

CROYDON CHURCHES HOUSING ASSOCIATION

REASONABLE ADJUSTMENTS POLICY

1.0 Introduction

- 1.1 ccha are committed to making sure that our services are easily accessible by people with disabilities and/or additional needs and to making reasonable adjustments for people with disabilities.
- 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 our commitment to ensure customers with disabilities are not disadvantaged when accessing our services.

2.0 Aims and Objectives

- 2.1 This policy defines what a 'reasonable adjustment' is, how a request for a reasonable adjustment can be made and in what type of circumstances they will be carried out.
- 2.2 This policy applies to all our customers including residents, and many of the adjustments we offer to our services can also be made available to our customers without disabilities.

3.0 The Equality Act 2010

- 3.1 Under the Equality Act 2010 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.
- 3.2 The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.
- 3.3 Under the Act, we have a legal duty to make reasonable 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.

4.0 What is a reasonable adjustment?

4.1 A reasonable adjustment involves making a change to the way that we usually do things to remove or reduce the effect of a person's disability. It is important that we make reasonable adjustments to ensure that we are fair to everyone and that everyone has equal access to our services and enjoyment of their homes.

4.2 A reasonable adjustment could be a physical change to a premises or a change in working practices to avoid or correct the disadvantage to a person with a disability.

4.3 Examples of this include:

- Allowing more time than usual for someone to provide information that is needed; or
- Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event.

5.0 How to request a reasonable adjustment

5.1 A reasonable adjustment can be requested from us in a number of ways:

- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email;
- By telephoning us or talking to us face to face;
- By referral from a local authority or other relevant agency;
- By a family member when we have been given permission for them to do so; and or
- A member of staff may suggest for one to be made, when they are aware it will support the customer's needs.

5.2 We will provide information on how a reasonable adjustment can be requested in various ways such as on our website, in publications, as part of the new resident sign up process and when communicating with residents.

6.0 Types of reasonable adjustment we can offer

6.1 There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

6.2 Some examples of the adjustments that we can make include:

- provision of auxiliary aids

- provision of information in appropriate alternative formats (e.g. large print, Braille, coloured paper etc)
- extension of time limits (where it is lawful to do so)
- use of email or telephone in preference to hard copy letters
- use of plain English
- communication through a representative or intermediary
- rest or comfort breaks in meetings

7.0 Our response to requests for reasonable adjustments

7.1 In the majority of cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. In some cases, we may need to consider in more detail how best to overcome the difficulty a disabled person is experiencing or seek advice from expert disability organisations that can assist with signposting and other forms of support.

8.0 How is 'reasonable' defined?

8.1 The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission Suggest that the most relevant factors are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person;
- The practicality of us making the adjustments;
- The availability of our resources including external assistance and finance;
- Any disruption to the service that making the adjustment may cause.

8.2 In the circumstance where we are unable to make a reasonable adjustment due to cost, resources or disruption to others, we will work together with the customer to find the most appropriate alternative solution for them.

9.0 Keeping a record of a customer's needs

9.1 At the beginning of a resident's tenancy/licence/lease, they will be asked whether they have any support needs and/or any communication preferences.

9.2 These will be recorded on our databases and will be used in order to meet the resident's specific needs throughout the duration of their tenancy/licence/ lease.

9.3 We will proactively check that we have the appropriate support flags and communication preferences recorded on our systems where information is missing or requires updating.

9.4 Where no request is received but a disadvantage has been noted, a discussion concerning whether a reasonable adjustment is required and the nature of any adjustment will be noted.

10.0 Complaints

10.1 We are committed to providing a high standard of service, dealing with everyone in a way that is fair and free from discrimination. If someone is dissatisfied with the arrangements we have made for providing reasonable adjustments, we will respond in accordance with our Complaints Policy.

11.0 Confidentiality & Data Protection

11.1 Under the Data Protection Act 2018 and the Human Rights Act 1998, all personal and sensitive organisational information, however received, is treated as confidential. This includes:

- anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff or committee member, or;
- sensitive organisational information.

11.2 For the purposes of this policy and how we manage the information that we hold on individuals as part of our management processes, ccha will comply with its obligations under the Group Data Protection Policy.

11.3 We will share information with third parties where we have an information sharing protocol in place, there are safeguarding concerns, or we have a duty to do so for the purpose of crime prevention under the provisions of the Crime and Disorder Act 1998.

11.4 We will process personal data and information in accordance with the Data Protection Act 2018, General Data Protection Regulation 2018 and our Data Protection policy and procedures.

11.5 Disability and reasonable adjustment data may be used to review and improve services and to help us understand whether there are any wider steps we can take to improve our services. Information may also be included as part of our Equality and Diversity reporting.

12.0 Fair and Equal Treatment

12.1 We will make sure everyone is treated fairly and without discrimination, regardless of their race, gender, sexual orientation, disability, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and age. We will promote inclusion, challenge discrimination and seek to make reasonable adjustments to ensure that everyone can access

our services and that no one is excluded inappropriately from any services or activities provided by us.

12.2 We complete an equality impact assessment each time we develop or review a policy, procedure or service. The assessment is to help us make sure our decision making is fair and does not present any barriers or disadvantage to customers from any protected group (including disability) under the Equality Act 2010.

12.3 An Equality Impact Assessment has been undertaken and has indicated that this policy would not discriminate against any specific groups.

12.4 As part of our Equality, Diversity and Inclusion Strategy, all staff receive training that is specifically aimed at promoting diversity and addressing barriers that individuals from protected groups (including disability) may face when accessing our services.

13.0 Legislation and regulation: (This is not an exhaustive list)

- Equality Act 2010
- Data Protection Act 2018
- Housing Ombudsman Complaint Handling Code

14.0 Related Documents:

- Complaints Policy
- Data Protection Policy
- Housing Ombudsman Complaint Handling Code Self-Assessment
- Equality, Diversity & Inclusion Strategy and Policy
- Equality Impact Assessment Toolkit

Version History	
Policy Name	Reasonable Adjustments Policy
Version Code	1.0
Lead Officer	Director of Customers
Equality Impact Assessment	July 2023
Data Protection Impact Assessment	July 2023
Resident Consultation	To be carried out at next review
Colleague Consultation	July 2023
Date of Issue	July 2023
Review Date	July 2026
Policies and Procedures Replaced	N/A
Amendments Made	N/A