

# Reasonable Adjustments Policy



## 1. Purpose

- 1.1 This policy has been written in accordance with the Housing Ombudsman Service's Complaints Handling Code and our commitments under the Equality Act 2010.

## 2. Policy Statement

- 2.1 Saffron Housing Group are committed to making sure its services can be easily accessed by customers with disabilities and/or additional needs.
- 2.2 This policy does not aim to explain how we will approach every circumstance where a customer with disabilities requires a service to be adjusted. It is a general statement of our commitment to ensure customer with disabilities are not at a disadvantage when accessing our services.
- 2.3 The policy defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.
- 2.4 The policy applies to all Saffron Housing Group customers.
- 2.5 Any reference to 'The Group', 'we', 'our' or 'us' refers to Saffron Housing Group.

## 3. The Equality Act 2010

- 3.1 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. Saffron will recognise all protected characteristics and this extends to neurodivergent customers.
- 3.2 The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.
- 3.3 Under the Act, we have a legal duty to make reasonable adjustments in the following three circumstances:
- Where there is a provision, criterion or practice which puts a person with a disability at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled.
  - Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons who are not disabled; and or
  - Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.
  - Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.

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## 4. What is a reasonable adjustment?

4.1 To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability.

Examples of this include:

- Making an alteration to one of our premises, for example, fitting a ramp or wide doors.
- Providing information in alternative format or a sign language interpreter.
- Allowing more time than we would usually, for someone to provide information that we need
- Clear simple and possible repeated explanations of what's happening or can be expected

## 5. Types of reasonable adjustment we can offer

5.1 There is no prescribed list of reasonable adjustments, the adjustment will depend on the individual's needs. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances.

Some examples of the adjustments that we can make include:

- provision of auxiliary aids
- provision of information in appropriate alternative formats (e.g. large print, Braille, coloured paper etc)
- use of email or telephone in preference to hard copy letters
- Use of plain English
- communication through a representative or intermediary
- rest or comfort breaks in meetings.
- Arranging to read written communications to tenants over the phone or where appropriate face to face.

5.2 In all circumstances, the reasonable adjustment is being made to ensure all of our services can be equally accessed by our tenants and residents with disabilities, as well as those who do not.

## 6. How to request a reasonable adjustment

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

- By telephoning our Customer Contact Team
- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email
- By referral from the local authority or another relevant agency
- By a family member when we have been given permission for them to do so or
- A member of staff may suggest for one to be made, when they are aware it will support the customer's needs.

6.2 In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail

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how best to overcome the difficulty a customer with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support.

## 7. How do we decide what is reasonable?

7.1 The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission Suggest that the most relevant factors are:

- How effective the adjustment(s) will be in assisting a customer with a disability and in preventing or reducing the possibility of them being at a disadvantage it is meant to overcome.
- The practicality of the Group making the adjustment(s) – for example, it may not be necessary or
- The cost of the adjustment(s) and whether this is possible within Group resources and Any disruption to the service that making the adjustment(s) may cause.

### *Effectiveness*

The adjustment should be designed to fully address the disadvantage it is meant to overcome. For example, providing an audio version of documents may not properly overcome the barriers faced by the disabled person if there are other requirements that need to be overcome, for example the customer also has a hearing impairment.

### *Practicality*

For example it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet.

### *Resources*

For an adjustment to be reasonable, it should be effective. However, it is important to remember that is an adjustment which is deemed effective, may not be considered reasonable. For example resourcing is not just about the cost, but it may involve other factors for example recruiting additional staff with specific skills. If an adjustment costs a significant amount, it is more likely to be reasonable to make the adjustment if the organisation has substantial financial resources.

### *Reasonableness*

The reasonableness of an adjustment will be evaluated against the resource available to our Service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

it would not usually be reasonable for a staff member or team to cease work on all other cases and devote all of their time to one person as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

In changing policies, criteria or practices we are not required to change the basic nature of the service we offer.

7.2 In the circumstance where we are unable to make a reasonable adjustment due to cost or

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Resource limitations, we will work together with the customer to find the most appropriate alternative solution for them.

## 8. Keeping record of a customer's needs

8.1 These will be recorded onto our internal systems and will be used in order to meet the customer's specific needs throughout the duration of their tenancy.

8.2 Reasonable adjustment requirements will be recorded consistently on our customer database. The information will be stored securely and all relevant Saffron officers will have access to the information when supporting any customer.

8.3 All Staff will be aware of where reasonable adjustments are recorded and be responsible for reviewing the information when opening a customer's account.

## 9. Reasonable adjustments to our complaints process

9.1 We will make reasonable adjustments to our complaints service where necessary, and make complainants aware that adjustments can be made, ensuring customers with a disability are not at a disadvantage when accessing the service. Examples of the reasonable adjustments we will make are:

- Using the customer's communication preference throughout the duration of the complaint
- Provide information in alternative formats e.g. Braille, large print or on coloured paper.
- Communication through a permitted representative or intermediary.

9.2 In changing policies, criteria or practices we are not required to change the basic principles of the Complaints Policy or Procedure.

For example, it would not usually be reasonable for a staff member to cease work on all other matters and devote all of their time to one person as other residents will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

## 10. Website

10.1 We subscribe to Browsealoud, which is a function on our website and works across all common browsers and platforms. Browsealoud has many features to help improve accessibility for our tenants and residents, including:

- An audio feature, which reads text aloud
- Options to change the audio speed and voice to suit the customer; and
- A simplify mode, which removes distracting content.
- Text size changing

## 11. Appeals

11.1 If a customer is dissatisfied with the arrangements or decisions, we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.

11.2 If necessary when reviewing our decision, we will seek advice from specific expert disability groups.

## 12. Monitoring

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12.1 We will record and monitor the reasonable adjustments that have been requested and made, this will allow us to review the services we provide and help us identify whether there are any wider steps that we can take to improve our services.

## 13. Related Policies

- Equality, Diversity & Inclusion Policy
- Services for Older People and or those with Disabilities Policy
- Access to Housing Policy
- Aids and Adaptations Policy
- Anti-Social Behaviour and Hate Crime Policy
- Complaints and Compliments Policy
- Unacceptable Behaviour Policy

## Policy Reviews

This policy will be reviewed every two years.

<b>Tenant Consultation</b>	March 2024
<b>Committee</b>	Service Quality Committee
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