

CROYDON COUNCIL HOUSING

# Aids and Adaptations Policy

The Aids and Adaptations Policy sets out Croydon Council's duties and responsibilities to provide assistance to our older or people with a disability, or people who have a long-term illness to enable them to live more independently and confidently at home and in their community.



Residents  
Reading  
Group

*Reviewed*

This policy was reviewed with the help  
of Croydon Housing Residents

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## 1. Purpose

- 1.1 This Policy sets out Croydon Council's duties and responsibilities to assist people to move into and around the home freely, utilise living and sleeping areas within their home, and ensure they have access to cooking, bathing, and toilet facilities suitable for their disability.
- 1.2 An adaptation is an alteration to an aspect of a dwelling to assist an older or person with a disability, or people who have a long-term illness, to live as independently as possible in their home.
- 1.3 A person with a disability is defined as having a physical or mental impairment that has a substantial and long-term negative effect on their ability to do normal daily activities (Equality Act 2010).

## 2. Statement of Intent

- 2.1 The Council is committed to providing an equitable, efficient, and accessible aids and adaptations service to support the needs of tenants with a disability within the constraints of the resources available.
- 2.2 All referrals for aids and adaptations will be considered individually, having regard to the criteria set out in this policy and the circumstances of the individual requiring the adaptations.

## 3. Scope

- 3.1 As part of the assessment process, other options may be considered, including the offer of a move to a more suitable property, where this is appropriate. The suitability of that property will be judged on the criteria contained in Part IV of Schedule 2 of the Housing Act 1985 (as amended).
- 3.2 For major and complex aids and adaptations to family homes we will encourage and assist with a move to more suitable accommodation if this is appropriate.
- 3.3 When a Croydon Council property with major adaptations becomes vacant, we will seek to find a housing applicant or existing tenant who needs the adaptations we have carried out to the property. Croydon Council will make use of our aids and adaptation resources to provide proactive and planned generic adaptations to properties deemed suitable for such works.
- 3.4 The Policy should be read in conjunction with:
  - Responsive Repairs Policy
  - Complaints Policy
  - Asset Management Strategy
  - Equality and Diversity Policy

## 4. Legal framework

- Equality Act 2010
- The Care Act 2014
- The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
- Health and Safety at Work Act 1974
- NHS and Community Care Act 1990
- Building Safety Act 2022
- Fire Safety Act 2021

## 5. Eligibility

- 5.1 A Council tenant and their partner or immediate family member who permanently resides in the household and has an impairment that is likely to last for at least 12 months, or the remainder of the person's life, that substantially affects their ability to carry out normal day to day activities or access facilities in or around their home.
- 5.2 Anyone can make a referral regardless of their tenure. They will be triaged by the duty desk, and they will either go to the Occupational Therapist (OT) area team for an assessment. or go straight to the Major Adaptations Unit (MAU) for an adaptation assessment.

## 6. How to make a request

- 6.1 Anyone over the age of 18 with care and support needs can ask for an assessment. A family member, carer, friend, or professional can do this on their behalf via the council's web site [Occupational therapy, equipment or adaptations](#)
- 6.2 Children can be referred to the Children's Occupational Therapy Service and will get adaptations if required. The contact number for the Children's Occupational Therapy service is 020 8274 6854
- 6.3 Requests for Occupational Therapy via the Croydon Council online portal [Adult with support needs](#) or via the link for [Professional referral to OT](#)
- 6.4 Information can be found on the Council website: - [Occupational Therapy and Equipment: helping you stay at home](#)

## 7. Minor adaptations

- 7.1 The Council will follow the guidance '[Adaptations without delay – A practical guide and technical specifications for housing associations](#)' produced by the Royal College of Occupational Therapists.

- 7.2 Minor adaptations (under £500) are easily installed and do not affect the future use of the property e.g., lever taps, grab rails, half step, and mop stick handrails.
- 7.3 Minor adaptations will be raised as routine repair jobs (i.e. up to 28 working days) as long as they do not exceed £500 in total value in one property)
- 7.4 The likely timeframe for completing minor adaptations may be less depending on critical need or if there are immediate risks to the health and safety of the occupants of the property.
- 7.5 The Council may seek an Occupational Therapist's assessment and recommendation on aids and adaptations requests below £1,000 in value on a discretionary basis, to ensure the proposed works meet the customer's individual needs most effectively.
- 7.6 Once Adult Social Care has completed an initial Occupational Therapist's Assessment with the resident (or if a re-assessment is required due to a change in need after a recommendation has been made to the Housing Team), the Adult Social Care Occupational Therapy practitioner will send the resident a copy of the updated assessment. The initial assessment will be provided to the resident as soon as it is received.
- 7.7 If an assessment is required, once agreed, the Council aims to ensure all minor adaptations are completed in a timely manner.
- 7.8 Minor adaptations do not include non-fixed equipment to assist with a disability or mobility problem that are normally supplied by the Council's Equipment Services.

## 8. Major adaptations

- 8.1. Major adaptations (typically over £1,000) are adaptations that meet needs identified through an Occupational Therapist referral. There are various types of major adaptations such as stairlifts, over bath showers, level access showers, electric opening doors, ramps, hoists, and adapted kitchens, where a member of the household is a wheelchair user.
- 8.2. The provision of an adapted kitchen does not include the provision of any appliances; these are the responsibility of the tenant to provide but they will be installed as part of the adaptation.
- 8.3. Approvals for major adaptations will only be made on receipt of an Occupational Therapist's assessment and clear recommendation that the work is necessary to sustain independent living, addressing basic needs only (with critical needs assessments receiving the greatest priority).
- 8.4. When evaluating a request for an adaptation, the Council will consider individual, technical, and other relevant factors to enable a balanced decision to be taken to ensure the best use is made of the available financial resources.

Adaptations need to be reasonable and practicable as well as necessary and appropriate.

- 8.5. Disabled Facilities Grant funding is available for private homeowners, tenants and housing association tenants. Adaptations for council tenants are funded through the Housing Revenue Account (HRA)
- 8.6. Wherever possible and suitable for a customer's circumstances, the Council will endeavour to facilitate approved requests for major adaptations through allocations or management moves to an alternative suitable property that meets their required needs. This will include consideration of the suitability of the property, where factors such as floor level and under-occupation of the property will be considered. For example, if a single household requires an adaptation, but is occupying a larger family home, a transfer to a more suitable property is likely to be more appropriate.
- 8.7. The Council will inspect all major adaptations on completion to ensure that the work has been undertaken professionally and to check that the resident is satisfied with the work.

## 9. Permissions and refusal

- 9.1. Adaptations need to be reasonable and practicable as well as necessary and appropriate. If further medical evidence is required to support a client's request, the Occupational Therapist's will request this from the relevant professional when required, and will where appropriate undertake a risk assessment (i.e. if we are recommending a through floor lift and the client wants a stairlift the Occupational Therapist will obtain further information on the medical condition that has led to the decision of the through floor lift (i.e. stroke, MS, dementia etc.) and will carry out a stairlift risk assessment.
- 9.2. The Council will consider the following criteria when prioritising permissions and provide funding for major adaptations:
  - There is a completed Occupational Therapist referral with all relevant information to make a full assessment.
  - The work requested is to assist in meeting a long-term medical condition that is likely to continue in the near future.
  - The Occupational Therapist's eligibility criteria to decide if they have priority needs.
  - Additional priority may be given where the requirement for adaptation is causing a current health and safety or fire risk.
- 9.3. The Council reserves the right to refuse the request for a major adaptation on the following grounds:
  - Where the adaptation is requested in a property that is due for demolition or major refurbishment within two years.
  - The property is unsuitable for adaptation.

- The adaptation is considered unreasonable and unsuitable for the tenant's needs.
- The request is to address specialist needs other than basic needs (Example of specialist needs: self-washing or changing facilities).
- The request affects other areas of health and safety i.e., fire safety.
- The adaptation requested is unlikely to meet the needs of a progressive condition or ongoing health needs.
- Tenants can be assessed and recommendations made, however adaptations may not be able to proceed if tenants are in persistent rent arrears and are subject to a current anti-social behaviour order or injunction action against them. The Council may on a discretionary basis waive this condition in cases of critical need or where there are immediate risks to the health and safety of the occupants of the property.
- Tenants who have applied to the right-to-buy (RTB) can apply once the property purchase has completed. The Referral will be reassessed if the RTB is withdrawn.
- If there is a current transfer application in place, we will consider the application and advise if the housing transfer should be cancelled before any orders are raised for adaptations.
- Where the building structure is considered integrally unsuitable for technical and practical reasons, for example widening doorways in prefab buildings, wet floor showers in beam and block floors, etc.
- Where the tenants' needs may be met by a more reasonable solution. Particularly where the client has requested an extension or major works the tenant's needs will be assessed and consideration given to applying alternative solutions, for example utilising a ground floor dining room as a bedroom.

## 10. Complex adaptations

- 10.1. Complex adaptations require work that is more extensive e.g., major remodelling, widening of doors, off-road parking, and extensions, and are often designed for the specific needs of the individual. These works are of high cost and affect the future use of the property.
- 10.2. Upon receipt of the Occupational Therapists report, a feasibility assessment will be carried out in consultation with the Occupational Therapist, along with a member of the Council's MAU Team, Tenancy Officer, Housing Allocations Team, and Asset Planning and Capital services.
- 10.3. The feasibility assessment will seek to establish:
  - If the adaptation works are suitable for the tenant's disability.
  - The feasibility of the adaptation in relation to the layout and structure of the property.

- The proposed works meet all planning, estate management, and building regulation requirements.
- Works that will be self-funded by the tenant.
- The implications of the adaptation work when the property becomes available to re-let, in particular the impact on future allocations and under-occupancy issues.
- If there is a possibility for the tenant to be moved to more suitable accommodation if they are happy to do so.

10.4. Where a move to a more suitable alternative or already adapted property is offered and refused, approval of the complex adaptation will be subject to review by Formal Adaptations Panel attended by an Occupational Therapist lead.

10.5 Where a move to a more suitable property has been identified as a viable option, the Council may take this into account when considering whether to approve adaptations for the current home, and in some cases, may advise that the tenant considers relocation as a more appropriate course of action.

10.6 In situations where a suitable alternative or already adapted property is offered and refused, approval of the complex adaptation will be subject to review by the Formal Adaptations Panel attended by An Occupational Therapist clinical lead, representatives from Asset Management, Staying Put and the Grant Surveyor with an Allocations manager if appropriate and a move to a more suitable property is being discussed.

## 11. Moving to a more suitable property

11.1. For tenants with a disability who are downsizing, we may be able to offer help to people who need financial assistance/help and/or support with the moving process. Each case will be looked at individually and the assistance/support will be tailored to individual needs.

11.2. Where circumstances allow, we may also offer:

- Staff time to help tenants through the process with issues such as arranging removals, reconnection of gas and electricity, and other practical issues.
- Extra support via our tenancy support service for some tenants who may need extra support

## 12. Legal compliance

12.1 The Council will comply with the relevant legislation regarding the provision of an aids and adaptations service.

12.2 While the Equality Act 2010 does not require landlords to make physical alterations to the structure of residential properties, the Council remains committed to meeting its duties under the Act, and under other relevant

legislation to promote independent living for residents who have a disability or require aids or adaptations and make reasonable adjustments where necessary.

- 12.3 The Council will ensure that no person nor group of persons will be treated less favourably than another person or group of persons and will carry out our duties in line with the Council's duties under the Equality Act.
- 12.4. The Council will ensure that the service is delivered and adhere to the central principles of the Human Rights Act (1998)

### **13. Financial considerations**

- 13.1 The Council will set an annual budget identified for Aids and Adaptations, which will be used as efficiently as possible to provide a fair and accessible service to all tenants, whilst demonstrating value for money.
- 13.2 For all adaptations, the Council's Contract Procurement Procedure must be followed to ensure that governance is maintained within the Council, and that Approved Officers obtain the Best Value services and Value for Money from purchasing arrangements.
- 13.3 Adaptations for clients in council properties are facilitated by the Major Adaptations Unit. However, council tenants can also apply for a means tested Disabled Facilities Grant should they choose to. The Council does have its own funds from the housing revenue account that can be used for adaptations.
- 13.4. Adaptations for non-council housing clients require a means-tested Disabled Facilities Grant (i.e. homeowners, private tenants and housing association tenants) they will be referred to the Councils Staying Put team upon meeting the relevant criteria for adaptations.

### **14. Use of adapted properties**

- 14.1. It is expected that once major adaptations have been completed, the tenant will continue to live in the property unless circumstances do not allow for this (such as a worsening medical condition).
- 14.2. Where substantial works have been carried out to the property and the person requiring the adaptations dies or is unable to remain at the property and moves elsewhere, the remaining members of the household may be asked to move to alternative accommodation.
- 14.3. If a customer applies for re-housing or mutual exchange, unless their circumstances have changed, they will normally be classed as adequately housed and therefore will not qualify to join the housing needs register.

### **15. Disability registers**

- 15.1 The Council must keep a register of properties that are purpose-built or have been subject to significant adaptation works together with details of the works carried out.
- 15.2 We maintain accurate and up-to-date asset management data with relevant information about major aids and adaptations. These details are available to inform the management of allocations and lettings, and the maintenance of the adaptation itself.

## 16. Letting adapted properties

- 16.1 Where a property with major adaptations becomes vacant, we will generally advertise the property through the choice-based letting scheme to find an applicant who needs the adaptations.
- 16.2 If a property has specific or extensive adaptations, a decision may be made not to advertise the property but to make a direct offer to an applicant or existing tenant who needs the adaptations.

## 17. Equality including disabilities discrimination

- 17.1 The relevant law on disability discrimination in England, Wales, and Scotland is the Equality Act 2010, which replaced and consolidated earlier legislation, including the Disability Discrimination Acts
- 17.2 Disability is a 'protected characteristic', which means it is within the scope of equality law. A person has this protected characteristic if:
  - they have a physical, sensory, learning, or mental health impairment, and
  - the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.
- 17.3. This definition covers a variety of conditions, including impairments that are not visibly obvious, and ones that recur sporadically.
- 17.4 It is unlawful to discriminate against any person "because of" the protected characteristic of disability. This can extend to protect people associated with people who have a disability (e.g., carers).
- 17.5 It is also unlawful to discriminate indirectly against people with a disability. Indirect discrimination occurs when, for example, a policy is applied generally but it puts people with a disability at a particular disadvantage without reasonable justification.
- 17.6 If a person with a disability is treated unfavourably because of something arising in consequence of their disability (rather than their disability itself) and this cannot be justified, it may amount to unlawful discrimination.
- 17.7 The Equality Act 2010 creates a positive, anticipatory duty to make reasonable adjustments for people with a disability. The duty requires the Council, service providers, and others to whom the Equality Act 2010 applies to anticipate the

needs of people with a disability, and, to the extent that it is reasonable to do so, take steps to ensure those needs are met. This includes ensuring information is provided in an accessible format.

- 17.8 The Public Sector Equality Duty replaced the disability equality duty contained in [section 49A](#) of the Disability Discrimination Act 1995. It requires public authorities, when exercising their functions, to have due regard to various equality considerations, including advancing equality of opportunity between people with a disability and people without a disability.
- 17.9 There is currently no duty under the Equality Act 2010 on a landlord to make structural changes to a rented property. There is a duty on the Council to make reasonable adjustments where a provision, criterion, or practice puts a person with a disability at a substantial disadvantage compared to a person without a disability.
- 17.10 The Equality Act 2010 provides the basis for a requirement to make disability-related alterations to the common parts of let residential premises, or premises owned on a commonhold basis. These provisions are not in force.

## 18. Reasonable adjustments

- 18.1 The Council has a duty to make reasonable adjustments for people with a disability. The duty requires Council staff, service providers, and others to anticipate the needs of people with a disability and take steps to ensure their needs are met.
- 18.2 Current landlord duties remain under **Sections 20–21** (reasonable adjustments within the property), but **common parts adjustments are still not a legal requirement** until Section 36 is enacted
- 18.3 The duty is described in Equality Act 2010 [section 20](#) and comprises three requirements. The requirements are to “take such steps as it is reasonable to have to take” to:
- avoid putting people with a disability at a substantial disadvantage where a provision, criterion, or practice would put them at that disadvantage compared with people who do not have a disability - for example, adjusting a ‘no dogs’ policy for visually impaired who may require guide dog.
  - remove, alter, or provide means of avoiding physical features where those features put people with a disability at a substantial disadvantage compared with people who do not have a disability – for example, providing a wheelchair ramp alongside stairs
  - provide an auxiliary aid where people with a disability would, but for the provision of that aid, be put at a substantial disadvantage in comparison with people who do not have a disability – for example, providing an induction loop for hearing-impaired people

- 18.4 The Council has taken steps to ensure people living with a disability have access to information – for example, print size, re-design the appearance of literature, and audio, using clear language for people with hearing impairment and learning disabilities, or for people for whom English is a second language.
- 18.5 We can provide support if someone needs assistance making an application.
- 18.6 For further information follow refer to the Councils Reasonable Adjustment Policy

## 19. Implementations

- 19.1 All council staff have a responsibility to be aware of the Aids and Adaptations Policy and to signpost any customer queries that may arise to the Social Services/OT team, rather than directing these to the MAU.
- 19.2 Decisions related to extensive alteration (on the recommendations of the Occupational Therapist's reports and subject to budget/resource availability) must be approved by the Asset Manager and where necessary, a member of the operational housing team.

## 20. Review panels for major adaptations

- 20.1 The Formal Adaptations Panel meet weekly to discuss referrals that are complex, and adaptations which are expected to exceed £30,000.
- 20.2 The OT PEER Forum meets weekly to discuss and make decision on complex referrals and adaptation requests for works that are straightforward and under £30,000 i.e., wet room showers, ramps, stair lifts, and lifting equipment.

Meeting:	Frequency:	Attendees:
Formal Adaptations Panel	Weekly	Principle OT
		Clinical Lead
		Operational Manager – Staying-Put
		Grants and Loans Surveyor
		Asset Manager or delegated surveyor
Peer Forum	Weekly	2 x OT's

## 21. Performance

- 21.1 Service standards and Key Performance Indicators (KPIs) are monitored at monthly contract monitoring meetings, held between the Building Surveyor responsible for day-to-day operations, the contractor responsible for the works, and other members of the Asset Management Team.
- 21.2 Housings Head of Voids, Lettings and Adaptations has overall operational responsibility for the aids and adaptations service.

## 22. Appeals

- 22.1 Once a decision has been reached on whether an adaptation is to be provided, the tenant will be advised in writing. The tenant has the right to appeal the decision within 21 calendar days, by resubmitting their application, stating why they believe the decision is wrong. Additional, sufficient medical evidence should be provided to support the appeal.

## 23. Complaints

- 23.1 Any person who is not satisfied with the way the Council or its contractor(s) has dealt with the service they have received regarding the Aids and Adaptations service, has the right to have their case investigated via the [Council's complaint, policy and procedure](#) web site.

## 24. Data protection

- 24.1 When a tenant makes an Aids and Adaptation request or complaint, we will log information, their name, and contact details. Information will only be collected and stored for the purposes of dealing with the request, or complaint to improve our services. The complaint and details will be treated confidentially.
- 24.2 When you make an appeal and complaint, we will log the information, your name, and contact details. Information will only be collected and stored to deal with your complaint and improve our services. Your complaint and details will be treated confidentially.
- 24.3 All complaints are treated confidentially. Notwithstanding the [Freedom of Information Act 2000](#).
- 24.4 Please refer to the [Council Data Protection guidelines](#)

## 25. Responsibility

### 25.1 Director of Housing Management will:

- Appoint a Responsible Person/Persons to oversee the implementation of this policy regarding properties for which they are responsible.
- Ensure that resources are made available to allow the actions and measures detailed in this Policy and any associated procedures to be effectively delivered.

### 25.2 Head of Responsive will:

- Implement the policy in respect to domestic premises and tenanted premises, reporting progress and meeting any target KPIs agreed upon.

### 25.3. Head of Asset Planning & Capital delivery will:

- Work closely with the Compliance team to seek assurances that obligations under industry guidance and the procedure measures are being adhered to and services are delivered in line with budget.

**25.4. Compliance Manager will:**

- Be responsible for compliance performance (KPI reporting to the Director of Repairs and Assets)
- Ensure that any compliance and/or H&S-related issues are brought to the attention of the Directors within Housing and Repairs and Assets

**25.5 Electrical Contract Manager will:**

- Be responsible for the day-to-day operational delivery of all electrical testing.
- Manage the performance of the service delivery Service Providers, including their ongoing competence, and proactively monitoring service delivery against targets.
- Monitor the quality of work undertaken by the Service Provider and ensuring all certification is received and verified.
- Act as the organisation's technical lead for electrical safety, ensuring that the Council continues to work in line with the most up-to-date regulations and industry guidance.

**25.6 Service Providers will ensure:**

- All appointed electrical Service Providers must be registered with the NICEIC (or equivalent) and shall be registered under a recognised Domestic Installer self-certification scheme in compliance with Schedule 3 of the Building Regulations 2010.
- Service Providers undertaking electrical work will work in accordance with the Health and Safety at Work Act 1974, the Electricity at Work Regulations 1989, and all other current relevant legislation and approved codes of Practice.

**25.7 Tenants will:**

- It is the tenant's responsibility to allow the Council to undertake the Aids and Adaptations installations, inspections, and testing, and in doing so they should be aware that it may be necessary to temporarily de-energize the electrical supply to the property.
- The Council is not responsible for the safety of residents' aids and adaptations not provided by the Council or installations that have been installed without our prior approval.

## **26. Monitoring and review**

26.1 This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council-wide policies.

## 27. Impact assessment and stakeholder consultation

27.1 An impact assessment on our adaptation policy has been conducted during the consultation process.

27.2 Stakeholders with responsibility and operational knowledge of Aids and Adaptations, have been consulted during the development of this policy. The consultation has been carried out through the different management levels before seeking approval from the H&S Board.

## 28. Document control

28.1 This is a controlled document and should not be changed unless by authorisation of the policy holder.

Monitoring		
Approved Date:	27.02.2026	
Next Review Date:	February 2029	
Effective date:	27.02.2026	
Consultation Review		
Stakeholders review:	28.11.2025	
Legal review date:	28.01.2026	
Residents reading group:	14.12.2025	
Policy owner:	Director of Housing Management	
Ratified by:	By Housing DMT	
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.	
Version History		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Developed with Housing subject matter experts, Foundation, and our residents reading group