

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. Introduction

We have a legal duty to ensure our customers are not prevented from using our services because they have a disability and will take proactive steps to ensure that our policies and services are inclusive and accessible to all.

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'. Some practical examples of this, are:

- A Deaf customer who uses BSL cannot participate fully in a meeting because no interpreter is provided.
- Someone with dyslexia struggles to complete long written forms in the usual timescale and therefore cannot access a service effectively
- A person with limited mobility cannot attend appointments because the interview room is on an upper floor and there is no lift.

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

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.

This policy is also aligned to the commitments made as part of the GSA Way, including valuing differences, putting you first and knowing what matters. It reflects principles of identifying and meeting individual customer needs, as set out in our Customer Strategy and Vulnerability Strategy.

3. Scope of Policy and Exclusions

The policy applies to all our customers.

This policy does not directly cover 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. This is because we have separate processes in place for requesting aids and adaptations [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).

Reasonable adjustments for colleagues are covered by our People processes.

4. Definitions

<i>Reasonable Adjustment</i>	<p>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.</p> <p>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.</p> <p>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.</p>
<i>Equality Act 2010</i>	<p>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.</p>

5. Roles and Responsibilities

The **Executive Board** 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 Experience** 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 take personal accountability for their own approach.

6. Policy

We are committed to ensuring nobody 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.
- Through a request made to one of our colleagues.
- 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 set list of reasonable adjustments; the adjustment will depend on your individual needs. We will discuss any requirements with you and talk to you about how we can support you.

Examples of reasonable adjustments could be:

- Providing information in alternative formats, for example in large print or Braille, or as an audio file
- 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.
- Agreeing how and when we communicate with you, for example if email or phone is preferred to hard copy letter.
- Providing a sign language interpreter for Deaf customers who use British Sign Language (BSL) if it is necessary to communicate face to face.
- 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 such as your authority, or through evidence that Power of Attorney is in place).

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. 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 Equality Act 2010 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 addresses the disadvantage you face.

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 and we will look at potential solutions wherever feasible. Where we are unable to provide an adjustment on this basis, we will look at other options, such as referral to other support agencies.

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 negatively impacted.

8.5 Appeal

If you are unhappy with any decision made by us in relation to reasonable adjustments, you can appeal within 28 days of receiving the decision. If you appeal a decision, please include any additional information you want us to consider. We will not consider appeal requests or additional evidence after 28 days unless there are any mitigating factors which will consider on a case-by-case basis.

Any appeal will be considered by a person more senior than the person who made the decision and an outcome will be provided with 14 days.

In any circumstance that we need to extend this (such as to gain specialist reports or advise), we will let you know this and our expected time to provide a response.

If you are dissatisfied with how we have handled your request (rather than the decision itself), 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. Our complaint policy timescales will apply.

8.6 Keeping a record of needs

At the beginning of your relationship with us, we will ask you whether you have any specific needs and/or any communication preferences and these will be recorded on our systems.

Through our contact with you, we aim to check that we have the correct information recorded on our systems, or whether information requires updating.

If your needs change and you would like to tell us, then please contact us at any time via any of our contact channels.

Where we appoint Contractors to act on our behalf, we will share information necessary to meet your needs.

8.7 Data Recording

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

We are currently reviewing how we can make improvements to how we record this information, so it is recorded in a consistent way and is visible to all colleagues who need to know that an adjustment is in place.

We will monitor improvements in these areas through our Customer Data group, ensuring we establish a clear timeline, and associated training, as part of improved data recording.

7. Reporting and Monitoring

Performance Measures

We will use the annual Tenant Satisfaction Measures to help assess how well we are delivering services to meet individual needs.

In particular: TP08: *“Proportion of respondents who report that they agree their landlord treats them fairly and with respect”*

As we complete improvement work in how we standardise reasonable adjustment requests and responses on our recording systems, we will add additional KPIs such as:

- Number of adjustment requests received and fulfilled
- Time taken to respond to requests

Monitoring Effectiveness

We will monitor the effectiveness of this policy through customer feedback (including complaints) and customer satisfaction surveys.

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 wider reporting on our customer profile, where we use information about customer needs to help us shape future services.

8. Assurance

GreenSquareAccord has a risk management framework in place and failure to deliver this policy would impact on several principal risks.

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

- First Line Assurance -operational managers are responsible for checking that colleagues are working in line with our policies and procedures.
- Second Line Assurance – as part of internal quality checks, other internal teams may complete independent reviews that internal processes are being followed
- Third Line Assurance – external reviews (such as by regulators or Ombudsman services) will also consider how well we are tailoring our services to individual needs.

9. Equality Impact Considerations

We will ensure that all our customers are able to access our services regardless of any disabilities or neurodiversity

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 Protected Characteristics will be actioned and responded to, with a tailored solution put into place as necessary.

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

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

This policy will be applied to ensure that all our customers have a fair and equal access to our services, and it does not discriminate against any protected group.

10. Data Protection Considerations

Information relating to individual needs will be processed in line with our data protection policies and procedures. This includes requirements around how we process special category data.

11. Training and Competency

All relevant colleagues are required to complete e-learning (or equivalent face to face sessions) on meeting the needs of customers who may have additional needs or vulnerabilities. This includes a section on reasonable adjustments, including the legal framework and the process for considering reasonable adjustments. This training includes case study examples to assist colleagues in delivering reasonable adjustments and is refreshed on a three-year basis.

Wider Equality and Diversity training is mandatory for all colleagues in GSA.

12. Communication and Implementation

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

- By publishing details on our website [Reasonable adjustments | GreenSquareAccord](#)
- By working with the Customer Panel and others to raise awareness of this policy
- As part of any contact with customers where a need or vulnerability is highlighted as an area where an adjustment may be required.

13. Legal and Regulatory Framework

This policy has been written in line with our legal and regulatory obligations under the Equality Act 2010, the Housing Ombudsman Service's Complaints Handling Code and the Regulator of Social Housing Consumer Standards Transparency, Influence and Accountability Standards.

For health and social care services, it aligns with requirements in the NHS Accessible Information Standards (see separate procedure).

14. 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 customers to comply with legal obligations
- improve our services
- achieve our legitimate business aims

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

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).