

# Reasonable Adjustments Procedure

<b>Linked policies</b>	Reasonable adjustments Policy
<b>Version</b>	Version 1
<b>Date approved by</b>	EMT – 27 June 2022
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<b>Procedure owner</b>	Customer Experience Manager



## **1 Introduction**

1.1 This procedure sets out the process and guidance to support the Reasonable Adjustments Policy and to ensure compliance with the requirements of the Equality Act 2010.

1.2 The aim of this procedure is to provide guidance to staff on how to make Greatwell Homes services easily accessible to customers, including those with disabilities and/or additional needs where practicably possible and it is reasonable and proportionate to do so.

## **2 Legislative Context**

2.1 Equality Act 2010 - under the Act the legal duty to make reasonable adjustments arises in three circumstances:

- 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
- Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled
- 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.

Substantial disadvantage is defined in the Equality Act 2010 s.212 (1) as 'more than minor or trivial'

## **3 Scope**

3.1 This procedure provides the working methodology for the management of all reasonable adjustment requests from a customer of Greatwell Homes. It is designed to aid staff in ensuring that customer requests for reasonable adjustments are managed effectively and the rationale for decisions can be clearly evidenced.

This procedure applies to all staff and customers.

- 3.2 Anything that would involve removing or altering a physical feature to a property or make any changes to common parts are not considered to be a reasonable adjustment and, therefore, fall outside the scope of this procedure and associated policy e.g., 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.

## 4 Definitions

- 4.1 **Customer** - A tenant, sub-tenant of leaseholder, of Greatwell Homes.

- 4.2 **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 these 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).

- 4.3 **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)
- Any disruption to the service that making the adjustment(s) may cause.

## 5 Procedure

### 5.1 Initial Customer request for reasonable adjustment (minor or major)

5.1.1 There are several ways a customer can make a request i.e.

- By telephoning our Customer Services contact centre.
- In writing explaining what the adjustment is and why it is needed (this can be done via customer portal, email or letter)
- 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
- By a member of staff may recommend a reasonable adjustment(s), when they are aware it will support the customer's specific needs.

### 5.2 Minor Reasonable Adjustment Request

5.2.1 Where the request is a minor modification to the way in which a service is provided and/or accessed then the officer receiving the request can agree the necessary adjustment with the customer without referring to their manager for agreement.

It is essential when managing a customer request to:

- Focus on the person's needs
- Avoid making assumptions
- Remember every disabled or neurodivergent person's experience is different
- Try to understand the customer's experience and how their disability impacts them
- Be sensitive, some diagnoses are long term or potentially terminal

If you feel the adjustment being requested is not reasonable then refer the request directly to your line manager providing as much information as possible (advising the customer of the named person you are referring their request to)

**Note:** Customers with complex mental health needs (are classed as disabled under the Equality Act 2010) as such this needs to be considered when delivering services.

- 5.2.2 Where the officer handling the customer request is able to agree to a minor reasonable adjustment, **they should add a UDC by selecting RAMI** (reasonable adjustment minor) and updating the customer's account clearly noting the agreed adjustment within the notes.

Note: It is important to gain the customer's permission for this, explaining why we need to maintain a record of their request to meet their needs and ensure that we have a clear and accurate record of what adjustment has been agreed.

### 5.3 Major Reasonable Adjustment Request

- 5.3.1 Where a customer is requesting a **major** adjustment to the way in which a service is being delivered then their request should be formally noted by the officer receiving the request and passed to the relevant service manager for consideration.

*When receiving a request from a customer or a third party acting on their behalf (with AFD) please complete Appendix 1 – Major Reasonable Adjustment Request form and send to the relevant service manager for consideration (please remember to raise a work item to ensure traceability of the request) and put notes on Orchard account.*

**Remember: major adaptation requests do not fall within the remit of this policy and procedure (please refer to our Adaptations Policy)**

- 5.3.2 The service manager will review the customer request and contact the customer or their third-party advocate for any additional information or clarification they require to assist in the decision-making process.

A decision should be made as quickly as is reasonably possible and not exceed **15 working days** from the date of the request unless there is good reason to do so i.e., awaiting additional supporting information for customer or third-party professionals that is needed to make the decision / aid a full risk assessment of the request.

- 5.3.3 The outcome of the request should be confirmed in writing to the customer clearly outlining decision.

If the request has been **agreed**, then confirmation of the timescale when the adjustment can be put in place should also be given in writing.

A UDC should be added to the customer's account – **RAMA** (reasonable adjustment major)

- 5.3.4 Where a request for a major reasonable adjustment is **refused** the rationale for the refusal should be clearly explained in writing, along with advising the customer of their right to appeal the decision within 20 working days – this request can be made either verbally or in writing whichever is the customer's request.

**Note: The officer receiving the customer's request to appeal the decision should complete Appendix 2.**

## **5.4 Right of appeal**

- 5.4.1 A review of the refusal will be undertaken by a Head of Service and a response will be given in writing within **15 working days** from receipt of the request, unless there is good reason to do so i.e. awaiting additional supporting information from customer or third party professional(s) that is needed to inform the decision / aid a full risk assessment of the reasonable adjustment request.
- 5.4.3 If the decision is to make the requested reasonable adjustment a UDC should be added to the customer's account – **RAMA** (reasonable adjustment major)
- 5.4.4 If the request is declined under the right of appeal, there will be no further review held unless there is a change of circumstances whereby a customer can then make a new request for consideration.

## **6 Data and Record Management Systems**

- 6.1 Applications and customer contact regarding their request for reasonable adjustments will be held on our Housing Management system (Orchard) with updates added to the customer's individual tenancy account.

The use of Clearview will aid reporting by pulling down information from UDC's enabling organisational oversight of reasonable adjustments that have been made.

## **7 Performance Management**

7.1 The effectiveness of this policy will be monitored with the aid of a report via Clearview as noted in section 6.1.

## 8 Responsibility and Decision Making

8.1 The tables below illustrate the structure for responsibility and decision making in relation to this procedure

Person Responsible	Scope
Head of Customer Excellence	<ul style="list-style-type: none"> <li>Overall responsibility for ensuring that all activities in the procedure are undertaken and all performance measurements are met</li> </ul>
Customer Experience Manager	<ul style="list-style-type: none"> <li>Responsible for ensuring staff adhere to this procedure and meet individual performance measurements.</li> </ul>
Operational Managers	<ul style="list-style-type: none"> <li>Responsible for ensuring staff adhere to this procedure.</li> <li>Responsible for review and decision making on major reasonable adjustment requests</li> </ul>
Head of Service	<ul style="list-style-type: none"> <li>Responsible for ensuring staff adhere to this procedure.</li> <li>Responsible for holding appeal review and final decision on major reasonable adjustment requests</li> </ul>
Officers	<ul style="list-style-type: none"> <li>Responsible for receiving, recording and adhering to this procedure</li> </ul>

## 9 Review

9.1 These procedures will be reviewed to comply with any changes in good practice, legislation, or regulation, and in line with the relevant current policy which will be no less than once every three years.

## **10 Appendices**

10.1 Appendix 1 - major reasonable adjustment request  
Appendix 2 – major reasonable adjustment request appeal



## Appendix 1 – Customer Reasonable Adjustment request

Name:

Address:

Telephone:

Email:

Date received and by whom:

<b>Request:</b>
<b>How will request prevent / reduce the disadvantage to customer</b>
<b>Supporting evidence from third party</b> (where applicable)

### Office Use

Manager reviewing request	
Date of review	
Notes	
Additional Info required and from whom	
Risk Assessment yes / no	
Where yes – outcome / recommendations	
Decision	
Date customer advised	
UDC added to customer account	
Orchard notes updated	

## Appendix 2 – Customer Major Reasonable Adjustment request - APPEAL

Name:

Address:

Telephone:

Email:

Date of appeal:

<b>Appeal Request and rationale:</b>
<b>How will request prevent / reduce the disadvantage to customer</b>
<b>Supporting evidence from third party (where applicable)</b>

### Office Use

HOS reviewing appeal	
Date of review	
Notes	
Additional Info required and from whom	
Risk Assessment yes / no	
Where yes – outcome / recommendations	
Decision	
Date customer advised	
UDC added to customer account	
Orchard notes updated	

