

1.0 CONTEXT

- 1.1 Medical Adaptations assist tenants to live independently within their homes for as long as possible. This service is increasingly important given Glasgow and Scotland's aging demographic, with a growing proportion of older residents and those with long-term health conditions. As the needs of households evolve, the demand for adaptations that support mobility, accessibility, and independent living continues to rise, highlighting the importance of responsive and well-planned adaptation services
- 1.2 An occupational therapist provides a recommendation for adaptation (a CL1 form) on behalf of their client with the exception for minor adaptations (less than £350) such as handrails.
- 1.3 The Scottish Government, via Glasgow City Council, provides a budget to GWHa at the start of the financial year to fund Stage III Medical Adaptations to traditional GWHa stock. GWHa sets annual budget to undertake adaptations within transfer stock. Funding for Stage II Medical Adaptations (for newly developed/refurbished properties) is assessed as part of the development programme.
- 1.4 This policy should be read in conjunction with the GWHa Procurement Guide

2.0 AIMS

- 2.1 To provide clear policy guidelines for the approval of temporary or permanent adaptations to GWHa housing stock.
- 2.2 To ensure a systematic and objective response to all adaptation requests.
- 2.3 To ensure compliance with regulations, best practice and mitigate risk.
- 2.4 To support the independence and dignity of tenants by undertaking adaptations where possible to improve quality of life
- 2.5 To ensure GWHa makes best use of its stock and resource available by allocating vacant adapted properties to tenants with similar needs

3.0 DEFINITIONS

- 3.1 Adaptations are classified in two ways: by the stage at which they are undertaken (Stage II or Stage III) and by the scale of works required (Minor, Major, or Substantial).
- 3.2 *Stage II Adaptations* Pre-construction or new build adaptations carried out by the main contractor prior to building completion (during the construction phase). Public funding and grants may be available to fund Stage II works.
- 3.3 *Stage III Adaptations* Works to adapt a property to suit the needs of existing or new tenant where these could not reasonably have been identified when the property was originally allocated, as defined by the Scottish Government.
- 3.4 *Minor Adaptations* Low-cost adaptations such as key safes and handrails.
- 3.5 *Major Adaptations* Adaptations such as level access showers, wet rooms and the installation of wheelchair ramps/lifts/hoists.
- 3.6 *Substantial Adaptations* Adaptations such as property extensions, the amalgamation of rooms, wall removals, concrete ramps, structural alterations

4.0 POLICY

4.1 General

- 4.1.1 GWHa is aware of the importance of providing a range of accommodation to meet changing needs and actively works in partnership with other agencies to identify solutions that enable tenants to maintain independent living for as long as is possible and practical.
- 4.1.2 Requests for adaptations will be considered sympathetically and objectively, within budgetary and other constraints.
- 4.1.3 GWHa will promote the availability of the **Medical Adaptations Scheme** via its newsletter, website, house visits, over 75s visits and welfare rights services, and at other appropriate events.
- 4.1.4 Tenants will be encouraged to approach an occupational therapist for assessment and referral to GWHa excluding hand/grab rails. Any request for adaptations such as over the bath shower, wet rooms, level access showers will require an occupational therapist assessment and a CL1 form.
The CL1 form will not be required for hand/grab rails, so long as works do not exceed £350.
- 4.1.5 This policy applies to GWHa tenants. Home owners should visit <https://www.gov.scot/publications/funding-adaptations-home-guide-homeowners/> for information on adaptations.

4.2 Stage II Adaptations

4.2.1 **Stage II adaptations** refer to pre-construction or new-build adaptation works carried out by the **main contractor prior to building completion**. These adaptations are designed and implemented during the development phase to meet the identified or anticipated needs of future tenants.

4.2.2 GWha will liaise closely with the **Scottish Government, Glasgow City Council, Occupational Therapy Services**, and design teams to ensure Stage II adaptations are incorporated where appropriate to promote inclusive and accessible housing.

4.2.3 The inclusion of Stage II adaptations will be reviewed as part of project design and planning stages, ensuring compliance with **Building Standards** and the **Housing for Varying Needs** design guide.

4.3 Stage III Adaptations

4.3.1 **Stage III adaptations** involve works to modify an **existing property** to suit the needs of an existing or incoming tenant, where these requirements could not reasonably have been identified when the property was originally allocated.

4.3.2 Stage III adaptations are defined by the **Scottish Government's Medical Adaptations guidance** and are funded through the Scottish Government's adaptation programme, administered via **Glasgow City Council**

4.3.3 Adaptations are prioritised and approved based on OT recommendations, tenant need, and budget availability.

4.3.4 GWha will monitor and report on adaptation performance annually, including the number of referrals, completions, and any unmet demand due to funding or technical limitations.

4.4 Responsibilities

4.4.1 Adaptations can be categorised by both stage and scale.

- Stage II and Stage III adaptations describe when the work takes place (either pre-construction or post-allocation).
- Minor, Major, and Substantial adaptations describe the scale and complexity of works required.

Both frameworks are relevant within this section, as GWha's responsibilities vary depending on the stage, scale, and funding source of the adaptation.

4.4.2 GWha is responsible for carrying out adaptations to meet the needs of residents in GWha-owned accommodation, subject to Occupational Therapist referral, budget review, and tenancy sustainment considerations. Adaptations fall into three scale-based categories:

- a) **Minor adaptations** – As required under the Equality Act 2010, GWha will facilitate reasonable adjustments where a physical feature places a disabled tenant at a substantial disadvantage. These include modifications such as lever taps, grab rails, door-entry systems, and accessible power points.
- b) **Major adaptations** – GWha are not statutorily required to carry out larger, structural adaptations such as external handrails, widened doorways, specialist doors and windows, adapted kitchen units, and accessible bath or shower units. GWha will consider such requests based on available funding, property suitability, and long-term viability.
- c) **Substantial adaptations** - See section 4.8 for details of substantial or structural adaptations, which are considered in exceptional circumstances only.

GWha acknowledges its legal duty under the Equality Act 2010 to make reasonable adjustments for tenants with disabilities, primarily in relation to minor adaptations. Larger, structural adaptations are not a statutory requirement and are dependent on available funding. While GWha will consider requests on a case-by-case basis, the association reserves the right to determine the feasibility of adaptations in line with funding availability, property suitability, and operational priorities.

Section 5.5 outlines GWha's position regarding tenant's self-funding adaptations within their home.

4.4.3 Equipment installed to meet the needs of a particular disabled person, which is "removable" and "re-deployable" when no longer required, is the responsibility of Glasgow City HSCP (Social Work Services). Examples include additional internal grab rails, bath and toilet aids, telephone aids, special furniture, temporary ramps, door answering intercoms, individual emergency call facilities, removable stair lifts, laundry and cleaning equipment.

4.5 Stage III Funding

4.5.1 The current system for the funding of adaptations is tenure-based. For Registered Social Landlords, The Scottish Government, via Glasgow City Council, provides the annual allocation via the Housing Association Grant (HAG) Programme.

- 4.5.2 GWhA will make a bid for Stage III adaptations funding each year as part of the Strategy and Development Funding Plan. The bid will take account of historical expenditure, current and anticipated future applications and ability to resource the programme.
- 4.5.3 Responsibility for the administration and management of the Stage III budget rests with the Repairs Services Manager. Where it is anticipated that the budget will be depleted before all adaptations are carried out, a formal approach will be made to The Scottish Government for additional funding.
- 4.5.4 Authority to instruct works that exceed the available budget is required from the Services Director.
- 4.5.5 The Services Director will be responsible for the submission of grant claims. The Scottish Government preference is within one month of receiving an invoice for completed works, though will accept up to financial year end. The claim will include a 10% administration charge to reflect the cost incurred by GWhA in managing the process.
- 4.5.6 An internal budget is maintained by GWhA to support Stage III Medical Adaptations within the Hyndland and Argyle 2nd Stage Transfer areas, reflecting the requirement to self-fund these works under the stock transfer agreement.

4.6 Referrals

- 4.6.1 Requests for permanent Medical Adaptations (with the exception of hand/grab rails – see 4.1.4) must be received from an Occupational Therapist in the prescribed format to satisfy GWhA that the adaptation is suitable to meet the Tenant's needs, and to enable the cost of the works to be reclaimed from The Scottish Government.
- 4.6.2 Where a referral states that the Adaptation will not meet the Tenant's long-term needs, GWhA will contact the tenant with a view to completing a wider housing needs analysis to explore options to address long term needs.
- 4.6.3 In some exceptional cases, referrals are received from GPs for adaptations of an "incidental" nature (e.g. grab rail in close, key safes). In such cases, where the cost is less than £150, the works will be funded from GWhA's Reactive Maintenance budget and, where appropriate, subject to consultation with other residents¹. The OT referral will state the priority of the adaptation on the referral and if a site visit / options appraisal is required.
- 4.6.4 Each referral will be recorded in the Medical Adaptations Register, which will be used to track progress through to completion.
- 4.6.5 The Repairs Team will monitor progress and update both the Register and the housing database upon completion of works.

4.7 Site Survey / Options Appraisal

- 4.7.1 The Occupational Therapist will indicate on the referral whether a site visit or options appraisal is required. Where required, an appointment will be arranged within 10 working days for a Property Services Officer to meet with the tenant and complete an options appraisal form in consultation with them, to identify the most appropriate and sustainable long-term solution.
- 4.7.2 Opportunities for involving family members, Carers, the OT, GP or other relevant parties in the options appraisal will be explored and, where appropriate, a key contact will be established (e.g. where the tenant has a learning disability/mental health condition or is hospitalised). Interpretation/translation services will be employed where required.
- 4.7.3 The options appraisal will concentrate primarily on physical factors such as space and accessibility, but may also take account of social, psychological and support factors that are important to the tenant.
- 4.7.4 Where the Options Appraisal suggests that rehousing of the Tenant to more suitable accommodation is the ideal solution, GWhA will seek to contact the tenant with a view to exploring options to address long term needs.
- 4.7.5 Caution will be exercised in the Options Appraisal process where there is a referral for works to be carried out within family accommodation (i.e. 3 apt+) that is under-occupied by the existing household. This is to ensure GWhA are utilising housing stock and funding to full capacity.
- 4.7.6 If an options appraisal is not required, a contractor will be instructed within 10 working days to survey the property.
- 4.7.7 In all instances where an adaptation is approved, GWhA will issue formal written confirmation to the tenant outlining the approved works, scope, and estimated timescales for completion.
- 4.7.8 If adaptations are placed on hold for any reason, GWhA will provide written notification to the tenant to ensure they are fully informed of the circumstances and any expected next steps.

¹ Including Tenants and owners

4.8 Substantial Adaptations (as defined in section 3.5)

- 4.8.1 Substantial and/or structural adaptations to GWHHA properties (as defined in section 3.5) will be considered in exceptional circumstances only and when all other attempts to identify more suitable alternative accommodation (either within, or out with GWHHA housing stock) have been unsuccessful.
- 4.8.2 Where substantial adaptation is the only feasible option, the authority of the Services Director must be obtained prior to progressing statutory and/or other consents. Such as extensions, wall removal, structural changes, concrete ramps
- 4.8.3 Where the adaptation cannot be progressed, for whatever reason, the Tenant will be assessed as a priority for rehousing in accordance with the terms of the Housing Allocation Policy.

4.9 Adaptations to Common Areas

- 4.9.1 In properties wholly owned by GWHHA, the association will notify, and where appropriate, consult, all residents prior to instructing adaptations that impact on the common areas of the property (e.g. wheelchair ramps).
- 4.9.2 Where the property is mixed tenure, an application for consent will be sent in the prescribed form² to all owners affected by the proposed works. This will be sent by personal or recorded delivery. It will only be sent by email or other electronic mail if the recipient has previously agreed in writing to accept service in that way³.
- 4.9.3 The owners must respond to the initial notice within 1 month, by issuing a written reply in the prescribed form⁴ indicating their acceptance or refusal of the proposals made. If an owner does not respond within the timescales it is taken as a refusal. If owner refuses consent, they must identify the reason for that refusal. If giving consent to the alteration an owner is entitled to introduce reasonable conditions, and a list of possible conditions are supplied in the Regulations. If the condition proposed is not accepted by the disabled person, the owner's response will count as a refusal.
- 4.9.4 All votes will be counted, and a further notice will be sent to all owners in the prescribed form⁵ identifying the outcome. Work must only commence with the consent of the majority of the owner-occupiers affected by the proposed works.
- 4.9.5 A majority is taken to mean either:
- a) A person who owns more than one half of the share in the common parts: OR
 - b) The combined consent of those who together own more than one half of the share in the common parts.
- 4.9.6 Unless the applicant has entered into an agreement with the other owners of the common parts in relation to sharing costs of the adaptation, the applicant will be solely liable for the costs. The costs of the adaptation include the costs of maintenance and reinstatement works.
- 4.9.7 Where adaptation works are required for the benefit of an owner-occupier, GWHHA, in its capacity as an owner occupier factored by GWEn, will consider the request sympathetically and within the same policy principles that apply to GWHHA properties. Responsibility for the initial installation costs and for the future maintenance, repair, replacement and/or removal of the adaptation will be clearly outlined in a formal agreement with the owner in question, prior to commencement of works.

4.10 Adaptation Priorities

- 4.10.1 Stage III Referrals are assessed on a gradient of 1-3 with Critical being the highest priority. The Occupational Therapist will determine the level of priority awarded to each referral.
- 4.10.2 GWHHA will utilise the OT priority system as the basis for its own priority system which has been introduced as a means of ensuring there are opportunities for all adaptations to be carried out within a reasonable timescale.
- 4.10.3 The points system will operate as follows:

Critical (P1)	30 points
Substantial (P2)	20 points
Moderate (P3)	10 points

² SCHEDULE Part 1: Form of application for consent to relevant adjustments, Regulation 5(2) [The Relevant Adjustments to Common Parts (Disabled Persons) (Scotland) Regulations 2020]

³ [T.C. Young](#) [February 2021]

⁴ SCHEDULE Part 2: Notice of decision of owner of a property with a share in the common parts of the premises, Regulation 5(4) [The Relevant Adjustments to Common Parts (Disabled Persons) (Scotland) Regulations 2020]

⁵ SCHEDULE Part 3: Notice of Majority Decision, Regulation 7(1) [The Relevant Adjustments to Common Parts (Disabled Persons) (Scotland) Regulations 2020]

In addition to the priority points 5 “time in need” points will be allocated at the end of each full quarter that the referral has been on the database. In practice, this will operate as follows:

A P3 application received on 01/04/25 would receive 10 points (+) an additional 5 points on 01/07, 01/10 and 01/01, making a total of 25 points at the beginning of January 2025. In the event of funding and/or resource constraints, the P3 referral would then take priority over a P2 application received in December 2025.

4.11 Works Instruction & Procurement

- 4.11.1 Approved Medical Adaptation works will be instructed at the earliest opportunity, with a clear specification, to an appointed Contractor who specialises in the works required. The appointed contractor must be sufficiently resourced to carry out the works within a reasonable timescale to be determined by GWHG.
- 4.11.2 Works will be instructed in accordance with delegated authority levels detailed within the GWHG Procurement Guide.
- 4.11.3 Medical Adaptation works are “zero rated” for VAT. Accordingly, works are VAT taxable by the contractor, but the rate of VAT GWHG are charged must be 0%. To be zero rated for VAT, works must be for someone with a physical or mental impairment that has a long-term effect on their ability to do everyday activities.

4.12 Tenant Liaison

- 4.12.1 GWHG Staff will maintain regular contact with the tenant throughout the course of the work, where appropriate, and concerns by, or on behalf of the Tenant, will be addressed as a matter of urgency.
- 4.12.2 The Tenant’s satisfaction with the process, the contractor, and with the completed works will be assessed. This will be arranged within 10 working days of the completed installation, with responses informing future policy reviews and the annual review of contractors.

4.13 Maintenance & Life Cycle Costings

- 4.13.1 GWHG is responsible for the future maintenance and repair of permanent Medical Adaptations. Expenditure is met through the reactive maintenance budget and will be closely monitored via a cost centre established for this purpose.
- 4.13.2 Repairs to Medical Adaptations will be treated as priority for response and where possible, will be completed under the category of “emergency”.
- 4.13.3 The expectation is that the future replacement of Medical Adaptations will be carried out through planned replacement works if the adaptation has reached the end of its life cycle.

4.14 Future Allocation of Adapted Properties

- 4.14.1 GWHG will aim to re-cycle adaptations as far as possible and will resist requests from future Tenants to remove them from the property.
- 4.14.2 Where a “temporary/removable” adaptation is no longer required by an existing Tenant, Glasgow City HSCP (Social Work Services) will be contacted and given the opportunity to uplift it.
- 4.14.3 Where major/substantial “permanent” adaptations have been carried out to a property (e.g. wheelchair/stair lifts, ramps, kitchens, wet floor showers) every effort will be made to ensure future allocation to an applicant who requires adaptations of the nature provided.
- 4.14.4 Where a suitable applicant is not readily identifiable from GWHG’s sources, a referral from a specialist agency/RSL/S5 Referral will be sought by the Tenancy Services Team.
- 4.14.5 The prospective Tenant will be expected to visit the property, and confirmation will be required that the adaptation is appropriate and that no further adaptations (other than those of a minor nature) will be necessary to make the property suitable for the applicant’s needs. GWHG will invite the OT/Carer or other representative and their assessment as to whether the allocation would satisfy the applicant’s needs will be requested.

4.15 Recovery of Adapted Properties

- 4.15.1 Under the terms of the Housing (Scotland) Act 2014, GWHG may seek to recover possession of an adapted property where it has been allocated to persons who do not need adaptations and rehouse any such persons in suitable alternative accommodation.

5.0 FEEDBACK & COMPLAINTS

- 5.1 Any Tenant who is aggrieved by a decision made in the context of this policy has a right of Appeal via GWHA's Comments and Complaints Policy.
- 5.2 Once the Association's Comments and Complaints Policy is exhausted, there is a right of appeal to the Scottish Public Services Ombudsman (SPSO). As the SPSO is unlikely to comment on matters of a legal nature, a review will focus on the proper application of the Association's policy, rather than the specifics, or legalities, of the medical adaptation.
- 5.3 In the event consent for an adaptation is refused, or given subject to a condition, the Tenant has the right to refer the refusal to the sheriff court.
- 5.4 If the appeal pertains to a refused adaptation to a common part, the appellant must give notice of the appeal to all owners affected by the proposed works. Appeals to be managed in compliance with specifications of The Relevant Adjustments to Common Parts (Disabled Persons) (Scotland) Regulations 2020, Section 10: Appeals and must be lodged within 21 days of the decision.
- 5.5 In the event funding for the stage III adaptation is not available, GWHA will consider any request for the tenant to carry out and self-fund works in line with the Alterations and Improvements policy.

6.0 REVIEW

- 6.1 This Policy will be reviewed every 5 years, or sooner, subject to a change in legislation or circumstance.
- 6.2 The policy, in parts, attempts to summarise current legislation. In any case of conflict between the two, legislation will preside.

7.0 DELEGATED AUTHORITY

- 7.1 Delegated authority is granted by the Management Committee to the Chief Executive and Staff to implement this Policy.

GWHA Funded (Second Stage Transfer)	Unit Source	Stock
Baliol Street	Argyle LHO	Second Stage Transfer
Berkeley Street – 104, flat G/1 and 122, flat 3/3 only	GCC Acquisition Programme	
Blythswood Court - Columba	Argyle LHO	Second Stage Transfer
Blythswood Court - Davaar	Argyle LHO	Second Stage Transfer
Blythswood Court - Dalriada	Argyle LHO	Second Stage Transfer
Byres Road - 133, flat 3/1	Argyle LHO	Second Stage Transfer
Cheapside Street	Argyle LHO	Second Stage Transfer
Crown Road North	Hyndland LHO	Second Stage Transfer
Dalhousie Street	Argyle LHO	Second Stage Transfer
Dowanhill Street	Argyle LHO	Second Stage Transfer
Gardner Street	Argyle LHO	Second Stage Transfer
Great Western Road	Argyle LHO	Second Stage Transfer
Highburgh Road	Hyndland LHO	Second Stage Transfer
Hyndland Road	Hyndland LHO	Second Stage Transfer
Keith Court	Argyle LHO	Second Stage Transfer
Oakfield Avenue - 23, flats 1/1, 2/2 and 3/1 only	Argyle LHO GCC Acquisition Programme (1/1 and 2/2)	Second Stage Transfer
Otago Street	Argyle LHO	Second Stage Transfer
Park Road - 29, flats 0/2 and 1/1 only	Argyle LHO GCC Acquisition Programme (0/2)	Second Stage Transfer
Peel Street	Argyle LHO	Second Stage Transfer
Prince Albert Road	Hyndland LHO	Second Stage Transfer
Princes Place	Hyndland LHO	Second Stage Transfer
Rupert Street	Argyle LHO	Second Stage Transfer
South Woodside Road	Argyle LHO	Second Stage Transfer
St Georges Road	Argyle LHO	Second Stage Transfer
St Vincent Terrace	Argyle LHO	Second Stage Transfer
Walker Court	Argyle LHO	Second Stage Transfer
West Graham Street	Argyle LHO	Second Stage Transfer
White Street	Argyle LHO	Second Stage Transfer
Woodlands Road	Argyle LHO	Second Stage Transfer

SHG (Government Funded)	Unit Source	Stock
Argyle Street	Philemon HA	Traditional
Athole Gardens	Hillhead HA	Traditional
Bank Street	Hillhead HA	Traditional
Belmont Street	Hillhead HA	Traditional
Beltane Street	Sandyford HA	Traditional
Berkeley Street – all except 104, flat G/1 and 122, flat 3/3	Sandyford HA	Traditional
Breadalbane Street	GWHA	Traditional
Brechin Street	GWHA	Traditional
Burnbank Gardens	Burnbank Gardens HA	Traditional
Burnbank Terrace	Burnbank Gardens HA	Traditional
Byres Road	Hillhead HA	Traditional
Claremont Street	Sandyford HA	Traditional
Cleveland Street	Avalon Corner Co-op	Traditional
Colebrooke Street	Hillhead HA	Traditional
Colebrooke Street	Hillhead HA	Traditional
Derby Street	Philemon HA	Traditional
Dorset Street	Sandyford HA	Traditional
Dover Street	New Build	Traditional
Elderslie Street	Sandyford HA	Traditional
Hillhead Street	Hillhead HA	Traditional
Kelvingrove Street	GWHA	Traditional
Kent Road	Avalon Corner Co-op	Traditional
Kew Terrace	Kelvin HA	Traditional
Mcintyre Street	Philemon HA	Traditional
Napiershall Street	Burnbank Gardens HA	Traditional
North Woodside Road	Burnbank Gardens HA	Traditional
Pembroke St	Sandyford HA	Traditional
St Vincent Crescent	Philemon HA	Traditional
St Vincent Street	GWHA	Traditional
University Avenue	Hillhead HA	Traditional
University Place	Hillhead HA	Traditional
West Princes Street	GWHA	Traditional