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# Reasonable Adjustments Policy

<b>Title</b>	<b>Reasonable Adjustments Policy</b>
<b>Date Created</b>	<b>November 2024</b>
<b>Next Review Date</b>	<b>November 2027</b>
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<b>Approver</b>	<b>Board of Management</b>
<b>Applies to</b>	<b>General Needs social tenanted including clients' residents</b>

## 1 Introduction

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- 1.1 This policy outlines our approach to making reasonable adjustments to our services for disabled customers. CDS is committed to making sure that disabled people and those with health conditions are not disadvantaged when accessing our services.
- 1.2 This policy does not seek to explain how we will approach every situation. It is intended as a general statement of our policy and our commitment to ensure customers with disabilities are not disadvantaged when accessing our services, and the factors that we will consider when evaluating requests.
- 1.3 This policy aligns to the Housing Ombudsman Service Complaint Handling Code and our commitment under the Equality Act 2010.
- 1.4 This policy does not cover property aids and adaptations. Contact us for our policy on Aids & Adaptations.

## 2 Aims and Objectives

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- 2.1 This policy defines what a 'reasonable adjustment' is, how a request for a reasonable adjustment can be made and in what type of circumstances they will be carried out.
- 2.2 The policy aims to ensure our staff understand our duty to make reasonable adjustments, and the types of adjustments they can make when delivering services to disabled customers.
- 2.4 This policy applies to all CDS residents, including residents of the client coops to which we provide services.

## 3 The Equality Act 2010

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- 3.1 Under the Equality Act 2010, 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.

- 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.

#### **4 What is a reasonable adjustment?**

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- 4.1 A reasonable adjustment involves making a change to the way that we usually do things to remove or reduce the effect of a person's disability. It is important that we make reasonable adjustments to ensure that we are fair to everyone and that everyone has equal access to our services and enjoyment of their homes.
- 4.2 A reasonable adjustment could come in a variety of forms such as a physical alteration to a premises, a change in working practices such as policies, procedures or ways services are operated, or adjusting how we communicate with customers to meet their specific needs.
- 4.3 Examples of this include:
- Allowing more time than usual for someone to provide information that is needed; or
  - Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event.
- 4.4 When carrying out our role as a landlord we will always consider beforehand what we can do to make sure disabled residents are not disadvantaged.

#### **5 How we decide if an adjustment is reasonable**

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- 5.1 When considering whether an adjustment is reasonable, we will consider:
- The effectiveness of the adjustment in preventing or reducing the disadvantage for the disabled person. The adjustment should be designed to address the disadvantage as far as possible.
  - The practicality of us making the adjustment
  - The availability of our resources including external assistance and finance
  - Any disruption to the service that making the adjustment may cause.

## **6 Types of reasonable adjustment we can offer**

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6.1 There is no prescribed list of reasonable adjustments. The adjustments we can provide will depend on the individual's needs. We will discuss and confirm the requirements with the person concerned or their representative to avoid making incorrect assumptions about a person's needs and seek to reach agreement on what may be reasonable in the circumstances.

6.2 What is unreasonable in one situation might be reasonable for someone else. In cases where we can't meet a customer's preferred adjustment, we'll work with them to find the best solution.

6.3 Some examples of adjustments we can make include:

- providing information in alternative formats (for example, in large print or Braille, as an audio file, or on coloured paper)
- extension of time limits (where it is lawful to do so)
- use of email or telephone in preference to hard copy letters
- communication through a representative or intermediary (where permission has been granted)
- Use of plain English
- rest or comfort breaks in meetings

6.4 In some instances, we may provide reasonable adjustments for tenants who are not disabled but may have a special need. Although it is not possible to list all such circumstances, some examples include:

- providing translation services or interpreters for customers whose first language is not English, and
- providing extra support for customers with literacy problems.

## **7 How to request a reasonable adjustment**

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7.1 A reasonable adjustment can be requested from us in several ways:

- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email;
- By telephoning us or talking to us face to face;
- 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; and or
- A member of staff may suggest for one to be made, when they are aware it will support the customer's needs.

7.2 We will provide information on how a reasonable adjustment can be requested in various ways such as on our website, in publications, as part of the new resident sign up process and when communicating with residents.

## **8 Our response to requests for reasonable adjustments**

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- 8.1 In most cases, we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. In some cases, we may need to consider in more detail how best to overcome the difficulty a disabled person is experiencing or seek advice from expert disability organisations that can assist with signposting and other forms of support. We would seek to make a formal decision within 10 working days.

## **9 Keeping a record of a customer's needs.**

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- 9.1 At the beginning of a resident's tenancy, they will be asked whether they have any support needs and/or any communication preferences.
- 9.2 These will be recorded on our databases and will be used in order to meet the resident's specific needs throughout the duration of their tenancy.
- 9.3 We will proactively check that we have the appropriate support flags and communication preferences recorded on our systems where information is missing or requires updating.
- 9.4 where no request is received but a disadvantage has been noted, a discussion concerning whether a reasonable adjustment is required, and the nature of any adjustment will be noted.
- 9.5 Appeal - if a resident is dissatisfied with a decision, the matter will be escalated to a senior manager for a review of the decision in 10 working days.

## **10 Reasonable adjustments to our complaints process**

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- 10.1 If necessary, we will make reasonable adjustments to our complaints process in order to provide equal access. Examples of the reasonable adjustments we can make if you need help making a complaint are as follows:
- You can appoint a family member or friend to act on your behalf, or
  - A family member, friend or representative can attend meetings with you

## **11 Complaint**

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- 11.1 CDS is committed to providing a high standard of service, dealing with everyone in a way that is fair and free from discrimination. If someone is dissatisfied with the arrangements, we have made for providing reasonable adjustments, we will respond in accordance with our Complaints Policy.

## **12 Equality and diversity**

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- 12.1 We will make sure everyone is treated fairly and without discrimination, regardless of their race, gender, sexual orientation, disability, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and age. We will promote inclusion, challenge discrimination and seek to make reasonable adjustments to ensure that everyone can access our services and that no one is excluded inappropriately from any services or activities provided by us.
- 12.2 To ensure inclusivity for all residents and accommodate the diverse communication preferences, this policy can be translated or provided in various formats upon request.

## **13 Monitoring and continuous improvement**

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- 13.1 We will review this policy every three years, when necessary for business reasons, and whenever there are changes to laws, regulations or best practice

## **14 Confidentiality**

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- 14.1 CDS will collect and process data in line with our current Data Protection Policy.
- 14.2 All information provided will be treated with confidence and will only be passed to external agencies with prior consent.
- 14.3 CDS is committed to working in partnership with other agencies like DWP, Housing Benefit departments, social services, councils' homelessness teams and other relevant organisations in accordance with their local procedures and information sharing protocols. This is essential to enable these organisations to carry out their statutory duties.

## **15 Legislation and Regulation**

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(This is not an exhaustive list)

- Equality Act 2010
- Data Protection Act 2018
- Housing Ombudsman Complaint Handling Code

## **16 Associated policies and procedures**

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Related Documents:

- Complaints Policy
- Data Protection Policy
- Equality, Diversity & Inclusion Policy

### **Version control**

Date	Amendment	Version control
25-11-2024	New policy approved by board	V1.0