type of adaptations; stairlifts, modular ramping and bathroom adaptations. These enable the council to award work direct to a professional contractor without the need to seek quotes and so reduce waiting times for the end customer.

- 4.18.1 A framework to provide bathroom adaptations has been established with product and labour rates agreed with local contractors. Orders are issued on a rotational basis to contractors and the framework sets timescales for the contractor to complete bathroom adaptation installation work for the customer. CHS hold an annual Operational Contract Review Meeting with framework contractors and review and monitor performance throughout the year. Each installation is inspected by a team member to ensure work is of good quality and the customer happy with the outcome.
- 4.18.2 CHS have a service level agreement with a council company, Tremorvah Industries and have agreed the prices of stairlifts and labour rates. The company sub contract associated building work as and when required. The Occupational Therapist referrals for Stairlifts are sent to Tremorvah Industries who deal with the order from this point onwards, arranging the survey visit and installation directly with the customer. The streamlining of this process is to speed up delivery for the customer. CHS hold regular review meetings with Tremorvah management to monitor their performance and raise any issues highlighted by either team.
- 4.18.3 A contract has been awarded to Powerguard to provide all modular ramping. CHS commission the work along with all associated building work. A similar approach to the Tremorvah arrangement is adopted with Powerguard; CHS meet with the company director to review delivery of the contract periodically.
- 4.18.4 For works costing over £25K and which aren't covered by the contractual agreements detailed above three quotes are requested

¹⁷ Care and Support (Preventing Needs for Care and Support) Regulations 2014.

from contractors. This approach causes major delays and CHS aims to move towards direct award based on a schedule of rates.

- 4.18.5 All contractors undertaking work for CHS and its customers must sign up to a Quality Scheme Accreditation acceptable to CHS. All work must be completed to a high standard and meet the requirements set out in the specific contract specification, associated documentation and the schedule of work.
- 4.18.6 CHS support contractors when necessary to help them deliver the best possible service to customers. Specialist bathroom product suppliers offer toolbox training to promote and make contractors aware of the latest products and provide instruction on best way to install. Asbestos awareness training has been provided by CHS in house and by outside asbestos specialist contractors. To encourage contractors to take on the design of bathrooms CHS offer licences for the appropriate design software free of charge.
- 4.18.7 Contractors must always comply with and take reasonable steps to secure the observance of employees of the requirements of the Equality Act 2010 that legally protects people from discrimination in the workplace and in wider society.

4.19 Funding the Policy

Financial assistance offered by this Policy is provided from a range of funding streams, the main two being Disabled Facilities Grant (DFG) and the Housing Revenue Account (HRA).

4.19.1 Disabled Facilities Grant (DFG)

The DFG provides the main source of funding for home adaptations. The DFG budget is available for funding adaptations for home owners and for dwellings in the rented sector; both private rented and social rented. The Grant is given to local authorities with a statutory duty to provide adaptations under the Housing Grant Construction & Regeneration Act 1996 (HGCR Act). The DFG grant is mandatory for eligible applicants and the duty to approve a DFG cannot be avoided by reason of a shortage of resources.

4.19.2 Housing Revenue Account (HRA)

Local authority tenants aren't eligible for DFG and adaptations within Cornwall Council stock will generally be funded from the Housing Revenue Account (HRA). The exception to this rule is where adaptations are required on a CC void property to facilitate a relocation of an applicant from the Homechoice register.

- 4.19.2.1 The Council's Housing Revenue Account (HRA) is a ring-fenced budget that includes both the revenue and capital costs of managing the Council's own housing stock. There is a statutory duty to set an HRA budget and ensure that it is balanced or in overall surplus, and to determine the rent for Council house tenants each financial year.
- 4.19.2.2 The HRA Business Plan sets five-year detailed priorities and within this has committed to making sure that the adaptation needs of Council tenants are met, in an appropriate way, as they are for people living in the private sector. A budget of £1.2m each year has been included within the HRA business plan to address this and ensure that tenants assessed as needing adaptations can have them and maintain their independence.
- 4.19.2.3 There is no limit to the number of requests a tenant can make for an adaptation and eligibility will not be dependent on the available budget of £1.2m. The Council is committed to delivering on its statutory duty in relation to the provision of adaptations and if necessary will secure additional funding.
- 4.19.2.4 In addition, the HRA Business Plan seeks to take a more proactive approach in ensuring that council owned stock will meet future need and will plan to make certain types of properties suitable for prospective older and less able tenants by, for example, substituting bathrooms with wet rooms when they are due for replacement.
- 4.19.2.5 The new Cornish Housing Standard notes the following: "*We are proactively fitting level access / wet floor showers where we have ground floor flats within older persons accommodation or where this would be considered of practical benefit to the current tenants due to disability (in particular, bungalows with suitable access)*". During 2018/19 CHL have been adapting ground floor flats within Cat 2 'sheltered' type schemes, and wet rooms are now being installed instead of level access showers. This better provides for future adaption should the installation of a bath be required and reduces some of the additional cost whilst maintaining future flexibility.
- 4.19.2.6 The Cornish Housing Standard also commits to delivering adaptations to meet a tenant's assessed need and where this is not practical will look at alternative remedies.

5. Policy Management

A decision regarding eligibility for funding will be made by either CHS or CHL in accordance with this Policy.

5.1 Officers within these teams do the casework, undertake any test of resources, and provide technical services such as: surveys, designs, schedules, obtain planning consent, commission contractors and arrange funding of the work.

5.2 The Council accepts that there may be circumstances that warrant exceptions to this Adaptations Policy. The Head of Service for Cornwall Home Solutions and the Director of Homes & Investment are authorised to assess individual cases and will consult and decide whether an exception can be made to this Adaptations Policy. Where an applicant is unhappy with the decision a request can be submitted to the Service Director for Housing.

6. Breaches and Non-Compliance

Implementation of the Policy will be monitored by the Head of Cornwall Home Solutions, the Director of Homes & Investment Cornwall Housing Limited and the Head of Housing Strategy. Any deviation from the Policy will be reported to the Service Director Housing. In relation to performance of Registered Providers a report will be submitted to the Cornwall & Isles of Scilly Strategic Housing Group who are responsible for monitoring implementation of the MoU between RPs and Cornwall Council (Public Health).

7. Measuring Impact of Policy

The Service Standards set the expected levels of service for the installation of a housing adaptation and can be seen at Appendix 9. Setting service standards will help to ensure housing adaptations are delivered in a consistent manner, regardless of a service user's location and tenure, whilst giving flexibility to service providers to determine the best way to utilise their own resources to meet the standard.

7.1. These standards will be applied to all housing adaptations and will be relevant to:

- i. Cornwall Home Solutions
- ii. Registered Social Landlords
- iii. Cornwall Housing Limited
- iv. Occupational Therapists

- v. Healthcare and Social Service Professionals
- 7.2. CHS will keep the standards under review and may publish amended standards as appropriate.
 - 7.3. The expected timeframes have been split to reflect the following key phases:
 - i. The time it takes from a service user making first contact with a relevant Service Provider (this could be CHS, CHL, Housing Association or from their health or social services contacts) to being assessed by a competent person (such as Occupational Therapist or Trusted Assessor);
 - ii. The timescale from date of receipt of a report/referral/recommendation to the service provider (CHS/CHL) outlining the adaptation works required to date of approval/decision.
 - iii. The date of approval/decision to when the adaptation is confirmed as needed to installation (practical completion).
 - 7.4. The Disabled Facilities Grant is often criticised for being slow and bureaucratic. Targets have been set that reflect the scale of the work and includes the whole process from initial inquiry to completion.
 - i. Medium adaptations Target 26 weeks (182 days)
 - ii. Large adaptations Target 70 weeks (490 days)
 - 7.5. Medium Adaptations covers some modifications or changes to the home (but not those requiring planning permission or structural changes) and includes items such as:
 - i. Level access shower
 - ii. Stair lifts
 - iii. Ramps
 - iv. Door entry systems (costing more than £1,000)
 - 7.6. Large Adaptation includes significant adaptations to the home which may involve structural changes, and could require planning permission, and includes works such as:
 - i. Building an extension, for example to provide a downstairs bedroom and/or bathroom;
 - ii. Platform lifts such as a through-floor lift, step lift, linear lift;

- iii. Significant internal structural modifications, for example to relocate bathroom or kitchen.

7.7. Common data will be collected irrespective of the source of delivery or funding for the adaptation required. This will be used to evaluate the system and will inform any further developments. To ensure consistent application of the Policy there will be monthly reporting on the following:

- i. Proportion of referrals/recommendations for an adaptation that result in an adaptation per qtr.
- ii. Proportion of adaptations delivered within the required timescale as set out in the Policy standards.
- iii. Proportion of property nomination refusals due to an accessibility issue/bathroom not being suitable

7.8. Contractors will be monitored to ensure they maintain high standards of customer care. The following monitoring will be adopted by both CHS and CHL:

- i. Monitoring the level of variations by assessing increases in cost by contractor, the number of variations per job and the reasons for variations;
- ii. Monitoring whether contractors kept to appointments, kept the site tidy and controlled noise;
- iii. Formally recording the outcome of all post-inspections;
- iv. Providing formal feedback to contractors on their performance covering key issues such as client satisfaction, level and acceptability of variations, right first-time work, post-inspection assessment and completion within budget and on time.

7.9. Registered Providers need to provide permission for adaptations in their stock and are working with CHS to ensure that timely responses are provided. For most adaptations' permission will be granted within two weeks. For large adaptations such as extensions, permission takes longer to enable the RP to check specifications and plans and a target time of 3 weeks has been agreed.

8. Evaluation & Review

The Council values feedback from its customers as a valid method of monitoring trends and identifying areas for improvement. It gives the Council the opportunity to put things right where a customer has

experienced poor services and to identify areas where we are doing particularly well.

- 8.1.1 Both CHS and CHL have adopted a standard way of undertaking satisfaction surveys and evaluating outcomes, see Appendix 10 for copy of Customer Satisfaction Form.
- 8.1.2 Systems will be in place to:
- i. Routinely contact all service users as to their satisfaction with the process and undertake a customer satisfaction survey upon completion of the work;
 - ii. Undertake a random sample survey of customers after 1 year to review whether adaptation solutions continue to be appropriate and useful over time;
 - iii. Involve a standing group of service users in sharing in the review of survey responses and contributing to the design and evaluation of the whole adaptation service;
 - iv. Involve contractors in monitoring the system via regular e-newsletter and contractors' forum.
 - v. Involve Registered Providers in monitoring the system via a quarterly review meeting
 - vi. Review complaints and action 'lessons learnt'.
 - vii. Engage with Housing Options and Homechoice teams to review support provided to disabled applicants registered on HC and those who are at risk of becoming homeless

8.2 Complaints Process

The Councils complaints process deals with matters such as:

- i. Failure to provide a service.
- ii. Failure of a council policy.
- iii. Unreasonable delays in the provision of a service.
- iv. Failure to provide adequate standards of service.
- v. Failure to fulfil statutory responsibilities.
- vi. An employee's attitude or behaviors.

- 8.2.1 Cornwall Council's complaints procedure does not deal with:
- i. Queries about a service or service provision.
 - ii. Queries about progress with an application or an issue.
 - iii. [complaints against a councilor](#).
 - iv. Decisions of the council against which there is an appeal process (i.e. Applications for benefit, planning applications).

- v. Informal, day to day 'grumbles' that can be easily resolved.
- vi. Environmental control / planning enforcement issues / objections to planning applications.

8.2.2 For more information visit the council's website www.cornwall.gov.uk/complaints provides access to the Council's Listening and Learning Policy. It includes a feedback form for customers to send in their views.

8.3 Publication and circulation of Policy

The policy will be made available on the council's, CHL and partners' websites and a summary document available on request. It is subject to funding and confirmation of the transfer of funding to Housing via the BCF Disabled Facilities Capital Grant and a balanced HRA that can support the level of funding needed.

8.3.1 This policy will be reviewed after 12 months to establish that it is working effectively and having the required impact on the provision of adaptations to those in need and most importantly is supporting delivery of an equitable service across all tenures. Adjustments may be required to rectify any unintended consequences of this policy.

8.3.2 This policy will be reviewed thereafter as part of the regular review cycle (i.e. five years), or as required to consider any changes in legislation.

8.3.3 Any changes to the policy will be published on the council's website and a summary document available on request. The governance of the policy and the assistance given will be with the Housing Service. Annual performance reports will be subject to scrutiny at Housing SLT and be part of the annual strategic review.

Document information

Contacts

Policy prepared by Karen Sawyer, Head of Cornwall Home Solutions, Cornwall Housing Service.

Further information

Set out where to obtain further information

Alternative formats

If you would like this information in another format please contact: **Cornwall Council, County Hall, Treyew Road, Truro TR1 3AY**

Telephone: **0300 1234 100**

email: enquiries@cornwall.gov.uk

www.cornwall.gov.uk

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