

Reasonable Adjustment Policy

Date Reviewed	April 2024	Next Review Date	November 2026
Consultation	Customer Panel	Reviewed By	Ramesh Malhan
EIA	Complete	Responsible Officer	Head of Customer Voice
DPIA	Complete	Approval By	Executive Team

1. Purpose

Black Country Housing Group (BCHG) is committed to providing a person-centred approach to accessibility by ensuring we remove as much as we can, through reasonable adjustment, any disadvantage faced by a protected characteristic or a vulnerability. It forms part of our values driven approach, 'The BCHG Way,' and not just about compliance and risk mitigation.

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

- Confirm our commitment to improving a person-centred approach to accessibility for all our customers.
- Set out the guiding principles of our commitment to provide reasonable adjustments.

2. Scope

This Policy applies to BCHG customers. It does not apply to colleague related issues.

The Housing Ombudsman Service Code of Guidance for Complaint Handling includes the need for housing providers to have a Reasonable Adjustment Policy which is separate or forms part of their Complaints Policy. The Transparency Influence and Accountability Consumer Standard expects landlords to treat tenants and prospective tenants with fairness and respect.

The basis for this is that BCHG has a legal duty to ensure that customers are not prevented from using our services because of a protected characteristic or vulnerability.

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. Anticipating the needs of customers who will use our services.

2. Where a physical feature puts a customer at a substantial disadvantage because of a protected characteristic or vulnerability.

3. Where a disabled person for example, 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. Definitions

What is a Reasonable Adjustment?

The Equality Act 2010 states that a reasonable adjustment is to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a protected characteristic or vulnerability.

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

- The effectiveness of the adjustment(s) 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.
- The practicality of us making the adjustments – for example, it may not be practical for us to adjust a time because of legal requirement laid down.
- The availability of our resources including external assistance and finance. Most adjustments will involve little cost, and a person-centred approach will seek ways to remove any disadvantages.
- Any disruption to the Service that making the adjustment may cause. For example, it would not be practical for a staff member to devote all their time to one customer, as other customers would inevitably suffer.

Types of Reasonable Adjustment we can make.

It is not possible to produce an exhaustive list of reasonable adjustments because a person-centred approach recognises and is responsive to a specific set of circumstances and is agreed with by customer.

Some examples of the adjustments that staff can make include:

- Change the timing of an appointment.
- Providing home visits
- Provision of aids such as induction loop, videophone
- Provision of information in appropriate alternative formats (e.g., large print, Braille, coloured paper etc.

- Not insisting a complaint is put in writing.
- Allowing more time than we would usually.
- Consider cultural sensitivities and religious beliefs.
- Use of email or telephone in preference to hard copy letters
- Use of plain English or Easy Read service
- Communication through a representative, advocacy, intermediary or interpreter
- Or support through a representative, advocacy, intermediary or interpreter
- Providing additional support for emotional health, sensory or sign language interpreter
- Signpost or connect customers with support services.

4. Related Policy / Procedure and other Documents

- Complaint Policy
- Complaint Procedure
- Goodwill and Compensation Policy
- Customer Success Strategy
- Equality, Diversity, Inclusion Strategy
- Hate Crime Policy

5. Roles and Responsibilities

The responsibility for the implementation of this Policy is the Head of Customer Voice. Oversight of this Policy is the responsibility of the Deputy Chief Executive.

Director of People is responsible for ensuring that awareness raising and training is in place for staff to understand the requirements of the Equality Act and best practice.

All staff are responsible for assessing needs and requirements to make sure BCHG service is accessible and inclusive to all customers.

The Executive Team is responsible for making sure BCHG has a culture that is person centred and responsive to the needs of customers.

6. Guiding Principles

Our guiding principles fall under 3Rs and underpinned by our values the BCHG Way, so they are cross cutting.

6.1 Recognise

'We Care' - Proactively to recognise we will assess anticipating needs through an equality impact assessment on new policy, strategy, and project.

We will ask and not assume. There are for example vulnerabilities that are visible and others that are not visible. We will ask our customers if they need additional support. We

will not be intrusive with our questions or ask for medical evidence, we will be respectful, listen and show empathy.

We will make sure staff are aware of their responsibilities. We will make customers aware of our reasonable adjustment approach through written communication, telephone, face to face and in recognition of the preference types of customers.

6.2 Record

'We do the right thing' – We will keep this information up to date and work with customers to support us in doing this where it is practical to do so.

6.3 Respond

'We do what we say we will' – we will take a person-centred approach, take responsive action, and agree on a timescale with the customer. We will use insights to help improve how we respond.

7. Policy Details

7.1 Data Processing

Any personal data will be stored on the Housing System or securely on the SharePoint system and will be deleted in line with the Data Retention and Disposal Policy.

BCHG recognises that under this policy sensitive individual and medical data may be recorded, will be used in confidence, and stored securely and used only for the purpose intended.

We regularly review the data we hold and aim to do so through annual visitation. At any point, the customer can update their records with us and are encouraged to do so.

7.2 Legal and Regulatory Considerations

- Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>
- Housing Ombudsman Complaint Handling Code 2024 <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>
- Regulator of Social Housing, Consumer Standards 2024
- Care Act 2014

7.3 Equality Diversity & Inclusion

This Policy aims to create accessibility and inclusiveness. An Equality Impact Assessment has been conducted with a positive impact.

8. Compliance, Monitoring & Reporting

We are learning and improving organisation and will seek learning from complaints. Where reasonable adjustments are requested, these are recorded on the Housing System and used responsively. We will use feedback to identify the effectiveness of those adjustments and whether the customer suffered any exclusion because of poor considerations. This will in turn help us to review our services.

The quarterly Customer Voice report to BCHG Board will include any ongoing learning and customer feedback.

Dealing with complaints about our service

Whilst we are committed to providing a high standard and responsive service, we will not always get everything right for every customer. If someone is dissatisfied with the arrangement, we have made for providing reasonable adjustments as part of the complaints process, we will respond by our complaints policy. We will seek advice from disability groups when required to do so.