

the **calico** group

Policy

Title: Reasonable adjustment policy

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Approved by: Home Senior Leadership Team

Last full review date: October 2024

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This document relates to:



1.0 PURPOSE

Calico Homes is committed to ensuring services are easily accessed by all customers, including those who have additional needs or disabilities. This policy is in place to ensure we continue to deliver high standards in customer service, meet customers' needs and align these standards with the principals set out in our Customer and Equality, Diversity and Inclusion Strategies.

This policy has been written in accordance with our duties and commitments under the Equality Act 2010. Additionally, the Regulator of Social Housing's Tenant Involvement and Empowerment Standard, requires us to "provide choices, information and communication that is appropriate to the diverse needs of (our) tenants" and to "demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs."

This policy does not explain how we will approach every situation; it will do the following:-

1. Confirm our commitment to improving accessibility for all of our customers
2. Set out the principles of our commitment to provide reasonable adjustments for customers who require them
3. Details what factors we will take into account when dealing with requests for reasonable adjustments
4. Explain how customers can appeal if they do not agree with Calico Homes decision relating to their circumstances

2.0 SCOPE / LEGAL REQUIREMENTS

Calico Homes must operate within the framework created by legislation, This policy has been written regarding relevant legislation which includes (non-exhaustive) list:

- Equality Act 2010
- Social Housing (Regulation) Act 2023
- Human Rights Act 1998
- The Regulator for Social Housing- Consumer Standards
- The Housing ombudsman's Complaint Handling Code

As a provider of services to the public, Calico Homes has a legal duty to ensure that customers are not prevented from using our services because they have a disability.

Under the Equality Act 2010, the duty to make reasonable adjustments falls into three areas:

1. When changing a policy, procedure or any standard practices
2. Where a physical feature puts a disabled customer at a substantial disadvantage in comparison with customers who are not disabled

3. Where a disabled person, without the provision of an additional aid or service, would be put at a substantial disadvantage in comparison with customers who are not disabled

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

3.0 WHAT IS A REASONABLE ADJUSTMENT?

A Reasonable Adjustment is a legal term described in the Equality Act (2010). It means that Calico Homes have a duty to make reasonable adjustments where it's working practices (including policies and procedures) or physical premises put a disabled customer at a substantial disadvantage in comparison with customers who are not disabled.

A reasonable adjustment involves making a change to the way Calico Homes usually does things to take account of a customer's individual needs. It is not possible to produce an exhaustive list of reasonable adjustments Calico Homes can make as an adjustment can only be determined as reasonable or not in relation to a specific set of circumstances and will be dependant on the customer's needs. We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be. In addition, reasonable adjustments are not only for customers who are disabled, but for any customer who needs a different approach. This helps us to ensure our services are personalised where we can.

Some examples of the adjustments that we can make include:

- Assistive aids e.g. magnifiers for reading, audio newsletters, grab rails
- Adaptations to a customer's home such as wide doors, ramps or fitting a lift.
- Information in appropriate alternative formats (eg large print, Braille, coloured paper etc.)
- Use of email or telephone in preference to hard copy letters
- Use of plain English or Easy Read service
- Communication through a representative or intermediary
- Speaking clearly to our customers with the offer of additional time to cover the issues they need to discuss.
- Providing an interpreter (including sign language) when appropriate
- Arranging home visits for those who have particular mobility difficulties.
- Providing services or appointment times to take account of medical needs or special circumstances.

4.0 REQUESTING A REASONABLE ADJUSTMENT

We will let people know that we can provide reasonable adjustments in the following ways;

- Asking whether a reasonable adjustment might be required over the telephone.
- Publishing our policy on our website.
- Including a note on our published documents and letters indicating that we can provide documents in an alternative format on request.
- Identify where reasonable adjustments may be required when we are delivering services to you or carrying out home visits.

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 Service Centre.
- By referral from a local authority or other relevant agency.
- By a family member/advocate when we have been given permission for them to do so.
- A member of staff may suggest for one to be made, when they are aware it will support the customer's needs.

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 overcome the difficulty a customer with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support.

5.0 DECIDING WHAT IS REASONABLE

The Equality Act does not define what is 'reasonable' but we can use guidance from the Equality and Human Rights Commission to identify the most relevant factors in deciding what is reasonable. These are:

1. The **effectiveness** of an adjustment in preventing or reducing the disadvantage for the disabled person. The adjustment should be designed to fully address the disadvantage it is meant to overcome. For example, providing an audio version of documents may not properly overcome the barriers faced by the disabled person if there are other requirements that need to be overcome, for example the customer also has a hearing impairment.
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 **resources** for the adjustment. An adjustment may be deemed as effective but can still not be reasonable. For example, resourcing is not just about the cost, but it may involve other factors for example recruiting additional staff with specific skills. If an adjustment costs a significant amount, it may not be reasonable to make the adjustment if the organisation does not have the money to do so.

4. The **disruption** to services caused by an adjustment. For example, it would not be reasonable for a staff member to devote all of their time to one customer, as other customers would inevitably suffer. The amount of extra time provided must therefore be reasonable in all the circumstances.

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

In the unlikely event that a reasonable adjustment is not able to be made, we will work with the customer to find the most appropriate alternative solution.

6. Keeping a record of the customer's needs

As part of our pre-tenancy work, customers will be asked about whether they have any support needs and their communication preferences.

These will be recorded into our housing management system and will be used to meet the customers specific needs throughout the duration of their tenancy. Where appropriate, we will use relevant warning markers on our housing management system.

We will proactively keep this information up to date for the duration of the tenancy by;

- Checking when a customer contacts us to request a service
- Checking when we visit or deliver a service to a customer
- Periodic tenancy audits.

5.0 GUIDANCE

As a general rule, Calico staff should follow the following approach;

1. **Ask – don't assume**. Remember that many disabilities or additional needs are not necessarily visible or obvious. Therefore, we should ask our customers routinely whether they need additional support. We don't need to be intrusive – we should explain how we would normally deal with an issue the person has raised and then ask: "Do you need any additional support, for example because of a disability or other special circumstance?" That leaves the way open for the person to tell you as much or as little as he or she chooses about the circumstance whilst still requesting the support they need.

2. **Listen**. Most customers with disabilities or extra needs will know what support they need and will tell you how you can help them. Try to meet their request where it is reasonable to do so.

3. **Be flexible**. Customers in similar sets of circumstances may have different ways of dealing with them – just because people have a similar disability or need, it does not mean that they will require the same support. Additionally, customers needs may change over time, and so we should not assume that because a

customer had extra needs in the past, they will still require this today. Knowing our customers current circumstances and needs are essential.

6.0 APPEAL

If a customer is unhappy with any decision made by Calico Homes in relation to reasonable adjustments they can appeal via our customer feedback policy. Customers can access this via our website, by telephone, email, letter, portal message or in person to any Calico Homes employee.

7.0 RELATED POLICIES/STRATEGIES

Customer feedback policy

Adaptations policy

Customer strategy

8.0 REVIEW

This policy will be reviewed every 2 years unless there are changes to legislation, regulation, best practice or a business need.