



EDEN HOUSING ASSOCIATION

AIDS & ADAPTATIONS POLICY

Document Reference Number:	PROP03
Document Owner:	Director of Operations
Approved By:	Executive Team
Approved Date:	9 July 2026
Policy Implementation Date:	15 July 2026
Revision Cycle:	3 years (or when legislation changes)

This policy applies to Eden Housing Association and all its wholly owned subsidiaries, including Mitre Housing Association

Review/Amendments Record

Date	Change by	Summary of Change
13.7.18	Caroline Leonard	Addition of Review/Amendments Record
19.9.19	Michelle Collins	Reviewed following Scrutiny review. Changes to the value of minor work and EIA review on the policy. Separate Policy from Procedure and now two documents.
12.1.22	Jenny Everingham	Light touch review – checked with Housing & Property Managers. Still fit for purpose. Added note re engagement and history of policy.
04.12.23	Jenny Glassford	Changes made in relation to warranty and service charges.
June 2026	Stella Eggleston	Change of roles in relation to new structure Updated legislation Addition of timescales Consultation with SQHP Addition of refusals, complaint and right to review

1. POLICY STATEMENT

- 1.1 Eden Housing Association (EHA) is committed to meeting the needs of its tenants for independence, privacy and dignity. We aim to help people continue to live independently and comfortably in their homes for as long as possible, with the minimum intrusion or intervention.
- 1.2 A budget is allocated for carrying out minor adaptation works each year and, in addition grant applications will be made for Disabled Facilities Grants from the local authority for major adaption. This ensures that the maximum possible number of adaptations can be carried out. We will ensure our processes are cost effective and represent value for money.

2. REFERENCES

Internal

- EHA Safeguarding Children and Adults Policies
- EHA Data Protection Policy
- Repairs and Maintenance policy
- Asbestos Management policy
- Equality and Diversity Policy
- Asset Management policy
- Cumbria Choice Allocation Policy
- Health and Safety Policy
- Loler Plant and Lift Servicing Procedure
- Planned Works Procedure

External

- RSH Consumer Standards 2024
- Landlord and Tenant Act 1985
- Equality Act 2010
- Housing Grants, Construction and Regeneration Act 1996
- Disabled Facilities Grant (England) Framework
- Home Adaptations for Disable People (a detailed guide) 2015
- Human Rights Act 1998
- The Care Act 2014
- Mental Capacity Act 2005
- Health and Care Act 2022
- Chronically Sick and Disabled Persons Act 1970
- Social Housing (Regulation) Act 2023
- Housing Ombudsman Complaint Handling Code

3. POLICY CONTENT

- 3.1 This policy covers all EHA general needs, assisted living and extra care homes and their respective tenants and households.
- 3.2 EHA will act in accordance with the Equality Act 2010 and will take reasonable steps to remove barriers experienced by disabled people, making reasonable adjustments where appropriate.

- 3.3 EHA will also co-operate with relevant authorities to provide an adaptations service that meets tenants' needs, as required by the RSH Consumer Standards.
- 3.4 Where an applicant can fund the adaptation themselves or has access to third-party funding (including local authority funding) written permission must be obtained from EHA before any works are started. Permission will not be unreasonably withheld and decisions will take account of property suitability, health and safety concerns, ongoing maintenance requirements, value for money and legal obligations.
- 3.5 EHA will rely on information from the local authority in terms of access to funding / savings for an individual household. Where an applicant has been found to have the means to pay for an adaptation themselves, then EHA will contact the applicant direct to make sure they understand the requirements.
- 3.6 Where EHA funds all or part of an adaptation, this policy provides the framework within which decisions will be taken.
- 3.7 EHA takes a person-centred approach to providing adaptations in our homes. We recognise that an adaptation is not just a matter of equipment and building work, but is about people and how a living environment can be adapted to better meet needs.
- 3.8 EHA will clearly communicate to tenants and relevant organisations how we will assist tenants seeking an adaptation service. We endeavour to involve our tenant / household at each stage of the process and to respect their input.

3.9 BUDGETS

- 3.10 EHA will set an annual budget for minor aids and adaptations work. Minor adaptations are considered to cost less than £1,000 inclusive of VAT. Spend against this budget will be regularly monitored and reviewed as necessary.
- 3.11 EHA will set an annual budget for contributions towards more major adaptation work. Whilst EHA would normally seek Disabled Facilities Grant or other external funding for major adaptations, each request will be considered on its individual merits, including the Association's obligations under the Equality Act 2010.

3.12 EXCLUSIONS

- 3.13 Adaptations will not normally be paid for in any home where

- The occupancy is temporary in nature
- The property is leased from a head landlord.
- The costs exceed £1,000

3.14 MINOR AIDS & ADAPTATIONS

- 3.15 Minor adaptations will be managed by the Repairs & Maintenance Team. They're typically classed as smaller works which do not usually require an Occupational Therapist Assessment, although the Association may request guidance on the location/measurements.

Minor Adaptations include works such as grab rails, lever taps, half-steps, handrails, flashing doorbells or fire alarms etc.

- 3.16 We aim to complete minor adaptations within 20 working days and will prioritise earlier completion where we're able to.

3.17 MAJOR ADAPTATIONS

- 3.18 Major adaptations are managed by the Asset Team. They're typically works that cost over £1000 and must be supported by appropriate grant funding. Major adaptations include:

- Level access showers / wet rooms
- Lifts/ hoists
- Ramps / modular ramps
- Adapted kitchens / padded rooms

- 3.19 Tenants should seek an assessment from the occupational therapy (OT) team at the local authority to determine whether or not an adaptation is required or appropriate to meet their needs.

- 3.20 The local authority will assess any referral from OT colleagues to consider a disabled facilities grant award. An onward referral will then be made to EHA to consider.

- 3.21 EHA will consider all DFG / major adaptation referrals and will provide a written decision confirming whether consent is granted, refused, or deferred pending further information, funding or rehousing options. Where a request is refused or delayed, the reasons will be explained clearly to the tenant together with the next steps, review route and complaints route.

- 3.22 EHA will work with the local authority to agree the scope and specification of the work, aligning components used in the adaptation with those used on planned programmes to assist with standardized repairs wherever possible.

- 3.23 All major adaptations will be reviewed by a member of the asset team whilst work is on site, and will be inspected to confirmation satisfaction with work quality on completion.

- 3.24 We aim to meet the following timescales when working with requests for major adaptations. Where these timescales cannot be met, we will keep the tenant informed, explain the reasons and provide revised timescales:

Acknowledgement of request and assigned contact	Within 5 working days
Decision on approval or refusal of adaptation request	Within 3 weeks of receipt of all relevant information and assessments
Completion of works	Up to 12 weeks (depending on extent of works)

- 3.25 We will allocate a named member of staff to oversee each major adaptation, and to act as a single point of contact for tenant and stakeholders.

- 3.26 On completion of any installation requiring ongoing maintenance (eg lifts, automated toilets etc) the Property Compliance department will be updated and provided with the relevant warranty documentation.
- 3.27 Lift installations completed by the local authority usually come with a 5-year care package where all servicing is covered. For the duration of this care package, the tenant will need to liaise with the local authority and relevant service provider to arrange access for servicing. EHA will maintain oversight of servicing requirements and work with tenants to ensure servicing is undertaken.

3.28 REHOUSING AS AN ALTERNATIVE

- 3.29 EHA have regard to the longer-term letting and value of properties when considering requests for major adaptations and may refuse to undertake, or give consent for works which may make the future letting of the property problematic or not financially viable.
- 3.30 In some circumstances where funding from the Association has been requested, it may be reasonable to meet the applicant's needs by asking them to consider a move to another home. Examples of this may include: Where it would be easier and/or more cost effective to provide the adaptation in another location, e.g. another home already benefiting from the adaptation is, or is likely to be, available to the applicant within a reasonable period of time, or carrying out the work in the applicant's current home is likely to lead to significant further costs either now or at a later date.
- Where rehousing is proposed as an alternative to adaptation, EHA will consider the tenant's wishes, medical needs, likelihood of a suitable alternative becoming available and the impact of any delay. Adaptation requests will not be deferred indefinitely pending rehousing
 - Where it is considered likely that the applicant will need to, or wish to, move to other accommodation within the foreseeable future in order to meet their longer-term housing needs.
 - Where the applicant is under-occupying their current home and it is considered likely that there would be demand for the home from other larger households.
 - In all such circumstances, the option of a move will be discussed with the tenant and their views will be fully taken into account before a decision is made. Assistance with the transfer process will always be provided where required.
 - Where the applicant does not wish to move but the Association regards a move as reasonable, a multi-agency approach will be undertaken with OT's and Local Authority.
 - In all cases where a move is agreed with the applicant or is considered reasonable by the Association, a period of time will be agreed or determined

for a suitable move to be identified, following which a full review of the application will take place.

- The purpose of this aspect of the policy is to ensure that where a decision or an adaptation is deferred pending a move, that there is a reasonable prospect of such a move being identified within a reasonable period of time.

3.31 PARTNERSHIP WORKING

3.32 As part of our commitment to our tenants and the Social Housing Consumer Standards, we work in partnership with the local authority (and support providers where required) to provide additional funding and support to ensure that the needs of tenants in relation to adaptations are met, within the constraints of available funding.

3.33 EHA will also work with Occupational Therapists, Social Services and other external agencies to deliver a quality service under professional advice.

3.34 MAXIMISING THE VALUE OF INVESTMENT IN ADAPTATIONS

3.35 EHA will endeavour to ensure that, wherever possible, aids and adaptations are utilised when re-letting a property and will undertake a case-by-case assessment before removing major adaptations, considering future demand, cost of retention, safety requirements and VFM. It is likely in light of challenges around lift warranties and safety concerns that lifts will be removed on void unless there is an exceptional circumstance to support their retention. Liaison with any current adaptation recycling scheme will be had at the time before removal is instructed. Customers in need of adapted properties will always be given priority for the allocation of housing with suitable adaptations that meet their needs.

3.36 Following the installation or removal of adaptations, the relevant IT systems will be updated in order to keep an electronic record of adapted properties within the Association.

3.37 In all properties (excluding extra-care), EHA properties that become available for allocation will be advertised on Cumbria Choice wherever possible. This will include adapted properties to ensure the process is open and transparent.

3.38 The local occupational therapist and social work teams will also be notified in case they have any client that may benefit these adaptations. There may be individual cases where significant adaptations have been carried out where a direct letting may be made to match the property to the applicant most in need of the property.

3.39 REMOVAL OF ADAPTATIONS AT REQUEST OF TENANT

3.40 Where adaptations have been carried out to a property, these will not normally be reversed, e.g. where a bath has been replaced with a level access shower.

3.41 POSSIBLE REFUSAL OF ADAPTATION REQUESTS

3.42 All decisions will take account of

- Professional recommendations
- The tenant's circumstances
- Equality Act duties
- Health & safety considerations
- Value for money
- Long-term sustainability of the solution

Requests may be refused where

- works are not reasonable or practicable
- the property is unsuitable for adaptation
- the adaptation would not meet the identified need
- alternative housing solutions would provide a more appropriate and sustainable outcome.

3.43 CUSTOMER RIGHT TO REVIEW

- 3.44 Tenants have the right to request a review of a decision made in relation to their application for aids and adaptations. Requests should be made in writing and will be considered by an appropriate manager not previously involved in the decision, wherever possible.

4.0 COMPLAINTS

- 4.1 Tenants can make a complaint through the Association's complaints policy and procedure. Complaints relating to aids and adaptations will be handled in line with the Housing Ombudsman Complaint Handling Code and the Association's current complaints process.

5.0 MONITORING

- 5.1 100% of all major adaptations will be thoroughly inspected before sign-off to check the standard of work.
- 5.2 Performance metrics regarding aids and adaptations will be reported to the Operations & Consumer Committee on a quarterly basis to assist with assurance.

6.0 DATA PROTECTION

- 6.1 In carrying out the aids and adaptations service, EHA will be required to handle, store and share personal information with third-parties. This will be carried out under the EHA Data Protection Policy ensuring compliance with GDPR legislation.

7.0 IMPLEMENTATION

- 7.1 Relevant staff will receive appropriate training on
- Legal & regulatory requirements around aids & adaptations
 - EHA policy and procedures

8. CONSULTATION

- 8.1 To ensure that this policy is customer focused and keeps customers at the heart of its intentions, we have consulted with our Safe & Quality Homes Panel with regard to updating this policy and the associated procedures.
- 8.2 EHA will ensure leaflets are available and provided to all customers contacting the Association about an Aid or Adaptation. Our Tenants handbook will contain information and the tenant newsletter will contain articles from time to time.

9. RESPONSIBILITIES

Director of Operations	Overall responsibility
Repairs & Maintenance Manager Asset Manager Housing Manager	Responsible for overseeing the implementation of this policy and its effectiveness within their service area. Including overseeing: • Assess applications for aids and adaptations received by the Association either via GPs, Occupational Therapists (OT), or directly from a customer or their appointed representative. • Offer advice for suitability of alternative accommodation for an applicant on the waiting list where relevant. • Authorising works costing under the ceiling limit for the works that do not impact on the fabric of the building or do not need a major elemental renewal. • Making decisions on a day to day basis as to whether aids and adaptations are eligible for financial assistance from the Association and whether they are carried out. • Maintaining records on all aids and adaptation requests made and work carried out. • For tenant engagement throughout the process. • For ordering work, liaison with contractors, OTs and referral agencies. • Signposting of tenants applying for alternative funding for aids and adaptations. • Forging relationships with external agencies and commissioners involved with the care of our tenants in order to improve our services. • Liaising with charitable, statutory and other agencies. • Recording on each relevant IT system all properties with adaptations.
Property Asset Officers	• Giving technical advice and, where necessary, drawing up specifications for work. • Liaison and site meetings with OTs • Carrying out post inspections. • The tendering of contracts for aids and adaptation work where required, ensuring an effective supply chain is in place. • When work cannot be carried out making sure that the customer is fully aware of the issues raised and referring the case to a Housing Officer as required. • Any changes to what have been agreed in the initial specification must not be carried out without the prior

	approval of the appropriate lead person for the organisation.
Property Repairs Officers	• assessing requests for minor adaptations • site visit to measure / instruct works where appropriate • completing post inspections of minor adaptation work

10. EQUALITY IMPACT ASSESSMENT

- 10.1 This policy has been assessed as having a positive impact on disability due to it enabling customers to live with greater independence. A copy of the EIA can be found in the appendix.

11. REVIEW

- 11.1 This policy will be reviewed as and when required, but within a maximum of three years and in consultation with tenants.

DEFINITIONS

- O.T. - Occupational Therapist
- Customer - Any applicant, tenant, leaseholder or advocate contacting the association to seek information about Aids and Adaptations.
- “Disability” under the Equality Act 2010 - In the Act, a person has a disability if:
 - they have a physical or mental impairment
 - the impairment has a substantial and long-term adverse effect on their ability to perform normal day to day activities
 - People who have had a disability in the past that meet this definition are also protected by the Act.
- Minor Adaptations – include items such as:
 - Hand/Grab rails
 - Key safes
 - Raised door steps
 - Door intercom systems
 - Adjustment to door handles/window latches
 - Ad hoc requests such as shower screen, safety gates, etc.
 - Temporary ramp
- Major Adaptations – include items such as:
 - Walk-in showers
 - Over Bath Showers
 - Ramps / Modular Ramps
 - Lifts
 - Extensions (to meet of the applicant’s needs)
 - Room conversions
 - Improvements - include items such as:
 - Use of specialist wall covering i.e. Perspex or padding
 - Use of specialist flooring i.e. hard-wearing or easy to clean
 - Soundproofing
 - Replace pendant light fittings with flush to the ceiling fixtures to prevent a tenant pulling of the lights
 - Track Hoists

Appendix B
Equality Impact Assessment

Question	Response
1. Name of the policy/practice/activity being assessed	Aids and Adaptations Policy
2. Summary of aims and objectives of the policy/practice/activity	To provide an effective aids and adaptations service to our customers or future customers
3. What involvement, consultation, engagement has taken place for the policy/practice/activity (e.g relevant groups/stakeholders)	Safe and Quality Homes Panel 30/04/2026 – Members of the panel were given an overview of the changes made to the policy, with particular reference to the timescales which were agreed. Question was raised in relation to the £1,000 limit for minor adaptations, and we confirmed this is consistent with the sector
4. Who is affected by the policy/practice/activity	Any residents who may require alteration to their current home or future home.
5. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity	Policy is on a review cycle.

Protected Group	Is there a potential for a positive or negative impact	Explain and provide evidence/data used	Action to address the negative impact
Disability	Yes	This policy may affect any people/person who is affected by a disability and requires alterations carried out to their home.	EHA are committed to ensure that any resident who requires an adaptation to their home has the work completed. Where the property is unsuitable for adaptation support will be offered to look at more suitable accommodation for their needs.
Gender reassignment	NO-		

Marriage or civil partnership	NO -		
Pregnancy or maternity	NO -		
Race	NO -		
Religion or belief	NO		
Sexual orientation	NO		
Sex (gender)	NO		
Age	NO		

Evaluation

Question	Explanation	
Is it possible the proposed policy/practice/activity could discriminate or unfairly disadvantage people		
Decision	Tick the relevant box	Include any justification required
1. No barriers identified – proceed		
2. Barriers identified towards one (or more) protected groups – stop		

3. Barriers identified towards one (or more) protected groups – adapt or change the policy/practice/activity	X	It is necessary to have this policy which is delivered in a way to minimize potential negative impact on affected individuals
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so proceed with caution		

Completed by – and date	Stella Eggleston May 2026		
Reviewed by	Director of Operations – 2 July 2026		
Review Date (if applicable)	May 26		
Will this EIA be published	Yes	No x	Not Required

Action (To be completed as required)

If the Evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register	Date Compl
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Change Log

Name	Date	Version	Change
	When published	1	

Tenant Engagement Assessment – is engagement with tenants necessary?

Impact	Tick relevant box	Note any details / justification
No Impact on current tenants – you can proceed without engagement, explaining why.		
Direct or indirect impact on current tenants. Stop! Identify who will be affected i.e. all tenants or a specific group.	x	All tenants potentially affected if they require adaptations.

Influence	Tick relevant box	Note any details / justification
No influence for tenants – i.e. wholly legislative – you can proceed without engagement, explaining why.		
Possible influence on areas of policy/ practice/ activity impacting on tenants – stop. Arrange engagement with EIO	x	Engagement work completed with Safe & Quality Homes Panel
Best place for influence is the practical delivery of the policy – through procedure. Please summarise approach for procedure review		

Summary of engagement (To be completed as required)

Tenant group impacted and engaged (i.e. all/ sheltered)	
Consultation method	
Summary of engagement	
Key themes/ implications	

If you would like some assistance to work through this engagement assessment, please contact Jenny Webb – EIO.

Health & Safety Policy Review Assessment

Question	Additional information	
Does this policy/practice/activity address any Health & Safety practices?	Yes	
What is the key legislation related to this policy?	LOLER Regulations	
Is the policy a control of a corporate or operational risk register? (if yes name risk)	Yes – CRR 6	
Tick groups/ departments who require knowledge of this policy		
	All staff	
	ICT	
	Finance	
	Housing Options	
	Housing	x
	Customer Services	
	Property	x
	HR	
	Governance	
	Assisted Living	
	Contractors	
	Tenants	
Risk to tenants	Tick the relevant box	Additional Information
1. Are there additional measures required to reduce risk level to tenants.	No	
2. Has that risk been assessed?		
3. No Health & Safety implications		
4. Does it require tenant visibility?		

All assessments completed by:	Author: Stella Eggleston Date: May 2026
All assessments reviewed by:	Reviewer(s): Executive Team Date: 9 July 2026
Will these assessments be published?	Completed assessments are appended to each policy. Any appropriate public related policies are uploaded to the EHA website