



Procedure: Reasonable Adjustments

Approved by: Leadership Group

Date Approved: July 2024

Frequency of review: Every 3 years

1. PURPOSE

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 vulnerability is an imperfect term.

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 Tenant Involvement & Empowerment Standard.

2. 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.

3. 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

EIA – Equality Impact Assessment

General Needs Housing – Housing without support provided either as part of the tenancy agreement or paid for via service charges.

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

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

4. RELATED DOCUMENTS

RELVANT KEY LEGISLATION AND RELATED DOCUMENTS: (not limited to)	
Legislation	Documents
Equality Act 2010 RSH Transparency, Influence and Accountability Standard Housing Ombudsman Complaint Handling Code & Spotlight Reports Public Sector Equality Duty Modern Slavery Act 2015	Tenancy Agreement EDI Policy EDI Resident Procedure Allocations Policy & Procedures ASB Policy & Procedures 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 Resident Charter Equality Impact Assessment NHF Knowing our homes – initial proposals on key resident information.

5. OVERVIEW

Procedure Owner: Louise Archer

Revised by: Stephani Davis

Verified by: Leadership Group

The 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. Under the Act, we have a legal duty to make 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.
- 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.

What is a reasonable adjustment?

A reasonable adjustment is a change to the way we usually do things to take account of a resident's individual needs. This could be a physical alteration to one of our homes or premises, for example, fitting a lift, wide doors, or a ramp, it could be a change to one of our policies, procedures or services or a change in how we communicate with someone.

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

Types of reasonable adjustment we can offer:

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.

We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

Some examples of the adjustments that we can make include:

- Information in appropriate alternative formats (e.g. large print, Braille, coloured paper, translated into another language etc.)
- Use of email or telephone in preference to hard copy letters.
- Use of plain English or Easy Read service.
- Communication through an advocate.
- Speaking clearly to our residents with the offer of additional time to cover the issues they need to discuss.
- Providing an interpreter (including sign language) when appropriate
- Arranging home visits for those who have particular mobility difficulties.

- Providing services or appointment times to take account of medical needs or special circumstances such as caring responsibilities.
- Adaptations to a resident's home such as grab rails, ramps or fitting a stair lift. Please note that these adaptations are subject to residents applying via the Aids & Adaptations process.
- Providing assistance with travel to a stage 2 complaint meeting and or holding the meeting nearer the residents home.

Promoting reasonable adjustments.

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

- Asking whether a reasonable adjustment might be required when we let a home.
- Publishing our policy on our website
- Including a note on our published documents and letters indicating that we can provide a documents in an alternative format on request
- Identify where reasonable adjustments may be required when we are delivering services to you or carrying out home visits.

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

- By telephone or in writing, explaining what the adjustment is and why it is needed. In writing includes letter, e mail, via the website or using Tenants Online.
- By referral from a local authority or other relevant agency
- By a family member when we have been given permission for them to do so.
- A member of staff may suggest for one to be made, when they are aware it will support the resident's needs.

In most cases for example adjustments around communication needs can be put in place upon request. However, in some cases it may be necessary for us to consider in more detail how best to overcome the difficulty a resident with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support. This includes scenarios such as adaptations and the use of advocates and whilst we cannot commit to a timescale in these scenarios, we will prioritise keeping the resident updated on progress.

Deciding what is reasonable:

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:

- The effectiveness of the adjustment(s) in preventing or reducing disadvantage for the disabled person.
- The practicality of us making the adjustments.

- The availability of resources including external assistance and finance.
- Any disruption to the service that making the adjustment 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 resident also has a hearing impairment.

Practicality - For example it may not be possible for to do the requested aids & adaptations in a residents home if there isn't the space to do so or the structure of the building won't allow it.

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 may not be reasonable to make the adjustment if the organisation does not have the money to do so.

Disruption to services – For example, it would not usually be reasonable for a member of staff to devote all of their time or a disproportionate amount of time to one person or case as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

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

In the unlikely event that a reasonable adjustment is not able to be made, we will work with the resident to find the most appropriate alternative solution. If a member of staff needs support in reaching a decision about a reasonable adjustment, they will seek guidance from their line manager.

Appendix 1 is a flowchart of the process to support staff in implementing it.

Appendix 2 provides guidance for staff on how to record a Reasonable Adjustment on BBS.

Keeping a record of residents needs

- At the beginning of a tenancy, residents will be asked whether they have any support needs and/or any communication preferences.
- These will be recorded on our system and will be used in order to meet the residents specific needs throughout the duration of their tenancy.
- We will use appropriate flags on our system to record this information and make sure its visible to any staff providing the resident with a service.
- We rely on residents to tell us when their needs change to help us provide the right service for their needs.

- We will carry out an annual review of reasonable adjustments and contact residents to check its still relevant.
- We will monitor the number of reasonable adjustments and we aim to use this data to improve how we deliver services.

6. REVIEW

This procedure will be subject to ongoing review, reasons for a review may include but are not limited to:

- Feedback from residents and staff using the policy
- Learning from complaints
- Changes in Legislation
- Changes in associated policies or procedures

Any review would be subject to further resident consultation including the Tenant Assurance Panel.