Housing Adaptations Policy

Thurrock Council

September 2026

Contents

Aims and Purpose 3

Corporate Context 4

Legislation, Regulation and Best Practice Framework 5

National Context 7

Local Context 8

Definitions 9

Delivery Model 10

Eligibility and Assessment Process 11

- Eligibility 11
- Assessment Process 11
- Grounds for Refusal 12

Prioritisation Criteria 13

Types of Adaptations 14

- Minor Adaptations 14
- Major Adaptations 15

Funding and Responsibilities 16

Applications, Appeals and Complaints 17

Monitoring, Measuring and Review 18

Policy Development Principles 19

Version Control 21

Aims and Purpose

The purpose of this policy is to set out how Thurrock Council will deliver timely, fair, and high-quality housing adaptations for disabled people who live in homes owned by the council and held within the Housing Revenue Account (HRA). The policy aims to support disabled people to remain independent and safe in their homes, reduce risks such as falls and hospital admissions, and thereby minimise reliance on formal or informal care.

It responds to the council's strategic commitment to improve residents' health and wellbeing, and enable people to live fulfilling lives. By aligning with national legislation and best practice, the policy also seeks to maximise benefits and ensure that council tenants receive adaptations that meet their needs and offer value for money.

As this policy is specifically for council tenants it does not cover other types of tenure such as, owner occupiers, those renting in the private sector or leaseholders within council owned blocks. For other tenures please refer to the council's Disabled Facilities Grant and Housing Assistance Policy.

Corporate Context

The Housing Adaptations Policy supports the priorities set out in the **Thurrock Corporate and Improvement Plan 2025-2029**, which emphasises fixing the council's foundations, modernising services, listening to communities and enabling partners. In particular, the plan pledges to:

- **Improve and enable**: modernise and digitise services to be accessible and financially sustainable and develop a new culture of listening and codesign.
- **People**: collaborate with partners, focus on early intervention and prevention, and unlock improved life chances.
- **Place**: ensure access to safe, sustainable, and affordable housing and improve the environment.

The policy also aligns with the council's commitment to rebuild trust through transparency, accountability, and good governance. It contributes to the council's aim to improve population health, provide joined up services and reduce the need for intensive interventions. It supports the housing strategy's vision for safe, stable, and suitable homes delivered in a human and empathetic way.

Legislation, Regulation and Best Practice Framework

This policy is underpinned by:

- Housing Grants, Construction and Regeneration Act 1996
- Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
- Equality Act 2010
- Care Act 2014
- Chronically Sick and Disabled Persons Act 1970
- Relevant Disabled Facilities Grant (DFG) guidance
- Armed Forces Act 2006

The statutory purposes of adaptations are set out in Section 23(1) of the 1996 Act.

The Council must be satisfied that works are:

1. **Necessary and appropriate** for the needs of the disabled person (determined in consultation with Social Care); and
2. **Reasonable and practicable** having regard to the age and condition of the property (determined by the Housing Authority).

In determining whether works are reasonable and practicable, the Council may consider:

- structural feasibility;
- site constraints and ground conditions;
- the scale and complexity of required works;
- likely disruption to the household;
- long-term suitability of the property;
- comparative costs of alternative solutions, including rehousing;
- whether the proposed adaptation would represent proportionate and effective use of public resources.

Works which are technically possible may nevertheless be assessed as not reasonable and practicable.

The maximum mandatory DFG is currently £30,000 per application. This statutory limit applies only where a formal DFG application is made.

Under section 343AA of the Armed Forces Act 2006 (as amended by the Armed Forces Act 2021), the council will have due regard to the principles of the Armed Forces Covenant when exercising functions relevant to this policy, and may give special consideration to veterans in appropriate circumstances.

National Context

Home adaptations are recognised nationally as a key component of enabling disabled people of all ages to live safely and independently in their own homes. National housing, health and social care policy emphasises the role of suitable housing in preventing hospital admissions, supporting timely discharge, reducing falls and injuries, and minimising reliance on long-term care.

The integration agenda across housing, health and adult social care highlights the importance of early intervention and preventative action. Adaptations such as level access showers, stairlifts, ramps, accessible kitchens and improved heating systems are widely evidenced as cost-effective measures that improve quality of life, sustain tenancies and reduce demand on health and care services.

National guidance makes clear that decisions regarding adaptations must be based on whether works are necessary and appropriate to meet the needs of the disabled person, and reasonable and practicable having regard to the property. Authorities are expected to consider both current and anticipated future needs and to take account of the impact on carers and other household members.

For local authorities that retain housing stock, adaptations in council homes are commonly delivered directly by the housing authority in its capacity as landlord, funded through Housing Revenue Account resources. This approach enables councils to streamline processes, avoid unnecessary administrative barriers, and ensure that tenants receive timely support while maintaining compliance with statutory duties and equality obligations.

Local Context

Thurrock Council retains and manages its own housing stock and delivers housing adaptations within council homes in its capacity as landlord. Adaptations are funded primarily through the Housing Revenue Account (HRA) capital programme and delivered through coordinated working between Housing, Adult Social Care and technical services.

The Council's Housing Strategy and Corporate Plan emphasise prevention, early intervention and person-centred services. Timely delivery of adaptations supports these objectives by enabling tenants to remain safely in their homes, preventing avoidable hospital admissions, reducing falls and associated injuries, supporting carers and sustaining family arrangements, and reducing the likelihood of tenancy breakdown.

Thurrock has an ageing population and increasing prevalence of long-term health conditions, mobility impairments and complex needs. Demand for adaptations is expected to grow. Delivering adaptations efficiently within the Council's own housing stock is therefore an important component of wider health and care integration, supporting residents to live independently for as long as possible.

As landlord, the Council must balance individual needs with the effective management of its housing assets. Decisions regarding adaptations therefore consider long-term sustainability of the property, value for money, and the wider needs of the housing stock, while ensuring compliance with statutory duties and obligations.

This policy also aligns with the council's corporate commitment to early intervention, prevention, and collaboration, and with the plan to ensure access to safe, sustainable, and affordable housing.

Definitions

Disabled person: A person who meets the definition in section 100 of the Housing Grants, Construction and Regeneration Act 1996, including people with a physical disability, sensory impairment, learning disability, mental health condition, cognitive impairment or other substantial and long-term disability.

Adaptation: alterations (which may be referred to as '*works'*) to the fabric or fixtures of a home to make it safer and easier for the disabled person to live independently. Examples include ramps, stairlifts, level access showers, through floor lifts, door widening, accessible kitchens and appropriate heating.

Minor adaptations: relatively simple works, typically costing less than £1,000, such as grab rails, lever style door handles, or small ramps. These will be funded from the council's housing management budgets.

Major adaptations: more substantial works costing over £1,000, such as level access showers, extensions, lifts, or extensive kitchen alterations. Major adaptations will be considered for funding from capital budgets when the statutory tests of necessity, appropriateness, reasonableness, and practicability are satisfied, which will be determined by the housing service.

Mandatory Disabled Facilities Grant (DFG): a grant awarded under the 1996 Act to meet the statutory purposes listed in section 23. The maximum grant is currently £30,000 per application.

Discretionary assistance: additional financial support that the council may provide beyond the mandatory limit under its Disabled Facilities Grant and Housing Assistance Policy. This could include top-up grants, relocation assistance or funding to improve energy efficiency, subject to available resources and published criteria.

Disabled Tenant: A disabled person who is a tenant of the Council. For the purposes of this policy, the term also includes members of a Council tenant's household who normally reside, or are expected to normally reside, in the dwelling for which an adaptation is being considered. This reflects and is consistent with the concept of a 'Disabled Occupant' used within the Housing Grants, Construction and Regeneration Act 1996 and associated statutory guidance.

Delivery Model

Local authorities are able to design and adopt their own policies and procedures (schemes) in providing assistance under the Housing Grants, Construction and Regeneration Act 1996, as long as that scheme is compliant with the legal framework and social housing tenants are not treated less favourably than those in other tenures.

A Disabled Facilities Grant (DFG) is funding provided by the council to help disabled people make changes to their home so they can live safely and independently. These adaptations can include things such as ramps, stairlifts, level-access showers, handrails, improved access to key rooms, and other changes that help people move around and use their home more easily.

DFGs are typically, but not always, used in privately owned or privately rented properties.

Thurrock Council delivers housing adaptations for council tenants through an HRA-funded scheme managed by the Housing Service.

Council tenants are not ordinarily required to submit a formal DFG application and this removes the need for means testing, reducing administrative burden and accelerating delivery.

The HRA-funded scheme is the Council's primary delivery route for council tenants.

Council tenants will not be treated less favourably than applicants in other tenures.

Where an adaptation is refused, significantly delayed, or where a tenant requests it, the Council will advise the tenant of their legal right to submit a formal DFG application. Any formal application will be processed in accordance with the statutory framework, including grant conditions and financial means testing (where applicable).

Where a council tenant submits a formal DFG application, the application will be assessed in accordance with statutory requirements and the same legal tests applied to all tenures.

Submission of a formal application does not create an automatic entitlement to a particular scheme of works.

Eligibility and Assessment Process

Eligibility

This policy applies to tenants and household members of properties owned by Thurrock Council within the Housing Revenue Account.

To qualify for assistance:

- the disabled person must be ordinarily resident in the property, living in it as their main home with no intention of living elsewhere permanently.
- the property must be structurally capable of accommodating the proposed works.
- the works must meet at least one statutory purpose under Section 23 of the 1996 Act.

Tenancy breaches or rent arrears will not automatically prevent assistance, though tenants are expected to engage with the Council to resolve such matters.

Assessment Process

Referrals may be made through Housing, Adult Social Care, or health professionals.

1. **Occupational Therapy Assessment**
   An Occupational Therapist (or suitably qualified assessor) will determine whether works are necessary and appropriate to meet the disabled person's needs.

2. **Technical Feasibility**
   Where major works are proposed, a technical officer will assess whether the works are reasonable and practicable having regard to the age, condition and structure of the property.

3. **Decision**
   Final approval rests with the Housing service as landlord and decision-making body.

4. **Delivery**
   Approved works will be commissioned through the Council's Housing Assets Team or approved contractors and inspected upon completion.

In assessing adaptation requests, the Council will have due regard to its duties under the Equality Act 2010 and will consider safeguarding concerns, risks to physical and mental wellbeing, and the impact on carers and household members.

Urgent or high-risk cases may be prioritised where evidence demonstrates significant risk to health, safety or wellbeing.

Where a disabled person has a terminal, life-limiting or rapidly progressive condition, the council will accept trusted professional evidence of urgency without requiring it to be repeated unnecessarily, and will take account of likely short-term progression when deciding what works are

necessary and appropriate. This does not change the statutory tests that apply to a formal DFG application; it changes the pace at which evidence is gathered and acted on.

Grounds for Refusal

The Council recognises its duties under the Housing Grants, Construction and Regeneration Act 1996 and associated guidance. However, approval of a specific adaptation is not automatic and each case will be considered on its individual merits.

An adaptation request may be refused where the Council determines that the proposed works are not reasonable and practicable having regard to the age, condition, structure or long-term suitability of the property.

Examples may include:

- where structural constraints significantly limit feasibility
- where abnormal or disproportionate costs arise
- where the property would remain unsuitable even after adaptation
- where works would not represent reasonable value for money
- where rehousing would provide a more suitable and sustainable solution
- where planning, building control, access or legal constraints prevent delivery

The existence of an identified need does not automatically entitle an applicant to a particular scheme of works.

Considering cases outside of the policy

Where a request falls outside the eligibility or funding criteria set out in this policy, the council will still consider it on its individual merits, having regard to the circumstances of the case. Reasons for the decision reached will be recorded and provided to the applicant.

Prioritisation Criteria

To ensure timely support for those in greatest need, the council will prioritise cases according to urgency and risk. The following categories will guide scheduling and resource allocation:

Priority Level	Criteria	Assessment Timeframe	Works Completion Timeframe
Critical	Cases where there is immediate and significant risk to health or safety (for example, a risk of serious injury from falls, inability to access essential facilities, or imminent discharge from hospital contingent on adaptation).	Within 5 working days of request receipt	Immediately, unless in the case of a major adaptation when planning permission or architects' drawings are required
High	Cases where the disabled person's independence is severely compromised and there is a high risk of deterioration or carer breakdown.	Within 15 working days of request receipt	Within 6 months of assessment
Medium	Cases where adaptations will significantly improve quality of life, reduce reliance on care and support prevention but there is no immediate risk.	Within 30 working days of request receipt	Within 12 months of assessment

Priority decisions will be kept under review, and urgent cases may be re-prioritised if circumstances change. The council will not operate waiting lists; instead, it will manage workflow to meet statutory timescales and allocate resources fairly.

Types of Adaptations

Adaptations delivered under this policy fall into the following categories:

1. **Access to and from the dwelling** – Providing ramps, level or widened pathways, threshold alterations, step lifts or door widening to enable the disabled person to enter and exit their home safely.

2. **Making the dwelling safe** – Installing enhanced alarms, shatterproof glazing, protective guards, strengthened walls or floors and other measures to protect the disabled person and household.

3. **Access to the principal family room** – Alterations to allow the disabled person to access and use the main living area of the home to socialise with the household.

4. **Access to a room usable for sleeping** – Alterations to enable the disabled person to access and use a bedroom safely, including where appropriate the creation of suitable sleeping accommodation.

5. **Access to a lavatory, bath, or shower and wash hand basin** – Providing or altering bathrooms so the disabled person can use them safely; case law and guidance indicates that strip washing is not considered appropriate beyond an interim period.

6. **Facilitating the preparation and cooking of food** – Enlarging or rearranging kitchens, lowering worktops, installing adjustable cupboards, and altering plumbing and electrics.

7. **Improving or providing heating systems** – Installing or upgrading heating or insulation where the existing system is unsuitable for the disabled person's needs.

8. **Facilitating use of power, light, or heat** – Repositioning switches or providing additional controls.

9. **Facilitating movement around the home to care for another person** – Adaptations that enable the disabled occupant to care for a person normally resident in the property.

10. **Other purposes specified by the Secretary of State** – Other purposes prescribed by legislation or regulations, including certain works that enable the disabled person to access facilities associated with the dwelling where permitted by law.

Minor Adaptations

Minor adaptations costing less than £1,000 will be funded from the council's Adult Social Care budget. Examples include:

- Grab rails, handrails, and bannisters.

- Lever style taps and door handles.

- Additional stair rails or half steps.

These works should be delivered quickly following a simple assessment by trusted assessors within Housing, or by occupational therapy staff. There is no means test and tenants are not required to contribute.

Major Adaptations

Major adaptations are those costing more than £1,000 and will usually require a capital expenditure from the council's housing budgets. Examples include:

- Level access showers or wet rooms.
- Bathroom extensions or conversions.
- Through floor or stairlifts.
- Door and corridor widening.
- Concrete access ramps.
- Accessible kitchens with adjustable units.
- Single storey extensions to provide ground floor sleeping or bathroom facilities.
- Hoists, ceiling track systems, and specialist bathing equipment.

Major adaptations may also include improvements to heating or insulation where necessary to meet the disabled person's needs.

Due to their complexity and cost, extensions and other high-cost structural adaptations will require:

- a full Occupational Therapy assessment
- technical feasibility assessment by Housing Assets or a suitably qualified surveyor
- cost appraisal and options analysis
- consideration of alternative solutions, including rehousing.

Approval will only be granted where the Council is satisfied that the works are necessary and appropriate, and reasonable and practicable in all the circumstances.

Funding and Responsibilities

Major adaptations for council tenants will normally be funded through the Housing Revenue Account capital programme.

Funding availability alone will not determine whether a mandatory adaptation need is met. However, when determining whether proposed works are reasonable and practicable the Council may consider:

- assessed need
- statutory tests
- value for money
- long-term sustainability of the property
- effective use of Housing Revenue Account resources

As landlord, the Council must consider the strategic use of its housing stock.

Where the Council determines that a property cannot reasonably be adapted, or where the required works would be disproportionate in cost, complexity or long-term sustainability, rehousing may represent the most appropriate and practicable solution.

Before reaching such a decision, the Council will:

- consider whether alternative adaptation options exist
- consult with relevant professionals, including Occupational Therapy
- consider the household's circumstances and support needs
- assess whether suitable alternative accommodation may reasonably meet the identified needs.

The Council will seek to work collaboratively with households in exploring rehousing options but retains discretion to determine that adaptation of a particular property is not reasonable and practicable.

The statutory £30,000 DFG maximum does not automatically apply to HRA-funded works delivered under this policy. However, where a formal DFG application is made, statutory grant limits and conditions will apply.

Applications, Appeals and Complaints

If a tenant disagrees with a decision made by the Housing service relating to an adaptation request, they may request a review within 28 days. Reviews will be conducted by a senior officer not involved in the original decision.

Council tenants are not ordinarily required to complete a formal DFG application; however, tenants retain the legal right to submit a formal DFG application at any time if they choose to do so. Where this occurs, the application will be processed under statutory requirements.

Further information regarding the Council’s approach to receiving, assessing and progressing DFG applications can be found on the Thurrock Council website.

Complaints about the delivery of adaptation services, including delays, communication, or the quality of works undertaken in Council-owned homes, will be handled through the Council's Housing Complaints Procedure. Following completion of the Council's complaints process, complaints relating to the Council's role as landlord may be referred to the Housing Ombudsman.

Complaints relating to the Council's statutory functions in assessing or determining a Disabled Facilities Grant application may be referred to the Local Government and Social Care Ombudsman once the Council's complaints procedure has been exhausted.

Monitoring, Measuring and Review

The council will monitor the delivery and impact of adaptations through performance indicators, such as:

- **Timeliness** – average time from referral to approval and from approval to completion.
- **Outputs** – number of minor and major adaptations completed; number of DFGs approved; total spend and average cost per adaptation.
- **Outcomes** – reduction in falls and hospital admissions, carer stress, and reliance on residential care.
- **Customer satisfaction** – feedback from tenants on the quality and impact of adaptations.
- **Equality monitoring** – uptake of adaptations across different age groups, disabilities, ethnicities, and tenures to ensure fairness.

Monitoring data will be reported quarterly to senior management and will publish summary statistics for transparency.

This policy will be reviewed every three years or sooner if there are significant changes in legislation, guidance, or local circumstances. Reviews will include consultation with tenants, carers, occupational therapists, housing staff, and local health and social care partners to ensure the policy continues to meet needs and reflects best practice. The council will update its Housing Adaptations Policy accordingly.

Policy Development Principles

Within the Transparency, Influence and Accountability consumer standard, published by the Regulator of Social Housing, it sets out that registered providers' housing and neighbourhood policies must be fair, reasonable, accessible, and transparent. Where relevant, policies should set out decision-making criteria and appeals processes.

Fairness

All tenants will be treated equitably. Eligibility and prioritisation are based on assessed need and risk rather than property type or personal characteristics. The council will not discriminate on grounds of age, disability, gender, race, religion, or another protected characteristic.

Reasonableness

Decisions will be informed by the statutory tests of necessity, appropriateness, reasonableness, and practicability. Works must represent good value for money, be proportionate to the need and take account of the property's condition. The council will consider alternative solutions, such as rehousing, only where adaptation is not a reasonable or practicable option.

Accessibility

Information about adaptations, funding and the application process will be available in a variety of formats (online, phone, in person, large print, audio and other languages). Staff will provide assistance to tenants who have difficulty completing forms or communicating their needs. The council will ensure that its offices, communications, and services are accessible to people with disabilities.

Transparency

The policy sets out clear criteria for eligibility, assessment, prioritisation, and funding. Applicants will receive written reasons for decisions, including any refusal or variation of works.

Decision-making criteria

In line with the 1996 Act and DFG guidance, decisions will consider: the statutory purposes of adaptation; the necessity and appropriateness of the works for the disabled person; whether they are reasonable and practicable given the property's condition; priority banding (critical, high, medium or low); and available budgets for discretionary adaptations. Social services will be consulted in all cases to ensure that works meet the person's health and care needs.

All decisions relating to major adaptations will be clearly documented and will include:

- the identified needs
- alternative options considered

- technical assessments
- reasoning regarding reasonable and practicable considerations
- cost of adaptation and funding considerations where relevant
- the rationale for approval, modification or refusal.

Written decisions will be sufficiently detailed to demonstrate compliance with statutory duties, equality obligations and this policy.

Appeals process

The policy provides a clear appeals process. Applicants may appeal within 28 days of a decision if they believe it does not comply with legislation, guidance, or this policy. A senior officer independent of the original decision will review the case and respond within 20 working days. If the applicant remains dissatisfied, they may pursue a complaint under the council's complaints procedure or refer the matter to the Housing Ombudsman.

Version Control

Version Details

Author	Robyn Riseborough – Housing Strategy Manager
Owner	Head of Housing Assets, Repairs and Compliance
Date drafted	July 2026
Approved by	Cabinet
Date approved	September 2026
Version	1.0
Next scheduled review date	September 2029

Amendment Record

Version Number	Date	Summary of changes
1.0	July 2026	Original version