



## **Accessibility and Inclusive Design Policy**

**Approval date: July 2019  
Review date: July 2022**

## This policy applies to

- |  |  |  |   |
|--|--|--|---|
| <input checked="" type="checkbox"/> Link Group | <input checked="" type="checkbox"/> Link Housing | <input type="checkbox"/> Link Living   | <input checked="" type="checkbox"/> Link Property |
| <input checked="" type="checkbox"/> Horizon    | <input checked="" type="checkbox"/> Larkfield    | <input type="checkbox"/> West Highland | <input type="checkbox"/> Lintel Trust             |

## Policy Summary

Accessible homes are vital to the services delivered by Link Group and are particularly key to meeting our objective to provide homes and ensure that they are well maintained, efficient to heat and adaptable as people's needs change.

The policy will cover the range of services which contribute to providing accessible homes to enable our tenants, including those who are disabled and/or older, to live independently at home. This will confirm the links between strategic planning to increase the extent to which new housing is designed for a wider range of needs and abilities, the planned maintenance and repair programmes, the allocation of our housing stock and finally the adaptation of our housing to meet the changing needs of people already living in our houses or prospective occupants.

## Equalities

This policy fully complies with Link's Equality, Diversity and Inclusion Policy.

## Privacy

This policy fully complies with the Data Protection Act 2018 and Link's Data Protection Policy and all information processed by Link will be in accordance with this.

### Policy Owner

Director of Development  
and Asset Management

### Review Manager

Inclusive Design Manager

### Approved By

Senior Management  
Group

### Revision History

Date	Version Number	Comments
20 Dec 2018	1.0	For discussion with subsidiaries
12 June 2019	1.1	Revised with subsidiary feedback
22 July 2019	1.2	Revised with additional subsidiary feedback

## 1. INTRODUCTION

This policy demonstrates how Link Group will support tenants and enhance their mobility, safety and independence through the provision of accessible housing. The policy will therefore cover the range of services which all contribute to providing accessible homes to enable our tenants, including those who are disabled and/or older to live independently at home and will highlight the links and joint working between:

- a) the strategic development plan to increase the number of new build properties and the extent to which new housing is designed for a wider range of needs and abilities,
- b) the planned maintenance and repair programmes and the accessibility of replacement facilities,
- c) the appropriate allocation of our existing and new housing stock where prospective tenants' needs are identified and matched to a property appropriate to their need and
- d) the adaptation of our new build and existing housing stock to meet the changing needs of people already living in our houses and/or prospective tenants and their families.

The policy may benefit people of any age but will play a vital part in enabling older and disabled people to remain in a home of their own, independently or with support and care. This may be achieved though re-location to a property more suitable to meet their current and long-term needs or through the appropriate adaptation/refurbishment of their existing home. Where appropriate, alterations will be designed to be inclusive and increase the extent to which the property meets statutory, technical and design guidance for accessibility.

The purpose of the policy is to facilitate positive responses to the changing needs of tenants already living in our properties or prospective tenants, which contributes to achieving many of the outcomes set out in the Scottish Social Housing Charter. It is also a component in achieving the aims of related strategies and complements related policies including:

- Equality, Diversity and Inclusion Policy
- Tenancy Sustainment Strategy
- Sustainability Policy
- Asset Management Strategy
- Property Maintenance Policy
- Procurement Policy
- Standing Orders
- Allocations Policy
- Design Guide
- Technical Brief

## 2. PRINCIPLES

The following principles govern the operation of this policy:

- A collaborative approach to the inclusive design of housing and housing alterations across Link (where appropriate/practicable) to improve the overall accessibility for current and future tenants.
- Adopting and applying a social model of disability which recognises the physical and attitudinal barriers which can obstruct equality, independence, choice and control.
- Appropriate investment in accessibility will ensure suitability of Link's assets to enable our tenants, including those who are disabled and/or older to live independently for longer at home.
- A person-centred and outcomes focused approach which includes being proactive in offering timely advice on options reflecting the person's needs and their family (where appropriate).
- Fair and consistent in application: being clear about policy, procedures and prioritisation; ensuring equal access and a consistent standard (which does not mean offering everyone the same).
- Promotes inclusion and independent living by removing environmental barriers which often limit or prevent a person with a disability from fully participating in social, occupational and recreational activities. For example, stairs, steps, narrow doorways, heavy doors, poor lighting, poor acoustics.
- Encourages self-assessment of low-cost adaptations where appropriate and their speedy delivery and delivers more extensive adaptations when required, designed wherever practicable to enhance the accessibility of the property overall.
- Transparency and clarity, so that processes, procedures and decisions are quick and clear, and tenants and staff can understand parameters/options, costs and prioritisation, where this is necessary to determine an appropriate solution.
- Efficiency and demonstrating value for money: an approach that delivers cost efficiency, without compromising individually tailored service provision but also considers how to maximise long term benefit to property accessibility, reletting potential and futureproofing.
- Achieves high levels of satisfaction in service provision and quality of the home.
- The recording of property adaptability to inform future planning.

## 3. OBJECTIVES

The objectives of this policy are to provide:

- 1) A new build housing programme that includes a range of levels of accessible housing (including wheelchair accessible and exemplar designs) which
  - remove potential barriers,

- permit specific requirements for Stage 2 Adaptations (before practical completion of construction) and
  - accommodate future requirements for Stage 3 Adaptations (for an existing or future tenant) with minimal disruption.
- 2) Asset planning and planned maintenance programmes which take account of the tenant/user needs, property type and the opportunity to improve access to facilities by removing potential barriers and avoiding the need for future adaptations. For example: by offering a more accessible shower under the bathroom replacement programme.
  - 3) Contribution to the housing allocation process which facilitates early identification of prospective tenant requirements for house-types/adaptations and confirms the current and future suitability of properties to meet those requirements.
  - 4) An adaptation service which provides home alterations to meet the needs of existing (or prospective) tenants to enable them to remain in a home of their own and/or maintain their independence for longer and improve the quality of life.
  - 5) Contribution to the facilities services provided for each area office to identify and remove potential barriers and improve access to facilities for staff and visitors where appropriate.

#### 4. APPROACH AND METHOD

The Senior Management Group [SMG] in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All relevant employees have a responsibility to ensure that this policy is applied as instructed.

The policy applies to properties wholly owned by Link and to tenants and others who live in these properties as part of the household. The policy may therefore benefit people of any age, including children.

The policy affects existing tenants but also covers circumstances where new housing is being allocated to a tenant/ household with particular needs and/or where the completed or nearly completed property requires adaptation.

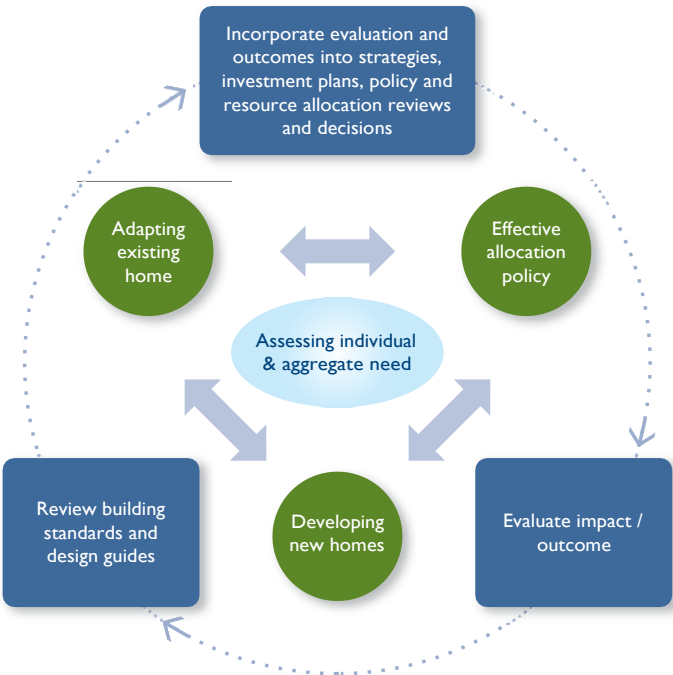
Link's Design Guide, Technical Brief and Asset Management Strategy address objectives to achieve excellence in inclusive design and minimise the cost of future adaptations. Outcomes from the application of this policy will be used to revise and improve design and specifications where appropriate.

Achieving and/or improving the accessibility of housing for tenants relies on the co-ordination of four main service areas: adaptation, new build design, asset planning and effective allocation.

Providing adaptations is a needs-led service to make alterations to a property to meet a tenant's specific needs and improve accessibility but the demand and need for adaptations is influenced by Link's existing services: the design of new build

properties and planned maintenance improvements has the potential to avoid the need for further adaptations/alterations. Likewise; the principles of the allocations policy has the potential to ensure suitable properties are identified (or adaptable properties) to match the needs of potential tenants, thereby making best use of accessible/adapted stock and/or identifying the need for further adaptations.

The policy therefore supports a whole system approach which advocates the strong link between the development of new homes, support for adaptations and effective allocation of homes as highlighted by the research estimating the housing needs of wheelchair users in Scotland. (Horizon Housing Association (2018), Still minding the step? A new estimation of housing need among wheelchair users in Scotland.)



The policy will be implemented using the following approaches:

**4.1. New build developments**

Link has an extensive programme for new build developments which includes housing to meet general needs as well as the aim to provide a minimum of 10% of properties to a wheelchair accessible standard. Providing accessible homes will enable Link’s tenants, including those who are disabled and/or older to live independently and safely at home for longer. Therefore, an inclusive design approach will identify and remove potential barriers for tenants and ensure Link’s new build properties will enhance their mobility, safety and independence.

**4.2. Asset Planning and Planned Maintenance Programmes**

The Asset Planning team complete a rolling programme of regular, stock condition surveys which update Link’s stock condition database. Cost and condition-based life cycles are applied to all building components requiring renewal and cyclical

maintenance, allowing programmes of work to be created which reflects condition and aligns to budgetary requirements. The planned maintenance programme will support tenants/service users and enhance their mobility, safety and independence by identifying and assessing housing stock already adapted and those capable of benefiting from accessibility improvements. By enhancing the accessibility of the property, for example through the installation of an accessible bathroom, this approach therefore also seeks to improve the overall accessibility of the existing housing stock.

### **4.3. Housing Management and Allocations**

Link is committed to providing good quality, affordable rented accommodation for people in housing need and aim to maximise opportunities for access to housing and allow applicants to make informed choices. Staff will support applicants and tenants and enhance their mobility, safety and independence by means of an informed and effective lettings service and allocations policy which matches tenants needs and property suitability as prescribed in current legislation.

### **4.4. Adaptations**

Adaptations are provided as a delegated function of Integration Joint Boards and Link is committed to supporting an integrated and partnership approach beyond its landlord responsibilities. The Accessibility and Inclusive Design policy has been developed in recognition of national and local policies awareness of the need to improve the management and delivery of adaptations and technology enabled care. Link also recognises that adaptations are not always feasible (whether technically or practically) and are not always ideal but can have a significant positive impact for the user and therefore, this policy sets out how, and in what circumstances, Link supports tenants by providing adaptations and alternative solutions:

- **Customer centred approach**

Link is committed to delivering a customer centred adaptation service and an inclusive design approach to major adaptations will ensure they meet the current but also the future needs of tenants where appropriate. Link also recognise the invaluable contribution disabled people and their families can make to the design and delivery of adaptations and the importance of collaborative working to harness their experience and expertise.

- **Funding**

Link apply for government grant funding for adaptations which have been assessed as being essential by a suitably qualified person but also set aside an annual provision to avoid delays and ensure a continuous service while the grant award level is being confirmed and to cover a shortfall in funding.

Local management arrangements may apply where respective group RSLs will apply their discretion, where funding is available, to fund adaptations deemed appropriate and necessary.

Link will consider a prioritisation system if all funding has been exhausted.

- Housing Options

Link adopt a Housing Options approach when adaptations are not technically or practically feasible. This information and advice process has a focus on people's personal circumstances and supports them to explore all their housing options whether with Link as their housing provider or other housing associations or through council and private accommodation. The process can also provide support for other underlying issues and works with other services to avoid reaching a crisis point.

## 5. MONITORING OF THE POLICY

The following areas will be subject to monitoring on a regular basis:

- Adherence to policy requirements and procedures
- Risk levels
- Provision of training and / or information to staff
- Expenditure, income and arrears monitoring.

These areas will be monitored by appropriate Managers within Link and reported on regularly to the relevant Director. If any significant issues of concern arise these will be dealt with by the Director of Development and Asset Management who will report such matters to his/her Board. Any matter which demonstrates a serious failure of internal controls should also be reported immediately to the Chief Executive.

## 6. COMPLAINTS AND APPEALS

Link Group welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The CHP allows for most complaints to be resolved by front line staff within a five day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20 day limit (second stage). At the end of the second stage our response will be made by a director. If the customer remains dissatisfied, he/ she may then refer the matter to the SPSO.

The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the First-tier Tribunal (Housing and Property Chamber).

Anyone receiving care or support service from us has the right to complain either direct to the Care Inspectorate or to us.

At each stage Link Group will advise the customer how the complaint should be taken forward and advise which agency would be most appropriate to consider the case.



## **7. POLICY AVAILABILITY**

A summary of this policy can be made available in a number of other languages and other formats on request.

## **8. POLICY REVIEW**

Link Group undertake to review this policy regularly, at least every three years, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

## Privacy Impact Assessment Screening Questions

Carrying out a Privacy Impact Assessment [PIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

Please tick the applicable statement(s) below. Will your project involve:

1. A substantial change to an existing policy, process or system that involves personal information  Yes  No
2. A new collection of personal information  Yes  No
3. A new way of collecting personal information (for example collecting it online)  Yes  No
4. A change in the way personal information is stored or secured  Yes  No
5. A change to how sensitive information is managed  Yes  No
6. Transferring personal information outside the EEA or using a third-party contractor  Yes  No
7. A decision to keep personal information for longer than you have previously  Yes  No
8. A new use or disclosure of personal information you already hold  Yes  No
9. A change of policy that results in people having less access to information you hold about them  Yes  No
10. Surveillance, tracking or monitoring of movements, behaviour or communications  Yes  No
11. Changes to your premises involving private spaces where clients or customers may disclose their personal information (reception areas, for example)  Yes  No

*If you have answered 'Yes' to any of these points, please complete a full Privacy Impact Assessment. If you have answered 'No', you need take no further action in completing a Privacy Impact Assessment.*

## Equality Impact Assessment Screening Questions

Will the implementation of this policy have an impact on any of the following protected characteristics?

- |                                   |                              |  |
|-----------------------------------|------------------------------|--|
| 1. Age                            | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Disability                     | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Gender reassignment            | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Marriage and Civil Partnership | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. Pregnancy and Maternity        | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Race                           | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. Religion or belief             | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. Sex                            | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. Sexual orientation             | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

*If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.*