



Policy: Reasonable Adjustments
Approved by: Leadership Group

Date XX July 2024
Approved:

Frequency of review: Every 3 years

POLICY STATEMENT:

Broadland is committed to ensuring that our services can be accessed by our residents with disabilities or additional support needs.

A reasonable adjustment is a change to a service which seeks as far as possible to remove any disadvantage faced by those with a protected characteristic or a vulnerability.

Many of the adjustments we offer to our services are also available to residents without disabilities and we recognise that the word vulnerable/vulnerability is an imperfect term.

We are committed to meeting our responsibilities and duties under the Equality Act 2010.

This policy has been developed to ensure Broadland complies with current legislation, regulatory expectations, and good practice, and will be subject to ongoing review.

Policies apply to all legal entities within Broadland unless stated otherwise.

SCOPE:

This policy applies to all Broadland residents and prospective residents.

This policy does not aim to explain how we will approach every circumstance where a resident requires a service to be adjusted. It is a general statement of our commitment to ensure residents are not at a disadvantage when accessing our services.

This policy has been written in accordance with the Housing Ombudsman's Service, Complaint Handling Code, our commitments in the Equality Act 2010 and the Regulator of Social Housing's Transparency, Influence and Accountability Standard.

Broadland's Reasonable Adjustment Procedure gives a detailed account of how this Policy will be implemented.

KEY STAFF RESPONSIBILITIES:**Senior management**

Senior Managers are responsible for ensuring that policies and procedures are followed. They are responsible for monitoring the services they manage and highlighting any challenges in implementing this policy. Senior Managers are role models for promoting policies to their teams and improving services through resident and staff feedback.

Neighbourhood Officers

Neighbourhood Officers are responsible for asking residents about reasonable adjustments during the allocations process.

Scheme Managers

Scheme Managers provide low level support to resident living in sheltered housing and will have regular conversations with residents about any reasonable adjustments they may need.

Staff

Staff are responsible for ensuring they are fully aware and adhere to the terms set out in the policy.

DEFINITIONS:

Broadland – Broadland Housing Association

Disability - 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.

- **Substantial** – The definition of disability in the Equality Act defines substantial as more than minor or trivial, eg it takes much longer than it usually would to complete a daily task like getting dressed
- **Long Term** - means 12 months or more, eg a breathing condition that develops as a result of a lung infection

EqIA – Equality Impact Assessment

Reasonable Adjustment – Is a change to the way we usually do things to take account of residents needs.

General needs housing - Housing without support provided either as part of the tenancy agreement or paid for via service charges.

Protected Characteristics- These are elements of a person’s characteristics that are protected from discrimination under the Equality Act 2010.

RELVANT KEY LEGISLATION AND RELATED DOCUMENTS: (not limited to)**Legislation**

Equality Act 2010
RSH Transparency, Influence and
Accountability Standard

Documents

Tenancy Agreement
EDI Policy
EDI Customer Procedure
Allocations Policy & Procedures
ASB Policy & Procedures

<p>Housing Ombudsman Complaint Handling Code & Spotlight Reports Public Sector Equality Duty Modern Slavery Act 2015</p>	<p>Complaints Policy & Procedure Unreasonable Complaints Policy & Procedure Income Policy & Procedures Aids & Adaptations Policy & Procedures Safeguarding Policy & Procedures Domestic Abuse Policy & Procedures Self Neglect & Hoarding Policy & Procedures Repairs Policy Customer Charter Equality Impact Assessment NHF Knowing our homes – initial proposals on key resident information.</p>
--	---

EQUALITY IMPACT ASSESSMENT:

This policy has had a full Equality Impact Assessment.

DATA PROTECTION

This policy (and associated procedures) requires a Privacy Impact Assessment (PIA) and one was completed on 28 May 2024 and appropriate risk mitigations implemented.

Please refer to the Tenant and Employee Privacy Notices, and the Data Protection Policy and Procedures, for details on Broadland’s use, security, sharing and retention of personal data.

Broadland Housing Association will only share personal data in accordance with the requirements of the GDPR/ Data Protection Act 2018. We will abide by the laws and regulations in relation to the right to confidentiality, data sharing and disclosure rules in the Act and in relation to any Civil and/or Criminal disclosure legal requirements. _

Broadland Housing Association will inform individuals of the identity of other parties to whom we may disclose, or to whom we may be required to provide, personal data; the circumstances in which this may happen, and when any exceptions to this rule may apply.

Please refer to the Data Protection Policy. This will inform you about BHA’s approach to securing your data, the appropriate use of data, how long we store and retain your data, and your rights regarding your data.

IMPORTANT PRINCIPLES:

- Our process follows the Recognise, Respond and Record approach.

- We will ask residents about any reasonable adjustments for their household when we meet them during the allocations process.
- We will carry out a full Equality Impact Assessment on all policies which cover services to residents.
- As part of our commitment to Equality, Diversity and Inclusion, all staff receive training aimed at promoting diversity and addressing barriers that individuals from protected groups including disability residents may face when accessing our services.
- We encourage residents to contact us and tell us about any changes in their circumstances to allow us to discuss reasonable adjustments with them.
- We recognise general needs housing does not mean no needs and residents can live independently and be vulnerable.
- We recognise vulnerabilities are not static and can depend on circumstances.
- We will consider vulnerability based on individuals circumstances and not through the Safeguarding lens.
- Reasonable adjustments may involve partnership working with other agencies who are qualified to provide additional support.
- Reasonable adjustment requirements will be shared with repairs contractors who do work on our behalf as we expect them to provide the same level of service when working in residents homes.
- Some of our policies may have reasonable adjustments specified in them, such as the Complaints Policy.
- If a resident is unhappy with a decision about a reasonable adjustment, they can appeal it through our complaints process.