



Reasonable Adjustments Policy

Version:	2
Date of SMT Approval & effective date:	15 th January 2025
Last Reviewed:	30 th March 2022
Next review date:	March 2027
Document owner	Housing Manager

Introduction

EHA Housing Association (EHA) is committed to ensuring that disabled people are not disadvantaged in accessing our services or living in our homes. EHA will make reasonable adjustments for disabled people.

As a specialist housing provider for people with disabilities, making reasonable adjustments is integral to all that EHA do and is demonstrated in our values:-

- Understanding the needs and complexity of independent living with support
- Asking tenants their opinion and involving them in the decision-making process to enable choice
- Ensuring our colleagues are trained with tenants as our focus
- Managing operating costs whilst still putting our tenants first
- Constantly reviewing and improving practice to ensure a quality service
- Obtaining feedback to review service delivery and performance

The Regulator of Social Housing's Transparency, Influence and Accountability Standard requires us to 'understand the diverse needs of (our) tenants, including those arising from protected characteristics, language barriers, and additional support needs' and to 'assess whether all tenants have fair access to, and equitable outcomes of, housing and (our) landlord services'.

This policy confirms our commitment to improving accessibility for everybody that lives in an EHA home or wants a home with EHA. It also sets out some of the principles of our commitment to provide reasonable adjustments for disabled people and what we will take into account in dealing with requests for such adjustments.

Scope of the Policy

The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. As an employer and as a provider of services to the public, EHA commits to comply with the provisions for public bodies under the Act.

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'.

The Policy

What is a Reasonable Adjustment?

To make an adjustment means to make a physical change to premises or to change work practices (including policies and procedures) to avoid or correct the disadvantage to a person with a disability.

Examples of this include:

- Providing specialist equipment/aids
- Providing information in appropriate alternative formats (e.g. large print, Braille, coloured paper etc)
- Use of email or telephone in preference to hard copy letter
- Use of plain English
- Communication through a representative

The Equality Act's Code of Practice suggests that, when deciding whether an adjustment is reasonable, the following issues should be considered:

1. The **effectiveness** of an adjustment in preventing or reducing the disadvantage for the disabled person – for example, the adjustment should be designed to fully address the disadvantage it is meant to overcome
2. The **practicability** of the adjustment – for example, it may not be necessary or practical to have a wheelchair accessible toilet on every floor of an office, providing that at least one such toilet is available to wheelchair users
3. The financial and other **costs** of any adjustment – for example, if a tenant requests higher specification of an aid or adaptation than the standard item issued, as long as the standard item will perform the same task, it may be reasonable to refuse on grounds of cost, provided the alternative is suitable
4. The extent of the **disruption** caused – for example, it would not be practical for a colleague to devote all of their time to one tenant, as other tenants would inevitably suffer

5. The availability of **financial or other assistance** – for example, a grant for funding may be available to supplement any adjustment needed

Making a Request for Reasonable Adjustments

Tenants can request a reasonable adjustment at any time when contacting us. It is both encouraged and recommended that we should be made aware of the request as soon as possible so that we may deal with the request in the most effective way. It is not necessary to put the request in writing but there may be times where we ask for further information or supporting evidence to action a request.

We will always try to meet a tenant's request where it is reasonable to do so.

We will publish our Reasonable Adjustment Policy on our website and ensure that by working together with tenants, families, Social Services, Care Providers and Commissioners, we raise awareness of this policy and the adjustments we can and will make.

If a tenant is unhappy with any decision made in relation to reasonable adjustments, they are able to make a complaint via our Complaints and Feedback Policy and Procedure.

EHA also uses Equality Impact Assessments (EIAs) to ensure how we deliver services and the supporting policies and procedures do not present barriers or disadvantage to tenants from any protected group under the Equality Act 2010. Requests for reasonable adjustments and how we respond further demonstrates our commitment to ensuring accessibility to services and homes for tenants.

Responsibilities

The Housing Manager has overall responsibility and accountability for this policy and its implementation.

All EHA colleagues have a responsibility to follow the principles of this policy.

Related Legislation, Regulation and Codes of Practice

- Social Housing Regulation Act 2023
- Equality Act 2010
- Regulator of Social Housing Consumer Standards
- Housing Ombudsman's Complaint Handling Code
- Supported Housing Regulatory Oversight Act 2023

Related Policies, Procedures and Documents

- Complaints and Feedback Policy and Procedure
- Equality, Diversity, and Inclusion Policy
- Aids and Adaptations
- Data Retention Policy
- Safeguarding Adults and Children Policy

Reporting and Monitoring

We will record and monitor the reasonable adjustments 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.

Significant adjustments will be reported to the Board on a quarterly basis to ensure transparency and informed decision-making. This regular reporting will allow the Board to stay updated on any important changes and provide timely oversight.

Consultation and Publicising Policy

The following groups have been consulted with in the development of this policy.

- Management Team
- Senior Management Team

This policy will be published on EHA website.

Review

This policy may be reviewed at any time and will normally be reviewed every 3 years unless any changes are required due to legislation, good practice, regulatory requirements, or business changes.

Equality Impact Assessment

An Equality Impact Assessment has been completed for this policy