

# REASONABLE ADJUSTMENTS POLICY

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### **Executive Summary:**

Our Reasonable Adjustments Policy demonstrates the organisation's commitment to ensuring equal access to its services for all individuals, including those with disabilities. The policy outlines the principles and procedures for making reasonable adjustments to accommodate disabled and less abled individuals. It also emphasises proactive measures to anticipate and eliminate barriers, offers guidance on requesting adjustments and outlines the factors considered in evaluating the reasonableness of these adjustments.

Policy Grouping/Directorate(s)	People & Culture		
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Notes:	'	1	

### 1 Introduction

- 1.1 At RBH (Rochdale Boroughwide Housing) we are unwavering in our commitment to ensure equal access to our services for everyone, including people with registered and non-registered disabilities. We recognise the importance of making reasonable adjustments to accommodate individuals.
- 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
  - Confirms RBH's commitment to improving accessibility for **everyone** that uses RBH services.
  - Sets out some of the basic principles of RBH's commitment to provide reasonable adjustments for disabled people.
  - Sets out the factors that RBH will consider when dealing with requests for reasonable adjustments.
- 1.3 This policy applies to all RBH customers and is focussed on the provision of services and RBH's approach to delivering excellent customer service. Separate policies exist with regards to making reasonable adjustments for disabled employees and reasonable adjustments in the context of people accessing and living in RBH homes (see Links with other RBH documents below).
- 1.4 Many of the arrangements that RBH offer for disabled people can also be made for those who do not have disabilities. This policy will be accompanied by a toolkit and programme of training to ensure that any decisions around changes to service delivery to meet individual needs are made in a fair and consistent manner.

### 2 Context

- 2.1 RBH's vision is 'People succeeding together to offer great services and places to live and work.' Understanding the diverse needs of our customers and tailoring services to meet those needs is key in delivering great services.
- 2.2 The **Equality Act 2010** provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. With regards to reasonable adjustments this means adjusting in the following 3 circumstances
  - Where a provision, criterion, or practice places a disabled or less abled person at a significant disadvantaged compared to non-disabled individuals.
  - Where a physical feature puts a disabled person at a substantial disadvantage in comparison to an abled body person.
  - 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.

### **Definitions:**

**Substantial** is defined in the Act as 'more than minor or trivial'.

**Disabled** is defined in the Act as 'a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day to day activities.

The Tenant Involvement and Empowerment Standard states that Registered Providers shall:

- Treat all tenants with fairness and respect
- Demonstrate that they understand the diverse needs of their tenants, including in relation to the equality strands and tenants with additional support needs.
- Registered providers shall demonstrate how they respond to tenants' needs in the way they provide services and communicate with tenants.

# 3 Aims & Objectives

## 3.1 The aims of the policy are:

- To ensure all customers are treated with fairness and respect.
- To advance equality of opportunity for disabled customers in particular
- To ensure no customer is disadvantaged or discriminated against
- To ensure all customers receive excellent customer service from RBH.

# 3.2 The policy fits with the mutual values of RBH:

Responsibility - We take responsibility for meeting the needs of disabled customers, whenever possible.

Equity – This policy will help ensure disabled customers are treated fairly and are not disadvantaged by the way in which RBH delivers services

# 4 Policy Statement

# 4.1 What is a reasonable adjustment?

A reasonable adjustment refers to making physical changes to premises or altering work practices to eliminate or correct disadvantages experienced by individuals with disabilities.

### **Examples include:**

- Providing specialist equipment or additional support such as a sign language interpreter for a meeting
- Use of email or telephone communications instead of hard-copy letters
- Allowing more time for someone to respond or provide information, compared to our usual practices.
- Offering rest or comfort breaks in meetings.

### 4.2 Anticipating needs

An Equality Impact Assessment (EqIA) is a process designed to ensure that a policy, strategy, project, or scheme does not unlawfully discriminate against any protected characteristic, which includes people with disabilities. RBH completes an EqIAs (Equality Impact Assessment) to assess if there may be barriers to disabled people accessing its services and look to make appropriate adjustments in advance rather than waiting for a disabled person to request this service.

For example, RBH have tools available on its website to assist people with visual impairments. Additionally, we subscribe to translating/interpreting services for quick access when needed.

### 4.3 Requesting/identifying a reasonable adjustment

RBH refrains from making assumptions about whether a disabled person requires adjustments or about the specific adjustments needed. Instead, RBH engages in a dialogue with the individual affected to determine what adjustments may be reasonable adjustments through various means:

- Including a paragraph in written communications.
- Customers should be asked periodically if they require any reasonable adjustments.
- Enquiring about the need for reasonable adjustments over the telephone or face-to-face meetings.
- Including a note on documents indicating that they can be provided in an alternative format on request.
- Publishing this policy on our website(s).
- Collaborating with customer groups to raise awareness of this policy.

# 4.4 Our response to a request for reasonable adjustments

In most cases, RBH can agree and implement the required reasonable adjustments with minimal delay. However, in some situations, seeking specialist advice from external agencies may be necessary. The Equality Act does not explicitly define what is "reasonable," but guidance from the Equality and Human Rights Commission suggests that key factors include:

- The effectiveness of the adjustment(s) in reducing the disadvantage for the disabled person.
- The practicality of implementing the adjustment(s).
- The availability of resources, including external assistance and financial considerations.
- Any potential disruption to the service caused by implementing the adjustment.

If you are unsatisfied with our response or the adjustment, put in place, you can file a complaint, which we will address in accordance. with our complaints policy.

### 5 Monitoring

- 5.1 RBH maintains a log of all requests and their outcomes. This enables RBH to review the services it provides and identify opportunities for further enhancements to benefit all its customers.
- 5.2 RBH will use the responses to the questions in our customer satisfaction survey regarding **treating people with respect** and **ease of access** to monitor the effectiveness of this policy

### 6 Review

6.1 All RBH strategies, policies, service standards and procedures are reviewed on a regular basis to ensure that they are 'fit for purpose' and comply with all relevant legislation and statutory regulations.

6.2 This policy will go through the full policy approval process every 3 years and will undergo a desktop review annually. This is to ensure that it is fit for purpose and complies with all relevant and statutory regulations.

# 7 Links with Other RBH Documents

- 7.1 This policy links to the following policies and strategies:
  - Adaptations Policy
  - Lettings Policy
  - Data Strategy

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