

Reasonable Adjustments Policy

Linked strategies	All Live Greatwell Strategies
Version	1
Date approved by (State by whom and when)	27 June 2022
Policy level	2
Agreed by Union (If applicable)	n/a
Date effective (Subject to staff consultation)	TBC
Date of next review	27 June 2025
Policy Owner	Head of Customer Excellence

1 Policy Statement

- 1.1 Greatwell Homes are committed to making sure our services can be easily accessed by all customers including those with disabilities and/or additional needs.
- 1.2 This policy does not aim to explain how we will approach every circumstance where a customer requires a reasonable adjustment to access a service or use their home. It is a general statement of our commitment to ensure customers with disabilities are not at a disadvantage when accessing our services or in the enjoyment of their home.
- 1.3 The policy defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.
- 1.4 Many of the adjustments we offer could also be made available to our customers without disabilities.
- 1.5 This Policy complies with the Equality Act 2010 and any subsequent guidance.

2 Scope

- 2.1 The policy covers all services delivered by Greatwell Homes and applies to both existing customers and prospective new customers nominated for housing via Keyways, who are at a 'substantial disadvantage' compared to those without a disability when accessing services and/or in the enjoyment of their home.

3 Definitions

- 3.1 **Customer** - A tenant, sub-tenant of leaseholder, of Greatwell Homes.
- 3.2 **Reasonable adjustment** – is an adjustment made in our service delivery to meet customer's specific needs, ensuring our services can be accessed by all where practically possible.

Reasonable adjustments to service delivery can be changes to policies, practices in terms of an agreement or the way we do things as a landlord - like when or how we collect rent. They can also mean providing extra equipment or support - the law calls this auxiliary aids.

An 'auxiliary aid' could include asking to change some features in the home to make it easier for a customer to live there with their disability.

However, anything that would involve removing or altering a physical feature or make any changes to common parts are not considered to be a reasonable adjustment. For example, structural changes, removing walls, widening doorways, or installing permanent ramps. These types of works may be covered by our Adaptations Policy.

The following are not considered to be alterations to physical features:

- replacing or providing signs or notices
- replacing taps or door handles
- replacing, providing or adapting a doorbell or door entry system
- changing the colour of a wall, door or any other surface.

3.2.1 **Reasonableness** - the Equality and Human Rights Commission suggests the following considerations when we determine whether an adjustment is 'reasonable' or not:

- How effective the adjustment(s) will be in assisting a customer with a disability and in preventing or reducing the possibility of them being at a disadvantage.
- The practicality of making the adjustment(s).
- The cost of the adjustment(s) and whether this is possible within Greatwell Homes' resources (and that of its third-party sub-contractors) and;
- Any disruption to the service that making the adjustment(s) may cause.

3.2.2 In the circumstance where we are unable to make a reasonable adjustment due to cost and resources, we will work together with the customer to try to find the most appropriate alternative solution wherever possible.

3.2.3 Where we are not fully able to meet a customer's specific request to make a reasonable adjustment to the way in which a service is accessed/delivered we will provide a clear written explanation, referencing points as per 3.2.1 above to support our rationale for this decision.

4 **Policy Principles**

4.1 Through the implementation of this policy Greatwell Homes' primary aim is to ensure that our services can be accessed by all customers including those with disabilities or additional needs where practically possible and ensure our compliance with the requirements of The Equality Act 2010.

4.2 **The Equality Act 2010**

4.2.1 Under the Equality Act 2010 (The Act) 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

4.2.2 The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

4.2.3 Under the Act, we have a legal duty to make 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.

4.3 Reasonable Adjustments

4.3.1 A reasonable adjustment can be requested from us in the following ways:

- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email.
- By telephoning our Customer Services contact centre.
- By referral from a local authority or other relevant agency.
- By a named third-party advocate, where we have been given permission by our customer for them to act on their behalf, and/or
- A member of staff may recommend a reasonable adjustment(s), when they are aware it will support the customer's specific needs.

4.3.2 In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail how best to meet the needs of a customer with disabilities and/or seek advice from expert disability organisations/medical professionals that can assist with signposting and other forms of support.

4.3.3 Where a customer is not happy with our decision regarding their request for a reasonable adjustment, they have the right of appeal. This can be done in writing, email or via the telephone. The appeal will be considered by a Head of Service.

5 Implications for customers

- 5.1 We will make reasonable adjustments to our service provision to meet the needs of our customers, where it does not have a negative impact on our resources, our efficiency and our practical ability to complete the request.
- 5.1 A Privacy Impact Assessment (PIA) has been completed for this policy (a copy is available on request). It found customer data (including some sensitive information relating to health and disability) is collected as part of this policy.
- 5.2 An Equality Impact Assessment has been completed. A copy is available on request.
- 5.3 We will consult with our involved customers via our Equalities & Diversity Group “Together Greatwell” as part of any review or revision of this policy.

6 Performance Management

- 6.1 We will report our performance on the number of requests made and number granted to enable effective monitoring of the service to EMT and Board via Business Performance reports

7 Responsibility and Decision Making

- 7.1 The table below illustrates the structure for responsibility and decision making in relation to this policy

Person Responsible	Scope
Head of Customer Excellence	<ul style="list-style-type: none"> • Overall responsibility for ensuring that all activities are undertaken, and all performance measurements are met
Customer Involvement Manager	<ul style="list-style-type: none"> • Responsible for ensuring consultation is carried out with involved customers
Customer Experience Manager	<ul style="list-style-type: none"> • Responsible for the day-to-day application and adherence to this policy
Operational Managers	<ul style="list-style-type: none"> • All managers are responsible for reading, understanding and adherence to this policy
All staff	<ul style="list-style-type: none"> • All staff are responsible for reading and understanding and adherence to this policy

8 Review

- 8.1 This Policy will be reviewed every three years or in line with changes in legislation,

whichever is the sooner, updates or recommendations for changes will be presented to EMT for approval.

Associated Policies	Associated Procedures
Adaptations Policy	Adaptations Procedure
Allocations Policy	
Equality, Diversity, and Inclusion Policy	