

# ADAPTATIONS POLICY

## **1. Purpose**

- 1.1 This policy applies to the Red Kite Housing Group (“Red Kite”), encompassing Red Kite Community Housing and Twenty11 Homes. Where different statutory or regulatory requirements apply because of the tenure or status of a home, we will apply the requirements relevant to that home.
- 1.2 We want our homes and services to support the safety, wellbeing and independence of tenants and occupants with disabilities or other assessed needs. This policy sets out how we will assess, approve, deliver, record and maintain adaptations and specialist equipment, and when we may support a move to a more suitable home instead.
- 1.3 We will provide a fair, accessible and transparent adaptations service. We will assist tenants seeking adaptations to access appropriate services and work with local authorities, health and care professionals and other relevant organisations so that appropriate adaptation services are available.
- 1.4 We will balance individual assessed need, safety, the long-term suitability of the home, effective use of adapted housing and value for money. Decisions will be evidence-based and will take account of our legal and regulatory obligations, including our duties towards disabled people.

## **2. Responsibilities**

### **2.1 Assistant Director of Property**

The Assistant Director of Property is accountable for this policy, the adaptations budget, strategic oversight of the service, performance and assurance, and approval of adaptations above delegated financial limits.

### **2.2 Housing Adaptations and Lettings Panel (HALP)**

HALP is responsible for considering adaptation cases where there are multiple or complex factors requiring a wider decision. This may include cases involving significant cost, relevant tenancy issues, consideration of alternative housing, or where the appropriate course of action is otherwise unclear.

HALP may approve adaptations within its delegated financial authority and will ensure that significant decisions, including any conditions or alternative options considered, are appropriately recorded. Where HALP supports an adaptation in principle but the cost exceeds its delegated approval limit, the case will be referred for approval in accordance with Red Kite's current delegated authority arrangements.

### **2.3 Building Surveyor – Adaptations Lead**

The Building Surveyor – Adaptations Lead will oversee requests, liaise with Occupational Therapists (OTs) and other relevant professionals to assess technical feasibility, develop appropriate solutions, obtain required permissions, control costs and oversee delivery. They will also work with the Empty Homes & Lettings Team to check home suitability.

### **2.4 Tenant-facing teams**

Tenant-facing teams will identify and record adaptation needs, make or support appropriate referrals, arrange straightforward minor works where authorised and keep tenants informed. Staff will record relevant accessibility, communication and support needs in accordance with our data protection requirements.

## **2.5 Tenants and occupants**

Tenants and occupants should provide relevant information to support the assessment of their needs and tell us if their circumstances or needs change. Tenants are required to provide reasonable access to the home so that we can assess their needs and the suitability of the home, and carry out agreed works.

Where access is not provided, we will follow our established No Access Process and make reasonable attempts to understand and address any barriers to access, including any reasonable adjustments that may be required. Where access continues to be withheld without reasonable explanation, we may close the adaptation request. We will consider the individual circumstances, identified risks and the impact of closing the request before doing so.

## **3. References, Legal & Regulatory Framework**

- 3.1 We will comply with legislation and statutory requirements relevant to adaptations, including:  
Equality Act 2010; Housing Grants, Construction and Regeneration Act 1996 and the Disabled Facilities Grant framework; Housing Act 1985 and Housing Act 1988 where applicable; Housing and Regeneration Act 2008; Care Act 2014 where relevant; Human Rights Act 1998; and Renters' Rights Act 2025 provisions as and when they apply to the relevant tenancy.
- 3.2 We will comply with the Regulator of Social Housing's applicable regulatory standards, including the Safety and Quality Standard, Transparency, Influence and Accountability Standard, Tenancy Standard and Neighbourhood and Community Standard.
- 3.3 In particular, we will meet the requirement to assist tenants seeking housing adaptations to access appropriate services, communicate how we will do this, and co-operate with tenants, local authority departments and other relevant organisations so an adaptations service is available where appropriate.
- 3.4 We will also have regard to relevant statutory Disabled Facilities Grant guidance, Housing Ombudsman guidance and learning, and the Housing Ombudsman Complaint Handling Code.
- 3.5 This policy should be read alongside our Repairs Policy, Allocations Policy, Tenancy Policy, Asset Management Strategy, relevant Home Safety policies, Mobility Scooters Policy, Complaints Policy and HALP Terms of Reference.

## **4. Definitions**

### **4.1 Adaptation**

An alteration, addition or item of specialist equipment intended to enable a disabled person or person with an assessed need to use their home more safely and independently.

#### 4.2 **Disability**

Disability has the meaning given in the Equality Act 2010.

#### 4.3 **Minor adaptation**

A straightforward, generally low-risk adaptation costing up to £1,000, such as certain grab rails, handrails or other aids, where appropriate.

#### 4.4 **Routine adaptation**

An adaptation costing more than £1,000 that does not require the bespoke management associated with a complex adaptation.

#### 4.5 **Complex adaptation**

Specialist, structural or high-impact works requiring bespoke design, technical assessment, permissions, specialist procurement or significant coordination with other organisations.

#### 4.6 **Eligible applicant**

A tenant or permanent occupant of the home whose need for an adaptation has been appropriately identified. We may consider other circumstances where required by law or where there is a compelling reason to do so.

### 5. **Key Principles**

#### 5.1 We will:

- put safety, assessed need, dignity and independence at the centre of decisions;
- make decisions fairly and consistently while considering individual circumstances;
- meet our Equality Act 2010 obligations and provide reasonable adjustments to our service where required;
- work constructively with local authorities, OTs, health and care professionals and other relevant partners;
- consider current needs and, where supported by appropriate evidence, reasonably foreseeable needs;
- make effective use of existing adapted homes and adaptation investment;
- keep accurate property-level records of significant adaptations and accessibility features;
- communicate decisions, reasons, expected timescales and significant changes clearly and in an accessible way; and
- use performance, tenant feedback, complaints and other insight to improve the service.

#### 5.2 Our duty to consider individual circumstances does not mean that every requested adaptation will be approved. We may refuse, defer, limit or propose an alternative to an adaptation where, following an individual assessment, this is reasonable and proportionate. In reaching our decision, we may take account of the suitability and

long-term use of the home, availability of suitable alternative homes, under- or over-occupation, the scale and cost of the proposed works, alternative ways of meeting the assessed need, tenancy circumstances, an application to purchase the home, and any other relevant property or household circumstances.

- 5.3 These factors will not be applied as automatic exclusions. We will consider the tenant's or occupant's assessed needs, the impact of not carrying out the adaptation, relevant professional advice, our obligations under the Equality Act 2010, available alternatives and whether the proposed decision is reasonable and proportionate.
- 5.4 Where a tenancy breach or condition within the home prevents works from being carried out safely, we may defer or suspend the adaptation until it is safe for our employees and contractors to proceed. We will explain what action is required and consider whether reasonable adjustments or other appropriate support could enable the work to proceed safely.
- 5.5 Where a Right to Buy or Right to Acquire application is in progress, we will consider the circumstances of the proposed purchase alongside the urgency and nature of the adaptation and the tenant's assessed needs. We may also consider whether adaptation expenditure can appropriately be reflected in, recovered through, or otherwise taken into account as part of the applicable statutory sale process. An application to purchase the home will not, by itself, result in automatic refusal of an adaptation.
- 5.6 Where we decide that the tenant's long-term needs would be better met by moving to a more suitable home, we will explain the reasons and the housing options available. The tenant will normally be responsible for applying or re-registering with the relevant choice-based lettings service, and we will provide information and assistance to help them do this. In appropriate circumstances, we may also consider a move under our Priority Moves Policy.

## **6. Policy Statement**

### **6.1 Access and assessment**

Tenants and occupants can tell us about an adaptation need directly or through a representative or professional. We will provide accessible routes for making requests and will make reasonable adjustments to the process where needed.

Major or specialist adaptations must be supported by an assessment from an OT or other suitably qualified professional. We will not unnecessarily require an OT assessment for straightforward minor adaptations where need can appropriately be established through our agreed process.

Where needs are complex, progressive or likely to change, we will consider relevant professional evidence about reasonably foreseeable needs to avoid inappropriate or short-lived solutions.

### **6.2 Prioritisation**

We will normally progress adaptation requests in the order in which they are ready to proceed. We recognise that many adaptation requests involve risks to safety, mobility or independence and these factors alone will not normally result in a request being prioritised ahead of others.

In exceptional circumstances, we may prioritise a request where there is a compelling need for the adaptation to be completed more quickly. This may include where an adaptation is required to support end-of-life care or to enable or facilitate discharge from hospital. We may consider other exceptional circumstances where the consequences of delay would be particularly significant.

Decisions to prioritise a request will be based on the individual circumstances and available evidence and will be recorded. Prioritising one request may affect the delivery of other adaptations and we will take this into account when making our decision.

We, or the contractor delivering the work on our behalf, will keep the tenant informed about the progress of their adaptation and advise them of significant changes or delays.

### **6.3 Decision making**

In deciding whether and how to adapt a home we will consider:

- assessed need and risk;
- the impact of not carrying out the work;
- technical and practical feasibility;
- current and reasonably foreseeable needs;
- the suitability, condition and expected use of the property;
- household circumstances;
- cost, available funding and value for money;
- whether an existing adapted or more suitable home is realistically available; and
- our legal and regulatory obligations.

Straightforward adaptation requests will be progressed within the relevant delegated authority. HALP will consider cases where there are multiple or complex factors requiring a wider decision, including significant cost, relevant tenancy issues, whether alternative housing should be considered, or where the appropriate course of action is otherwise unclear.

HALP may approve works within its delegated financial authority. Where HALP supports an adaptation in principle but the cost exceeds its delegated approval limit, the case will be referred for approval in accordance with Red Kite's current delegated authority arrangements. The reasons for significant decisions, including any conditions or alternative options considered, will be recorded.

### **6.4 Categories and service targets**

Our target completion times following approval and receipt of the information required to proceed are:

| Category | Value        | Target                                                    |
|----------|--------------|-----------------------------------------------------------|
| Minor    | Up to £1,000 | 15 working days / 3 weeks                                 |
| Routine  | Over £1,000  | 30 working days / 6 weeks                                 |
| Complex  | Variable     | Individual programme agreed, but usually 90+ working days |

Complex adaptations may depend on design, planning or other permissions, funding decisions, specialist procurement or external partners. We will give the tenant an expected programme, review outstanding cases regularly and explain significant delays or changes.

Where there is an immediate safety concern, we will consider interim measures where possible and feasible, while the permanent solution is being progressed.

## 6.5 Property suitability and alternative housing

We may decide that adapting the existing home is not reasonable or would not provide an appropriate long-term solution. This may include where:

- the works are technically impractical or would create an unacceptable safety risk;
- the adaptation would not adequately meet the assessed need;
- the scale or cost of the works does not represent value for money, taking account of the likely benefit and long-term suitability of the home;
- the size, type, condition or other characteristics of the home mean that adaptation would not provide a sustainable solution; or
- moving to a more suitable home is considered a more appropriate way of meeting the tenant's or occupant's long-term needs.

Where we consider that moving may provide a more appropriate solution, we will discuss this with the tenant and explain the housing options available. This may include applying or re-registering with Bucks Home Choice or the relevant choice-based lettings service, which may provide access to suitable homes from Red Kite or other housing providers. Responsibility for making and maintaining such an application remains with the tenant, although we will provide information and assistance to help them do this.

In appropriate circumstances, we may consider whether the household meets the criteria for a **Priority Move**, in accordance with our Priority Moves Policy. A decision under this Adaptations Policy does not in itself create entitlement to a Priority Move.

## 6.6 Funding

We will maintain an annual adaptations budget and seek to use available resources effectively.

Where appropriate, we will work with the relevant local authority to identify and maximise Disabled Facilities Grant or other external funding and provide landlord information or consent without avoidable delay.

Any tenant contribution will only be considered where there is a clear and reasonable basis, for example where a tenant requests enhancements beyond the assessed

solution or where an applicable funding arrangement requires a contribution. We will explain this before works are agreed.

## **6.7 Tenant-requested works and consent**

Tenants must obtain our written consent before carrying out their own adaptation to our property. They can request this through the Permission Request Form on our website, or get assistance to complete this by calling our contact centre.

We will consider requests fairly, promptly and in accordance with our legal obligations. We will not unreasonably withhold consent or impose unreasonable conditions where the law requires this.

Consent may include reasonable conditions concerning design, competent installation, statutory approvals, safety, future maintenance and reinstatement. Where consent is refused, we will explain why and advise the tenant of any alternative that may be available.

## **6.8 Delivery, maintenance and records**

Adaptations commissioned by us will be completed by appropriately competent contractors and will comply with applicable legal, safety and technical requirements.

We will record significant adaptations and accessibility features against the property and use this information when considering future investment, allocations and lettings.

We will make clear who owns and is responsible for maintaining specialist equipment.

Equipment for which we are responsible will be inspected, serviced, repaired and replaced as required. Where another organisation or the tenant is responsible, we will make this clear.

Where safe, suitable and cost-effective, we may reuse specialist equipment.

When a home becomes empty, we will consider whether adaptations should be retained and matched to a household that needs them before deciding to remove them.

## **6.9 Communication and customer experience**

We will keep tenants informed at key stages of their adaptation and provide information in an accessible format, taking account of any known communication needs or reasonable adjustments.

For cases being considered by HALP, we will write to the tenant to confirm that their case is being referred to HALP and provide the expected timescale for a decision. Following HALP consideration, we will write to the tenant again to explain the decision and, where relevant, what will happen next.

For adaptations that do not require HALP consideration, we will write to the tenant to confirm the expected timescale for progressing the work.

Correspondence will normally be sent by email or post, taking account of the tenant's known communication needs and preferences.

Where a contractor has been allocated, we will provide the tenant with the contractor's name and contact details. The contractor will contact the tenant directly to arrange any required survey and agree the start date for the works.

We will not routinely provide progress updates where there has been no material change to the information already provided. Where circumstances change significantly, including where there is a significant delay to the expected timescale, either we or the contractor acting on our behalf will update the tenant and explain the reason for the change or delay.

We will seek feedback following completed adaptations and use tenant experience, complaints and other learning to improve the service.

#### **6.10 Appeals and complaints**

A tenant may appeal a decision about an adaptation. Wherever practicable, the appeal will be considered by a person or panel not responsible for the original decision. Any appeal of the decision that has been requested by a tenant or their advocate, must be considered within 28 working days of all the information being provided. We will explain the outcome and reasons.

An appeal does not remove the tenant's right to make a complaint. Concerns about delay, communication, service delivery, decision making or failure to follow this policy can be considered through our Complaints Policy and, where applicable, by the Housing Ombudsman. Tenants will not be required to exhaust an internal adaptation review before accessing the complaints process.

#### **6.11 Performance and assurance**

We will monitor the adaptations service to ensure we understand demand, performance, risk and tenant experience.

This will include appropriate oversight of outstanding and overdue cases, completion against service targets, complex cases and delays, refusals and reviews, complaints, satisfaction, expenditure and relevant equality and accessibility information where it is lawful and appropriate to use it.

Operational management will review performance regularly. Material risks, persistent service failures and significant exceptions will be escalated through our governance arrangements.

We will use case review, management assurance, tenant feedback, complaints and internal or external audit as appropriate to test compliance with this policy and identify improvements.

## **7. Decision and Assurance Principles**

- 7.1 Adaptation decisions must demonstrate a clear evidence trail showing the identified need, relevant risks, options considered, Equality Act considerations where applicable, the decision and reasons, agreed timescale and communication with the tenant.
- 7.2 Where an adaptation is refused, deferred in favour of rehousing, significantly delayed or falls outside normal delegated arrangements, the case record must demonstrate why the decision is reasonable and proportionate and how the tenant's needs and relevant legal duties have been considered.
- 7.3 Property records must be updated following completion of significant adaptations so that information about accessibility and adapted stock can inform future repairs, investment, allocations and lettings.

| Document Controls                         |                                             |                    |                                     |
|-------------------------------------------|---------------------------------------------|--------------------|-------------------------------------|
| Version                                   | 8                                           | Effective date     | October 2026                        |
| Subject matter expert drafter             | Assistant Director of Property              | Policy owner       | Assistant Director of Property      |
| Related pod                               | Property                                    | Related policy     | See section 3.5                     |
| Review period                             | 3 Years                                     | Next review due by | October 2029                        |
|                                           |                                             |                    | YES                                 |
| Red Kite Group policy, including Twenty11 |                                             |                    | <input checked="" type="checkbox"/> |
| Equality Impact Assessment completed      |                                             |                    | <input checked="" type="checkbox"/> |
| Delegated approvals                       |                                             |                    |                                     |
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