
Sanctuary Scotland

Title: Aids and Adaptations - Sanctuary Scotland Policy

Business Function: Housing and Property Functions across Scotland

Author: Policy and Equalities Manager

Sign Off: Director of Sanctuary Scotland
Head of Operations - Property (Scotland)

Authorised by: Executive Committee
Sanctuary Scotland Board of Management

Sanctuary in Scotland:
Sanctuary Scotland Housing Association Limited is a subsidiary of
Sanctuary Housing Association, an exempt charity.

Uncontrolled copy if printed

1. Policy statement

- 1.1 The purpose of this policy is to provide an overview of the Aids and Adaptations service delivered by Sanctuary Scotland (jointly referred to as Sanctuary).
- 1.2 This service is intended to support tenants with a disability or infirmity affecting their ability to carry out normal day-to-day activities, to live independently in their home and enjoy a good quality of life.

The definition of 'disability' under the Equality Act 2010

As per the [Equality Act 2010](#) (the Act) a person has a disability if:

- they have a physical or mental impairment; and
- the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

For the purposes of the Act, these words have the following meanings:

- 'substantial' - more than minor or trivial;
- 'long-term' - the effect of the impairment has lasted or is likely to last for at least twelve months; and
- 'normal day-to-day activities' - includes everyday things like eating, washing, walking, and going shopping.

- 1.3 Sanctuary is committed to promoting and delivering aids and adaptations services that:
- are fair and equitable, consistent and transparent;
 - assessable for all and ensures the effective prioritisation of all enquiries and applications; and
 - accesses funding for major works; and
 - are responsive to customer feedback

2. Roles and responsibilities

- 2.1 The Director of Sanctuary Scotland and Head of Operations - Property (Scotland) are responsible for ensuring that staff adhere to this policy and procedure and for ensuring that all measures are in place to implement this procedure effectively.
- 2.2 All staff involved in the aids and adaptations process are responsible for ensuring adherence to this procedure.

3. References and sources

- 3.1 The following legislation, references and sources are relevant to the development and delivery of this policy and associated procedure:
- **SHGN 2012/04 Procedures for HAG funding of Stage 3 adaptations** provides guidance on HAG funding process and eligibility;

- **Joint Improvement Team Good Practice Guide for the Provision of Major Adaptations 2010** provides guidance on how to effectively develop, deliver, manage, and monitor the provision of major adaptations; and
- **Adaptations without Delay, published by the College of Occupational Therapists (OTs) (2019)** provides guidance on completing adaptations without an OT referral.

4 Impact on diversity

- 4.1 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with '[Inclusion for all - Equality, Diversity and Inclusion Strategy 2024-2026](#)'.

5. Resident consultation

- 5.1 Resident Review Panels reviewed the Aids and Adaptations service in 2018, which fed into the development of this policy.

6. Monitoring and compliance

6.1 Period of review

- 6.1.1 Until a new policy is formally adopted this document will remain in force and operational.
- 6.1.2 This policy will be reviewed in accordance with the policy review programme agreed by relevant governing bodies.
- 6.1.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, Director of Sanctuary Scotland will initiate an immediate review.
- 6.1.4 Where appropriate, key stakeholders, customers and interested parties will be consulted as part of any review of this policy.

7. Approval

- 7.1 This policy is approved by Sanctuary Group's Executive Committee and Sanctuary Scotland Board of Management.

8. Classification of adaptation types

8.1 For the purposes of Housing Association Grant (HAG), adaptation works are classified by the Scottish Government in three groups:

Stage One	Design features which are not specific to a particular condition or individual and which are incorporated into the initial specification for the property prior to its construction or improvement.
Stage Two	Adaptations to a house to suit the particular requirements of the tenant to whom the property has been allocated before or close to practical completion of the construction or improvement works. These adaptations may be carried out by the original contractor.
Stage Three	Works to adapt a property to suit the changing needs of an existing tenant or a new tenant where these could not reasonably have been identified when the house was originally constructed or let.

8.2 This policy covers Stage Two and Stage Three adaptations only.

9. Stage Two adaptations

9.1 Stage Two adaptations are adaptations to a house to suit the requirements of a tenant who has been allocated a property before or close to completion of construction or improvement works.

9.2 When allocating newly constructed properties, we will identify prospective tenants who may require aids or adaptations, with particular reference to any medical priority on an application form, and/or aids and adaptations in their existing property. Sanctuary will not approve any Stage Two adaptations in properties under construction without a referral from an OT or other specialist. This is to enable Sanctuary to seek HAG for these Stage Two adaptations.

10. Stage Three adaptations

10.1 Stage Three adaptations are works to adapt an existing property to suit the changing needs of an existing tenant or a new tenant where these could not reasonably have been identified when the house was originally constructed or let.

10.2 Adaptations under £250

Adaptations estimated to cost less than £250 (including VAT) will normally be funded through Sanctuary's responsive repairs budget.

10.3 Adaptations over £250

10.3.1 Sanctuary will set an adaptations budget each year when confirmation has been received from the Grant Provider (Scottish Government, Glasgow City Council or City of Edinburgh Council) on the annual funding allocation for Stage Three HAG funding.

10.3.2 Sanctuary will make applications for approval of HAG, and any other eligible costs, to the Grant Provider for adaptations over £250 which are eligible for Stage Three HAG funding. Stage Three adaptation works potentially eligible for HAG funding should be 'structural' i.e., they are fixed or become part of the structure of a property. Examples of items that may be eligible for HAG funding are shown in **Appendix 1**.

10.3.3 Adaptations estimated to cost over £250 which are not eligible for Stage Three HAG funding will be funded from the responsive repairs budget.

10.3.4 All applications for approval of HAG for Stage Three adaptations must be based on advice or medical opinion from an OT or another specialist, and must comply with specific recommendations given during such an assessment.

10.3.5 Sanctuary will use approved contractors for adaptations costing up to £15,000 in line with our standard repairs and maintenance procurement arrangements. Where possible, these contracts will be put out for tender on a regular basis, for example, annually, with a fixed price for specific aids and adaptations. Sanctuary will conduct a full tendering procedure, as required by the Scottish Government, for adaptations costing over £15,000.

10.3.6 The cost of any regular servicing or maintenance for aids and adaptations installed will be met by Sanctuary.

10.4 Minor Adaptations

10.4.1 In most cases, before doing any adaptation, Sanctuary will require an OT referral so that it can claim HAG. In some cases, Sanctuary may carry out minor works without the need for an OT referral, in order to provide a quicker and more efficient service for our tenants. Sanctuary will consider the following factors when deciding whether an adaptation can be classified as minor:

- confidence of the Designated Officer (for example, Maintenance Surveyor) in providing the correct specification for the adaptation;
- current waiting times for an OT referral;
- available information on the priority of need, for example, has the applicant had any recent accidents which might have been prevented with an aid or adaptation;
- whether or not the applicant would prefer to wait for specialist advice;
- the cost of the aid/adaptation;
- whether the cost of the aid/adaptation can be claimed through HAG; and
- current availability of funding in the aids and adaptations budget of the relevant landlord.

10.4.2 Sanctuary will only consider carrying out minor adaptations without OT approval, with reference to the list of works suggested by the College of Occupational Therapists as suitable for installation without an OT assessment visit. These minor adaptations are listed in **Appendix 1** of the procedure associated with this policy, with technical guidance provided in **Appendix 2**.

11. Monitoring and prioritisation

- 11.1 Sanctuary will normally schedule works in the order in which requests / referrals are received. In cases where the OT or other health professional has indicated that the tenant cannot return to their property without the adaptation (for example from a hospital or residential care setting), it will give priority to the works required to that property.
- 11.2 When an adaptation has been agreed, Sanctuary will liaise with the tenant and the approved contractor to ensure the work is carried out to the required standard.
- 11.3 Sanctuary will decide on prioritisation of major adaptations based on the level of priority identified, for example by the OT, and on the availability of the budget. Sanctuary will monitor and control expenditure to ensure that it is spread through the year, i.e., normally spend no more than a quarter of the budget over the first three months, normally no more than half the budget over the first six months, and normally no more than three-quarters of the budget over the first nine months.
- 11.4 Where there are budget pressures, we will be informed by OTs in deciding on the level of priority for different adaptations.
- 11.5 Where an adaptation has been delayed because it is a lower priority, applicants can request a re-assessment if they feel that their circumstances have changed.

12. Adaptations as part of planned and refurbishment works

- 12.1 Before planned works begin, such as kitchen or bathroom improvements, Sanctuary will identify properties that have already been adapted. Sanctuary will also ask tenants about their needs and refer them to an OT if appropriate. This will ensure that tenants' needs are taken into account during the programmed works. Sanctuary will protect or replace existing adaptations where they are affected by the planned works.
- 12.2 Where new adaptations are required in homes included in planned work programmes, Sanctuary will consider providing these as part of the programme where this makes sound practical and economic sense for the tenant and for the organisation.

13. Eligibility

- 13.1 Sanctuary's aids and adaptations service is not available to owners of shared equity properties.
- 13.2 Where tenants are on a transfer list and they are expected to transfer within six months of the application for a major adaptation, Sanctuary will consider their request on a case-by-case basis.

13.3 Sanctuary will base any decision on whether to provide funding towards major adaptations on the following factors:

- the degree of urgency indicated by the OT;
- the property layout and what is technically possible;
- the tenant's longer-term needs and those of his/her household;
- the availability of suitable alternative accommodation;
- the best use of housing stock;
- the cost of the works requested; and
- the availability of the budget.

13.4 Where appropriate Sanctuary will discuss options with the tenant, and consider whether alternative accommodation with a higher level of support would be more appropriate.

13.5 Where a disabled applicant applies for accommodation that does not meet their identified access needs, we will give due consideration to the application, taking into account whether it is reasonable and practicable to carry out requests for aids and adaptations when assessing the application.

14. Communication and customer feedback

14.1 Sanctuary commits to providing tenants with good information and updates on progress throughout the adaptations process, from application through to delivery.

14.2 Where tenants have carers, advocates or any other relevant interested third party we will fully include those parties in any discussions, communication and planning.

14.3 Sanctuary will regularly seek tenants' views on the adaptations process and use this information to inform our service delivery. Complaints about the service will be dealt with in line with the [Customer Contact, Complaints Handling and Compensation - Scotland Policy and Procedure](#).