



**IPSWICH**  
BOROUGH COUNCIL

## **Housing Services Reasonable adjustment policy**

We can provide a copy of this policy in alternative formats (for example, in large print or Braille, as an audio file, or on coloured paper)

<b>Version number</b>	<b>Signed off by</b>	<b>Written/Amended by</b>	<b>Last Updated/Reviewed</b>	<b>Date of next review</b>
<b>V.1</b>	I.Blofield	E. Cook	7 January 2020	7 January 2022
<b>V.2</b>	I. Blofield	E.Cook	12 March 2020	7 January 2022

## **Introduction**

This policy keeps to the Housing Ombudsman Service Complaint Handling Code and our commitments under the Equality Act 2010.

In line with the Regulator of Social Housing's Tenant Involvement and Empowerment Standard, we need to:

- 'provide choices, information and communication that is appropriate to the diverse needs of tenants', and
- 'demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs'.

We are committed to making sure that disabled people are not disadvantaged when getting access to or using our services. For this reason we will make 'reasonable adjustments' for disabled people.

This policy does not explain how we will approach every situation. It provides general information on our policy and:

- confirms our commitment to improving tenants' and leaseholders' access to our services
- defines what a reasonable adjustment is, when and how we will make them, and how you can ask for them, and
- what we will consider when dealing with requests for reasonable adjustments.

Many of the arrangements we offer for disabled people (for example, providing documents in large print) can also be made available to tenants and leaseholders who do not have disabilities.

This policy applies to all our tenants and leaseholders. Where it refers to 'tenants', this includes leaseholders.

## **The Equality Act 2010**

The Equality Act 2010 (the Act) protects people's rights and aims to provide equal opportunities for everyone.

Under the Act, we must make reasonable adjustments in the following three circumstances:

- If there is a policy, practice or procedure which disadvantages a disabled person significantly more than a person who is not disabled.
- If a physical feature disadvantages a disabled person significantly more than a person who is not disabled.
- If a disabled person without any aids, adaptations or support service would be disadvantaged significantly more than a person who is not disabled.

If the circumstance relates to providing information, the steps it is reasonable for us to take include making sure that information is provided in an accessible format (for example, in Braille or as an audio file).

In relation to physical features, the steps it is reasonable for us to take to avoid a significant disadvantage include:

- removing the physical feature
- altering it (for example, providing a ramp or handrail), or
- providing a reasonable way of avoiding it (for example, an alternative entrance or dedicated parking).

A physical feature includes:

- the design or construction of a building
- an approach to, exit from or access to a building
- a fixture or fitting, furniture, furnishings, materials, equipment and so on in or on the premises, or
- any other physical structure, item or quality.

If we have a legal duty to make reasonable adjustments, we cannot charge you any costs of us keeping to that duty.

We are committed to providing a high standard of accessibility to our services. We will therefore make sure our approach takes account of all tenants with disabilities. Under the Equality Act 2010, a person is considered to have a disability if:

“he or she has a physical or mental impairment and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities”.

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

A reasonable adjustment is any kind of change it is reasonable for us to make so people with disabilities are not disadvantaged when it comes to getting access to or using our services.

Reasonable adjustments may include changing work practices.

Examples of such changes include:

- allowing more time than usual for you to provide information that we need
- providing specialist equipment or extra support such as a sign-language interpreter.

When carrying out our role as a landlord we will always consider beforehand what we can do to make sure disabled tenants are not disadvantaged.

## **Asking for reasonable adjustments**

We will let tenants know that we can make reasonable adjustments.

We will do this by:

- including a paragraph in written communications such as letters
- asking you whether you might need a reasonable adjustment
- including a note on our published documents to say that we can provide the document in an alternative format, and
- publishing this policy on our website.

You can ask us for a reasonable adjustment by:

- sending us a letter or email to explain what adjustment you need and why you need it
- contacting us online through our website, or
- phoning our Customer Service Centre.

A family member, friend or representative can ask for an adjustment for you, if you have given us permission to deal with them.

A member of council staff may suggest an adjustment if they know it will help you.

In most cases we can agree to and make the necessary adjustment without delay. However, in some cases we may need to consider in

more detail how best to overcome the difficulty you are having or get advice from disability organisations.

We may need medical evidence, for example to identify the effect or disadvantage that we need to tackle or to confirm that a particular adjustment would be effective. We would pay any costs involved in getting this information.

### **Types of reasonable adjustments we can offer**

There is no set list of reasonable adjustments. The adjustments we can provide depend on your needs. We will discuss your needs with you and try to agree what may be reasonable in the circumstances. We will not make assumptions without talking to you.

What is reasonable can depend on a number of factors including:

- the disadvantage caused
- what difference the adjustment would make
- if the adjustment is what is needed to make the difference or if it is more than is necessary
- what will put you in the same position as others using the service, and
- the cost of the adjustment.

What is unreasonable in one situation might be reasonable for someone else. If we cannot make a reasonable adjustment due to cost or resources, we will work with you to find the most appropriate alternative solution.

Examples of adjustments that we can make include:

- providing information in alternative formats (for example, in large print or Braille, as an audio file, or on coloured paper)
- giving you more time to do something (if this is allowed by law)
- communicating with you by email or phone instead of by letter,
- dealing with a family member, friend or representative (if you have given us permission to do so), and
- providing breaks in meetings.

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, examples are:

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

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

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 we can help you find a representative.
- A family member, friend or representative can attend meetings with you.

### **Equality impact assessments**

We carry out an equality impact assessment each time we develop or review a policy, procedure of service. The assessment is to help us make sure our decisions are fair and do not disadvantage any disabled person.

### **Appeals**

If you are not satisfied with the arrangements or decision we have made about a reasonable adjustment, we will respond in line with our complaints policy.

When we review our decision we may get advice from disability groups or get legal advice.

### **Review**

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