

Disability Modifications Policy

(Policy)

Version 3

This policy has been adopted by:

Name of Company	Adoption Date
Community Housing Limited	June 2024
Community Housing (Vic) Ltd	June 2024
Community Housing (Tas) Ltd	June 2024
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1. OBJECTIVES AND APPLICATION

Community Housing Limited and its related entities that have adopted this Policy (the **CHL Group**) to

- ensure consistent property practices.

This Policy applies to all employees of the CHL Group. Violation of this Policy can lead to disciplinary action, include termination.

2. DEFINITIONS

Throughout this policy, the following definitions apply, unless otherwise stated:

Term	Meaning
CHL Group	means Community Housing Limited and each of its related entities that have adopting this policy.
HO	Housing Officer
SM	State Manager
SOM	State Operations Manager
RMO	Responsive Maintenance Officer
RMC	Responsive Maintenance Coordinator
OT	Occupational Therapist
GP	General Practitioner
SAFM	State Asset and Facilities Manager

SAFT	State Asset and Facilities Team
NAM	National Asset Manager
AO	Asset Officer

3. APPROVED POLICIES

3.1. Disability Modifications Policy

Community Housing Limited Group of Companies (CHL) houses many customers with a disability or mobility impairments and is committed to ensuring the accommodation in which they are housed is appropriate for their needs. CHL understands that a customer's needs can change over time and seeks to support residents with a disability or mobility need affecting their ability to carry out normal day-to-day activities, to live independently in their home and enjoy a good quality of life.

4. AIM

The Disability Modifications Policy aims to ensure consistent property practices. It includes standards and principles for the management of non-standard fixtures and terminology, definitions and reporting to be applied across CHL nationally in the application of our integrated business systems and tools. Where a property is enrolled as Specialist Disability Accommodation with the NDIA then this policy also applies.

Disability modifications cover a number of items, which include but are not limited to:

- Grab rails
- Suitable access options (i.e. ramps, automatic doors, etc)
- Flick mixer tapware
- Switch mechanisms
- Level access showers
- Kitchen modifications
- Floor coverings
- Lifting equipment

This policy will support CHL operations to:

- Provide appropriate adaptations to allow for independent living.
- Ensure consistency through the development of a national approach.
- Improve internal communication between departments of CHL.
- Improve tools and training for all CHL staff working in operational environments.
- Enhance the ability of asset maintenance and housing teams to communicate effectively with renters/tenants.
- Reduce maintenance costs.
- Ensure consistent use of terminology across jurisdictions.

5. PRINCIPLES

These principles guide the overall management of all disability modifications. This standardised approach ensures the organisation can apply a national standard within each jurisdiction, including compliance with National and State based regulations, industry standards, contractual obligations, legislation and organisation policies and procedures.

Principles for managing non-standard fixtures include, but are not limited to:

- Assessment and evidence of needs.
- Determination of appropriate adaptations.
- CHL Asset Standards Guidelines applied.

The organisation uses this policy as a governing document to support the process of handling non-standard fixtures effectively and efficiently and with clear communication, ensuring the delivery of safe, clean and habitable properties to future tenants.

6. ASSESSMENT AND EVIDENCE OF NEED

Renters/Tenants (or a registered householder) can make requests for adaptations and modifications to better meet their needs and CHL will formally assess all requests for disability modifications. Requests should be lodged with the Contact Centre or through their Housing Officer and/or using the Disability Modifications and Aids Request form.

Housing Officers can assist renters/tenants to make requests where appropriate. The renter/tenant will need to demonstrate that the request is for mobility, health or safety reasons and obtain the relevant supporting documentation. CHL will support renters/tenants and/or householders, where possible, to access external funding for major works such as widening of doorways, air conditioning systems or accessible facilities.

Requests made on the standard form must be accompanied by an Occupational Therapist's (OT) report and/or a letter from the renter's/tenant's general practitioner, specialist, or other healthcare professional. In some cases, minor requests such as grab rails may be considered without an OT's report or supporting documentation, at CHL's discretion.

Completed requests will be assessed by CHL State Asset and Facilities Team. As part of the assessment, Responsive Maintenance Officers (RMO's) may need to inspect the property to assess the building for the modifications requested.

Should a renter/tenant or registered householder wish to install (at their own cost) adaptations, either permanent or temporary in nature, for facilitating independent living in their home, CHL will not unreasonably deny such a request. These particular adaptations will not be maintained by CHL.

In some instances an upgrade might be paid by CHL, in which case the SAFM can sign off on works within their delegation, and anything above will be by SM. Discussions around these upgrades should occur in consultation:

- With housing to determine if there are suitable alternative properties for the customer to move to, and
- With Development Managers to ensure we are not making modifications to a property that is likely to be redeveloped.

7. DETERMINATION OF APPROPRIATE ADAPTIONS

The RMO will make a recommendation for appropriate adaptations based on:

- Primarily, the consideration of the adaption to a dwelling will rely on the cost-effectiveness of the upgrade in relation to the economic life of the dwelling. The assessment of this needs to be made in conjunction with the State Development Manager.
- The circumstances of and the evidence supplied by the renter/tenant and/or householder.
- A sound knowledge of building regulations and asset maintenance.
- The total cost of the required upgrade.
- Whether CHL has authority to make modifications to the property, dependant on the program and/or contract under which the property is managed.
- Consultation with the housing officer, renter/tenant and/or health care professional.
- For SDA dwellings, a review of the modifications considering SDA design compliance (where required with an SDA Certifier).¹
- Alternative strategies, including re-housing the renter/tenant in more appropriate housing.
- The likelihood of further adaptations or modifications being needed by the renter/tenant in the near future.

A response will be provided from the Responsive Maintenance Officer to the renter/tenant in writing, within 10 business days of receipt of the request. If external assessment is required for the modification, we will ensure the renter/tenant is kept informed of progress.

CHL follows the NDIS practice Standards and Quality Indicators, and as such:

- Acknowledge and understand each participant's legal and human rights, and incorporation of these rights into everyday practice, including through reasonable adjustments or modifications to the dwelling to meet each participant's needs.
- Where a change in participant needs or circumstances occurs, reasonable adjustments are made to accommodate the changes. If the changed support needs exceed the design category or functionality of the dwelling, work is undertaken to modify the dwelling, following consideration of the impact of the modifications on the other tenants (if applicable).

8. RESOLUTION OF DISPUTES

Renters/tenants and/or householders have a right to appeal any decision made by CHL they believe is incorrect, unfair or unlawful. Renters/tenants who wish to appeal a decision made by CHL can do so using the CHL Appeals Process.

9. RELATED MATERIAL

The following material relate to and inform further interpretation of this policy:

9.1. External References – Standards

Australian Standard AS 4299-1995, Adaptable housing
<https://www.saiglobal.com/PDFTemp/Previews/OSH/As/as4000/4200/4299.pdf>

9.2. External References – Regulatory codes

Victoria
<https://www.vba.vic.gov.au/building/regulatory-framework>

Queensland
<http://www.hpw.qld.gov.au/construction/BuildingPlumbing/Building/Pages/BuildingAccessPeopleDisability.aspx>

Western Australia
<https://www.commerce.wa.gov.au/corporate/disability-access-and-inclusion>

South Australia
<https://www.sa.gov.au/topics/planning-and-property/land-and-property-development/building-rules-regulations-and-information/the-building-code-of-australia>

Tasmania
<https://www.cbos.tas.gov.au/topics/technical-regulation/building-standards/building-practitioners/disability-access>

New South Wales
<https://www.planning.nsw.gov.au/~media/Files/DPE/Manuals-and-guides/a-guide-for-councils-and-applicants-housing-for-seniors-or-people-with-a-disability-sepp-seniors-living-2004-05.ashx>

Northern Territory
<https://dipl.nt.gov.au/industry/technical-standards-guidelines-and-specifications/buildings>

National Construction Code
<https://ncc.abcb.gov.au/>

9.3. External References – Industry framework

Scope
<https://www.scopeaust.org.au/quality-framework/>

NDIS
<https://www.ndis.gov.au/providers/housing-and-living-supports-and-services/specialist-disability-accommodation>

Department of Social Services (Australian Government)
<https://www.dss.gov.au/disability-and-carers/programs-services/for-people-with-disability/ndis-quality-and-safeguarding-framework-0>

NSW LAHC Asset Management Framework
https://www.dpie.nsw.gov.au/_data/assets/pdf_file/0004/350293/Asset-Management-Framework-November-2020.pdf

Scope
<https://www.scopeaust.org.au/quality-framework/>

9.4. External References – Legislation

Department of Community Services (ACT)
<https://www.dss.gov.au/our-responsibilities/disability-and-carers/standards-and-quality-assurance/national-standards-for-disability-services>

NDIS Quality and Safeguards Commission
<https://www.ndiscommission.gov.au/about/legislation-rules-policies>

NDIA
<https://www.ndis.gov.au/providers/housing-and-living-supports-and-services/specialist-disability-accommodation/sda-design-standard>

Disability Services Commissioner
<https://www.odsc.vic.gov.au/about-us/legislation/>

9.5. External References – Charters

DHHS (Vic) Client Services Charter
<https://dhhs.vic.gov.au/publications/client-services-charter>

Department of Social Services (Australian Government)
<https://www.dss.gov.au/our-responsibilities/disability-and-carers/programmes-services/disability-employment-services>

10. MONITORING AND REVIEW

This policy is maintained and managed by the CHL Group’s Chief Operations Officer.

Revisions will be made as and when required, with reviews not exceeding two years. The date for review of this document is on or before June 2026. This document remains valid until such time that a new version is published.

Review History

Document reference	Date Approved	Version	Reason for review	Review frequency	Owner	Approver(s)
POLHOUAUSNATDMO202403	June 2024	3.0	Scheduled review & template update	Every two years	Chief Operations Officer	Chief Governance Officer
POLHOUAUSNATDMO202202	June 2023	2.2	NT Inclusion	Existing	National Manager Operations	Managing Director National Manager Operations
POLHOUAUSNATDMO202202	February 2022	2.1	Scheduled review	Every two years	National Manager Operations	Managing Director National Manager Operations
POLHOUAUSNATDMO202102	December 2021	2.0	Minor update	Every two years	National Manager Operations	Managing Director National Manager Operations
POLHOUAUSNATDMO201801	December 2018	1.0	New policy	Every two years	National Manager Operations	Managing Director National Manager Operations