



## **POLICY: REASONABLE ADJUSTMENTS**

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Copies of this Policy may be made available in alternative formats on request.

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## **POLICY: REASONABLE ADJUSTMENTS**

All reference to 'we', 'our' or 'us' in this Policy should be read as meaning Sandbourne Housing Association.

A reasonable adjustment is a physical change or a change to working practice to avoid or correct a disadvantage to a person with a disability.

### **1. Purpose and aim of the Policy**

- 1.1 We are committed to ensuring that disabled people are not disadvantaged in accessing our services. To achieve this, we will make reasonable adjustments for disabled people. This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and:
  - 1.1.1 confirms our commitment to improving accessibility for everybody that we deal with
  - 1.1.2 sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people
  - 1.1.3 sets out the factors that we will take into account in dealing with requests for reasonable adjustments.
- 1.2 Many of the arrangements that we offer for disabled people can also be made available for those who do not have disabilities. For example, provision of documents in larger font than our usual font.
- 1.3 This policy applies to all our customers.

### **2. The Equality Act 2010**

- 2.1 The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. Although not specifically listed as a public body under the Act, as an employer, and as a provider of services to the public, we commit to comply with the provisions for public bodies under the Act.
- 2.2 Under the Act the legal duty to make reasonable adjustments arises in three circumstances:
  - 2.2.1 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.

- 2.2.2 Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- 2.2.3 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.
- 2.3 Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.

### **3. What is a reasonable adjustment?**

- 3.1 To make an adjustment means to make a change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability.
- 3.2 Examples of this include:
  - 3.2.1 allowing more time than we would usually for someone to provide information that we need; or
  - 3.2.2 providing specialist equipment or additional support such as a sign language interpreter for a meeting or event.

### **4. Requesting reasonable adjustments**

- 4.1 We will let people know that we can provide reasonable adjustments for example in the following ways:
  - 4.1.1 By including a paragraph in written communications (eg acknowledgement letters).
  - 4.1.2 By including a note on our published documents indicating that we can provide the document in an alternative format on request.
  - 4.1.3 By publishing our policy on our website.
  - 4.1.4 By working with key representative groups and others to raise awareness of this policy.

### **5. Types of reasonable adjustment we can offer**

- 5.1 There is no definitive or 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.
- 5.2 Some examples of the adjustments that staff can make include:
  - 5.2.1 provision of some auxiliary aids

- 5.2.2 provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc)
- 5.2.3 extension of time limits (where it is lawful to do so)
- 5.2.4 use of alternative forms of communication such as email or telephone in preference to hard copy letters
- 5.2.5 communication through a representative or intermediary
- 5.2.6 rest or comfort breaks in meetings.

## **6. Our response to requests for reasonable adjustments**

- 6.1 In the majority of 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.

## **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:
  - 7.1.1 The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person.
  - 7.1.2 The practicality of us making the adjustments.
  - 7.1.3 The availability of our resources including external assistance and finance.
  - 7.1.4 Any disruption to the service that making the adjustment may cause.
- 7.2 Effectiveness
  - 7.2.1 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.
- 7.3 Practicality
  - 7.3.1 For example, it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet.
- 7.4 Resources
  - 7.4.1 For an adjustment to be reasonable, it should be effective. However, it is important to remember that 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.

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

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

7.6 Potential Disruption to our activities

7.6.1 For example, it would not usually be reasonable for a member of staff to cease work on all other matters 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.

7.7 Monitoring

7.7.1 We will record and monitor the reasonable adjustments (usually on the tenancy file or database) 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.

## **8. Dealing with complaints**

8.1 We are committed to provide a high standard of service, dealing with everyone in a way that is fair and free from discrimination.

8.2 If someone is dissatisfied with the arrangements we have made for providing reasonable adjustments we will, if appropriate, seek advice from expert disability groups and/or legal advice before responding in accordance with our Complaints Policy.

## **9. Equality impact assessment/Protected characteristics (as at 15 April 2024 or later amendments/additions)**

9.1 Neutral.

## **10. Consultation arrangements**

10.1 We will consult all residents and recognised residents' bodies on any substantive changes to this Policy and their views will be taken into account by the Board before approving it. Our staff will also be consulted on any substantive changes to this Policy and any reasonable suggestions will be taken into account before the Policy is approved by the Board.