

Reasonable Adjustments Policy

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1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Overview

We will take proactive steps to ensure that our policies and services are inclusive and accessible to all. In line with the Public Sector Equality Duty, we will advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

We have a legal duty to ensure our customers are not prevented from using our services because they have a disability.

Under the Equality Act 2010, the duty to make reasonable adjustments falls into three areas:

- When changing a policy, procedure, or any standard practices
- Where a physical feature puts a customer with disabilities at a substantial disadvantage in comparison with customers who are not disabled
- Where a disabled person, without the provision of an additional aid or service, would be put at a substantial disadvantage in comparison with customers who are not disabled.

Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.

This policy does not cover every scenario as they are tailored and personal to the individual, but it is intended as general guide.

3. Aims and Objectives

This policy aims to ensure that:

- If you have a disability, you can access our services, as far as reasonably possible, in the same way customers without a disability can.
- Our colleagues understand our duty to make reasonable adjustments.
- Our colleagues understand the types of adjustments they can make when delivering services to a customer with a disability.
- We anticipate adjustments that customers with a disability **may** require but do not make assumptions and talk to you about your individual needs.
- Our priorities are to:
 - Commit to improving accessibility for all our customers.
 - Clearly explain what we consider when dealing with requests for reasonable adjustments.
 - Explain how you can appeal if you do not agree with our decision relating to your circumstances.

4. Scope of Policy and Exclusions

The policy applies to all our customers.

This policy does not directly cover reasonable adjustments that you may request to make your home more accessible; the addition of a ramp to a front door or fitting of a walk-in shower for example. We have separate processes in place for requesting aids and adaptations. Please see our website for more information. [Aids and adaptations - GreenSquareAccord](#)

Any specific arrangements you have in relation to Fire Safety (evacuation needs for example) are covered in our fire arrangements, although we will consider your needs in deciding if a property is suitable (for example, you may require ground floor accommodation because of mobility issues).

Customers who receive and access our care and support services will have a package of support tailored to their individual needs as documented within our care and support procedures. Other aspects of this policy will apply to customers across service types.

Reasonable adjustments for colleagues are covered by our People policies and procedures.

5. Roles, Responsibilities and Duties

The Executive have overall responsibility for ensuring we have frameworks in place to meet our legal and regulatory obligations and that they set a clear tone that is in line with our social purpose and commitment to being a great social landlord.

The Director of Customer Services and Director of Quality and Compliance have overall accountability for this policy and implementation.

All Directors and Heads of Service have responsibility for ensuring their teams are aware of the requirements in relation to reasonable adjustments and exercise these in practice.

All colleagues have a responsibility to follow the principles of this policy and work in a manner that demonstrates our commitment to inclusion and accessibility.

6. Impact Assessments and Key Considerations

- ◆ Customers (To include, for example, Equality, Diversity and Inclusion implications)

We will ensure that all our customers are able to access our services regardless of any disabilities. Fairness and accessibility are a key aim of this policy. It is designed to ensure we meet our obligations under the Equality Act and meet individual needs. All requests for reasonable adjustments from customers with a disability from any of the diversity strands will be actioned and responded to, with a tailored solution put into place as necessary.

An Equality Impact Assessment has been completed and indicates no negative impact on any group as a result of this policy.

- ◆ Communities

Meeting the needs of our communities is an important part of our strategy and responding to diverse needs is important in developing inclusive communities.

- ◆ Planet (To include, for example any digital or carbon neutrality implications)

No specific implications.

- ◆ Governance (To include, for example any VFM, UK GDPR, or Health & Safety / Risk implications)

Information relating to individual needs may constitute sensitive data and needs to be processed in line with our data protection policies and procedures.

Some customers may have needs that require additional support to manage health and safety- for example, a customer who is profoundly deaf may require alarms utilising strobe lights or vibration pads in the event of a fire.

◆ Partners

Our partners include other people we work with such as voluntary and statutory agencies. Our partners need to have trust and confidence that we will comply with our legal and regulatory frameworks and treat our customers in a way that best meets their individual needs.

◆ People (To include, for example, any HR or Equality and Fairness implications)

It is important that our colleagues understand our duty to make reasonable adjustments and are provided with the support, training and resources to make appropriate decisions in relation to reasonable adjustments.

7. Definitions

Under the Equality Act 2010 (The Act) a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to carry out normal day-to-day activities. This includes needs relating to neurodiversity.

A **reasonable adjustment** involves making a change to the way we usually do things to make sure our services are accessible, and we are fair to all our customers. These adjustments may come in a variety of forms such as a physical alteration to our offices changes to our policies, procedures or the way services are operated, or adjusting how we communicate with customers to meet their specific needs.

Reasonable adjustments are changes to practices, either on a temporary or permanent basis, which aim to avoid disadvantaging someone who has a disability and to provide extra support where necessary.

8. Our Policy

We are committed to ensuring no one is disadvantaged due to a disability when accessing our services, this also applies to mental health conditions and needs relating to neurodiversity. While this is addressed through individual policies, this policy is an umbrella policy setting out our commitment to making reasonable adjustments.

8.1 How to request a reasonable adjustment

A reasonable adjustment can be requested from us in the following ways:

- In writing; by letter or email.
- By telephoning our Customer Contact Centre.
- Through a request made to one of our colleagues, including speaking to a Housing Officer, Surveyor or Healthy Homes Advisor.
- By referral from a local authority or other relevant agency.

- By a family member or third party when we have been given permission for them to do so or an appropriate power of attorney is in place.

8.2 Examples of reasonable adjustments

There is no prescribed list of reasonable adjustments; the adjustment will depend on your individual needs. We will discuss any requirements with you and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether you need an adjustment or about what those adjustments should be but will use our knowledge of your needs to talk to you about how we can support you. No additional costs will be made to customers in relation to reasonable adjustments made.

Examples of reasonable adjustments could be:

- Providing information in alternative formats, for example in large print or Braille, as an audio file, or on coloured paper.
- Giving more time to do something if this is allowed by law. For example, we can be flexible with timescales we have set ourselves, such as asking you to contact us within a certain amount of time to make a request or respond to something, but we can't change timescales set out in legislation, such as, if you ask for a review after receiving a notice of seeking possession.
- Adapting our communication method, for example if email or phone is preferred to hard copy letter.
- Providing a sign language interpreter for d/Deaf customers who use British Sign Language (BSL) if it is necessary to communicate face to face.
- Taking extra time and adapting communication methods, such as using visual aids, where a customer has a learning disability.
- Providing information on the structure and timing of visits in advance.
- Allowing additional breaks during meetings or visits.
- Communication through a representative or third party (with appropriate consent).

8.3 Responding to requests for reasonable adjustments

In most cases we will be able to agree on delivering the reasonable adjustments with minimum delay. However, there may be some cases when the request needs to be looked at in more detail or may need to take further advice from specialist organisations.

When providing a specific adjustment, we'll discuss and confirm this with you or your representative to avoid making incorrect assumptions about your needs. We will keep you updated and informed about the progress of your reasonable adjustment. In cases where we can't meet your preferred adjustment, we'll work with you to find the best solution.

8.4 How do we decide what is reasonable?

We commit to consider all reasonable adjustments requests from customers. Although The Act does not specifically define what 'reasonable' means, the guidance suggests the relevant factors are:

- The **effectiveness** of the adjustment to prevent or reduce a person who feels disadvantaged due to their disability.
- The **practicality** of us making the adjustment.
- The **availability** of our resources.
- Any **disruption** to services because of the adjustment.

Effectiveness: We will need to consider the effectiveness of the adjustment and ensure it fully addresses the disadvantage it is meant to overcome.

Practicality: We will need to consider if we are practically able to provide the reasonable adjustment. For example, if you request additional time to read documents but there is a legislative deadline out of our control that means we cannot provide this time.

Resources: Even if an adjustment is effective, we may not be able to provide it because of our resources. This may not always be because of cost but could also involve the resources and skill of our colleagues. The reasonableness of an adjustment will be looked at against the resources we have available. There may be occasions where we can signpost customers to other agencies who may be able to assist.

Potential disruption to services: Like resources, we need to understand whether the adjustment will impact the effectiveness of our services. For example, it is not practical for one of our colleagues to be working solely on one customer's concerns as others who also need our help and support may be adversely impacted. While it may solve the issue for that one customer in a shorter timeframe, the resources it would take could be detrimental to the effectiveness of the services that we deliver to all customers. In this circumstance we could offer the customer extra time to have the issue or concern dealt with.

8.5 Appeal

If you are unhappy with any decision made by us in relation to reasonable adjustments, you can appeal that decision. In the first instance, any appeal will be considered by the relevant Director.

In any consideration of whether an adjustment may be effective, it is appropriate to consider the views of a specialist person/ organisation.

If you remain dissatisfied with how we have handled your request, you can use our complaints policy. Any complaint process will look at how we handled your request and whether we did do fairly in line with this policy.

8.6 Keeping a record of needs

At the beginning of your contractual relationship with us you will be asked whether you have any specific needs and/or any communication preferences. This includes needs relating to disability.

These will be recorded onto our internal systems and will be used to meet specific needs throughout the duration of our service.

We will proactively check that we have the appropriate support flags and communication preferences recorded on our systems, where information is missing or requires updating. If your needs change and you would like to tell us, then please contact us at any time.

We will follow the 3R's – recognise, respond and record vulnerabilities.

8.7 Reasonable adjustments in complaints management

We will make reasonable adjustments to our complaints service where necessary to ensuring customers with a disability are not at a disadvantage when accessing the service.

Examples of the reasonable adjustments we will make are:

- Using communication preferences throughout the duration of the complaint
- Offering face to face visits to understand your complaint
- Extension of any time limits (where it is lawful to do so); and
- Provide information in alternative formats; Braille, large print or on coloured paper, for example.
- Meeting you in locations appropriate to your needs; availability of a hearing loop for example.
- Take account of known conditions when following our procedures. For example, it may not be appropriate to use the unacceptable behaviour for a customer with a cognitive impairment (such as learning disability or dementia).

8.8 Reasonable adjustments in customer engagement

When engaging with you we will take steps to ensure no-one is excluded from customer engagement opportunities.

We will take steps to maximise access to engagement activities. We will also make provision for customers to provide their input and feedback in an alternative way, such as over the telephone or via email if they prefer or it better meets their needs.

8.9 Accessibility of our website

We want as many people as possible to be able to use our website.

Please refer to our Accessibility Statement on the website that details how we optimise the accessibility of our website [Accessibility statement - GreenSquareAccord](#)

9. Monitoring and Reporting

◆ Data Recording

We will record and monitor any reasonable adjustment requests. Internally, we will monitor these adjustments through our recording systems to ensure information is up-to-date and we are appropriately responding to identified needs.

It is the responsibility of the colleague who is receiving the request for a reasonable adjustment to record the details on our systems and to ensure there is a recorded review date. Our colleagues will be able to identify a reasonable adjustment through a flag on the system. This makes them aware of the reasonable adjustment in place and informs them of how they can support you.

How we will monitor requests and outcomes will be subject to further discussion and review with colleagues.

◆ Monitoring Effectiveness

We will monitor the effectiveness of this policy through customer feedback (including complaints) and satisfaction surveys as measures of how we are doing.

◆ Reporting

Our annual self-assessment against the Housing Ombudsman Code will be used to review that we are making adjustments as necessary. This will also be monitored through our reporting on equality and diversity.

10. Quality Assurance

Compliance with this policy will be validated through internal audit checks and monitoring of customer complaints and feedback.

11. Communication, Training and Implementation

We will let customers know we can provide reasonable adjustments in the following ways:

- By publishing details on our website
- By working with the Customer Panel and others to raise awareness of this policy
- As part of sign-up/ welcome packs
- Using events such as customer roadshows

All our colleagues receive mandatory training in relation to Equality and Diversity. For relevant colleagues we will ensure reasonable adjustments are covered in associated training (such as complaints handling or customer care).

12. Legal and regulatory framework

Equality Act 2010

Under the Equality Act 2010 (The Act) a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to carry out normal day-to-day activities.

The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

The duty is 'anticipatory' to disabled people in general as well as to individuals, so we must think in advance and anticipate what people with a disability might reasonably need.

This policy has been written in accordance with the Housing Ombudsman Service's Complaints Handling Code and our commitments under the The Act.

The Regulator of Social Housing's Tenant Involvement and Empowerment Standard, requires us to "provide choices, information and communication that is appropriate to the diverse needs of (our) tenants" and to "demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs." The proposed new consumer standards (that are planned to replace the current standard) includes requirements to take action to deliver fair access to, and equitable outcomes of, housing and landlord services for all tenants.

13. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- ◆ manage and support our relationship with you to comply with legal obligations-
- ◆ improve our services-
- ◆ achieve our legitimate business aims-

We are committed to complying with data protection legislation when handling your data.

You have rights including access to your data and to object to the way it is processed. For more information on how and why we process your data and how you can exercise your rights please view our full Privacy Policy on our website at Privacy notice – GreenSquareAccord.