

Reasonable Adjustments for Tenants and Customers Policy

Department	<i>Housing</i>
Policy Owner	<i>Housing Managing Directors</i>
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Approving Body	<i>Customer Committee – date TBC</i>
Associated Legislation/Regulation	<i>02/05/2024</i>
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Purpose

This policy helps all employees and tenants understand the legal duty placed on Flagship Group to make reasonable adjustments available to disabled tenants, and other situations where a reasonable adjustment may be required to meet a tenants need which may not be covered by the Equality Act 2010. It demonstrates our commitment to delivering outstanding customer service and applies to anyone that lives within a Flagship Group Home.

Equality Act 2010

The Equality Act 2010 protects people from discrimination and replaces previous anti-discrimination laws with a single Act. As a social housing provider, we have a responsibility to eliminate discrimination, ensure equality of opportunity and promote good relations between people that have protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) and those who do not.

Under the Equality Act 2010, the legal duty to make reasonable adjustments arises in three circumstances:

- Where there is a provision, criterion or practice which puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled.
- Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.

This means that where reasonably practicable, a tenant is entitled to ask for reasonable adjustments and/or auxiliary aids (temporary adaptations or portable support aids) to allow them to enjoy their home. However, this does not provide the tenant with the right to remove or change the physical features of their home, but they are still able to enquire if it is possible.

In addition to our legal responsibility, we are also committed to ensuring a high standard of accessibility and experience to all of our customers. Where possible, we extend our approach to reasonable adjustments to other groups alongside disabled groups, and offer a change of service to those that have individual needs

What is a reasonable adjustment?

‘Reasonable adjustment’ is a legal term introduced under the Equality Act 2010 referring to Flagships legal duty to make adjustments to services, homes and/or physical premises to avoid placing a disabled person at a substantial disadvantage. An adjustment can only be determined as reasonable in relation to the individual’s circumstances, and an adjustment which is reasonable for one individual, may not be considered reasonable for another that has a different set of circumstances. As recommended by the Equality Act’s code of practice, we will be using the below to decide if an adjustment is considered reasonable:

- **Effectiveness:** how well does the adjustment in question remove or at least minimise the disadvantage?

- **Practicability:** how practical is the adjustment? For instance, is the property suited to the proposed works, how long will the work take, are all business areas able to offer the requested change to service etc?
- **Costs:** how much will the adjustment cost to implement? Is the works considered a minor or major adaptation, or a change to how we offer service?
- **Disruptions:** how disruptive to all business areas and the needs of the organisation would it be to meet the requested changes to service?
- **Resources:** any adjustment would need to be proportionate, and take into account Flagships size, funding, function and spending on other adjustments.
- **Assistance:** For example, grants commonly known as Disabled Facilities Grants may be available for housing adaptations or auxiliary aids.

Whilst it is not possible to provide an exhaustive list of all reasonable adjustments we could potentially offer, the below are examples of some we have previously implemented:

- Providing physical aids or adaptations to a home such as a grab rail, ramp, chair lift etc.
- Supporting an individual to find a more suitable home if necessary
- Providing information in alternative formats (e.g large print, braille etc.)
- Extending time limits where possible for time sensitive processes.
- Communicating with an appointed advocate.

Adjustments not covered by the Equality Act 2010

In addition to our legal responsibility, we are also committed to ensuring a high standard of accessibility and experience for all. Where possible, we extend our approach to reasonable adjustments to other groups alongside disabled individuals and offer a change of service to those that have individual needs. Some examples of adjustments we may make which are not covered by the Equality Act 2010 are as follows:

- Providing information in different languages or translation and interpreting services for those whose first language is not English.
- Providing additional support and communication adjustments for those with literacy challenges e.g easy read format documents.
- Providing additional support to carers and advocates of disabled individuals.
- Avoiding school drop off and collection times where possible for calls/ appointments.

Process

All reasonable adjustment requests Flagship receives will be considered using the below process:

- If a reasonable adjustment is requested, we will respond to the request in line with our service standards which can be found on housing association websites.
- We will assess whether the request can be met and will communicate our decision.
- If the adjustment requires an aid or adaptation to the property, the individual will be supported by the relevant team or signposted to the relevant local authority.
- An appeal can be made if we refuse to accommodate the reasonable adjustment, and this should be done within 14 days of our decision. Appeals can be in writing (including email) or over the phone. Relevant and supporting information will need to be provided by this time. When we notify you of our decision, we will provide you details of how to appeal and relevant contact information.

Training Statement

Employees within relevant business areas will be assigned e-learning on how to meet individual needs depending on the systems they use. Line managers within relevant areas of the business will receive additional training to support their teams.

Equality impact assessment statement

An Equality Impact Assessment was undertaken for this policy on 02/05/2024 and all identified impacts have been mitigated.

Measuring Effectiveness

The following will be considered to measure effectiveness:

- Appeals related to reasonable adjustments
- Data which supports that we are meeting our tenants' needs e.g INTRAN usage data.
- Customer satisfaction measures and feedback.

Review period

This policy will be reviewed as necessary, and at least every three years, by the Heads of Housing, and the Equity, Diversity and Inclusion Manager. It will be reviewed by the customer committee as appropriate.

Linked Documents

Equity Diversity and Inclusion Policy

Safeguarding Adults Policy

Safeguarding Children Policy

Reasonable Adjustment Guidance

Aids and Adaptations Guidance

Communication Adjustment Guidance

Disability, Neurodivergent Condition and Long-Term Illness Guidance

Accessibility Standard