



Reasonable Adjustments Policy

Lead Manager:	Neighbourhood Manager
Responsible Senior Manager:	Assistant Director of Housing
Approved By:	Customer Committee
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1. Introduction

- 1.1. Shropshire Towns and Rural Housing (STAR) is an Arms' Length Management Organisation; (ALMO) and manages the stock on behalf of Shropshire Council. It is responsible for the Council's housing stock including the letting, maintenance, and management of its properties and estates.
- 1.2. We are committed to ensuring all our customers have equal access to our services whatever their circumstances and one of the ways we do this is through reasonable adjustments to remove barriers or reduce any disadvantage.
- 1.3. This policy sets out our definition of reasonable, provides an overview of the types of adjustments we will consider and how customers can request a reasonable adjustment. It is not practical or reasonable to cover every scenario in which a reasonable adjustment may be considered within this policy, but we are committed to considering and adjusting services where appropriate, on a case-by-case basis in a sensitive, confidential and person-centred way that ensures every customer is treated fairly and with dignity.
- 1.4. This policy sets out STAR's approach to identifying and assisting vulnerable tenants, with the overall aim of helping them to sustain and maintain a tenancy.
- 1.5. The policy applies to all STAR customers, including potential customers.

2. Legal Framework and context

- 2.1. This policy has been written in accordance with the Housing Ombudsman Service's Complaints Handling Code and our commitments under the Equality Act 2010.
- 2.2. Under the Equality Act 2010 (The Act) 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. The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.
- 2.3. Under the Act, we have a legal duty to make 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.
- 2.4. The policy also seeks to ensure we meet the requirements of the Regulator of Social Housing’s Consumer Standards, specifically the Transparency, Influence and Accountability that sets out:
- Registered providers must use relevant information and data to:
 - understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and
 - assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services.
 - Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.
 - Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.
 - Registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.

3. Policy statement

- 3.1. We are committed to making sure our services can be easily accessed by customers with disabilities and/or additional needs.
- 3.2. We will make it easy and simple for our customers to request a reasonable adjustment from us.
- 3.3. We will be clear, open, and transparent about what reasonable adjustments we can offer, whilst also considering all options that may be viable to customers in individual circumstances.
- 3.4. We will ensure all reasonable adjustments are recorded effectively on our systems and made available to all staff and contractors so they can fulfil all agreed reasonable le adjustments.
- 3.5. This policy does not aim to explain how we will approach every circumstance where a customer with disabilities requires a service to be adjusted. It is a general statement of our commitment to ensure customers with disabilities are not at a disadvantage when accessing our services.
- 3.6. The policy defines what a ‘reasonable adjustment’ is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.
- 3.7. Many of the adjustments we offer to our services can also be made available to our customers without disabilities.

4. What is a reasonable adjustment?

- 4.1. A reasonable adjustment may be a physical alteration to one of our premises, for example, fitting a lift, wide doors, Level Access Shower, or a ramp.
- 4.2. It may also be a change to one of our policies, procedures or services, for example, a comfort or rest break in a meeting or an extension of time limits (where lawful to do so).
- 4.3. We will adjust how we communicate with our customers in order to meet their specific needs. For example, providing information in alternative formats or a sign language interpreter at workshops and events.
- 4.4. In all circumstances, the reasonable adjustment is being made to ensure all of our services can be equally accessed by customers with disabilities, as well as those who do not.

5. How to request a reasonable adjustment

- 5.1. 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
 - By referral from Shropshire Council 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. 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.

6. How do we define 'reasonable'?

- 6.1. The Equality and Human Rights Commission suggests the following considerations when we decide 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 STAR Housing making the adjustment(s).
 - The cost of the adjustment(s) and whether this is possible within STAR resources; and
 - Any disruption to the service that making the adjustment(s) may cause.

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

7. Keeping record of a customer's needs

- 7.1. At the beginning of a customer's tenancy, they will be asked whether they have any support needs and/or any communication preferences.
- 7.2. These will be recorded onto our internal systems and will be used in order to meet the customer's specific needs throughout the duration of their tenancy.
- 7.3. 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.
- 7.4. At tenancy sign-up we will review any information on vulnerability received from tenants or from other relevant agencies to assist in ensuring any offer of housing is right for the individual or household, and the most compatible form of tenure with the purpose of the housing in line with Shropshire Council's Allocation and Scheme.

8. Reasonable adjustments to our complaints process

- 8.1. We will make reasonable adjustments to our complaints service where necessary to, ensuring customers with a disability are not at a disadvantage when accessing the service.
- 8.2. Examples of the reasonable adjustments we will make are:
 - Using the customer's communication preference throughout the duration of the complaint.
 - We will not request a complaint to be made in writing where this presents a barrier or disadvantage to the customer due to their disability or additional needs.
 - Extension of any time limits (where it is lawful to do so); and
 - Provide information in alternative formats e.g. Braille, large print or on coloured paper.

9. Equality Impact Assessments

- 9.1. We complete an equality impact assessment each time we develop or review relevant policies, procedures, or services. 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.

10. Appeals

- 10.1. If a customer is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.

10.2. If necessary, when reviewing our decision, we will seek advice from specific expert disability groups.

11. Consultation

11.1. Shropshire Towns and Rural Housing consults with staff, external agencies, customer policy focus groups and STAR's customer subcommittee to promote continuous improvement and develop good practice in the use of this policy.

12. Review

12.1. STAR will review this Policy every 3 years, unless changes in legislation or regulation require an earlier review.

13. Training

13.1. STAR Housing will provide all staff responsible for implementing this policy with comprehensive training.

13.2. Training may be given to:

- New staff
- Existing staff on an annual basis as a refresher/update as required.
- All relevant staff after change to policy/legislation
- At any other times as identified by the Senior Neighbourhoods Officer

14. Roles and Responsibilities

All employees	General overview of Policy
HOs / HSOs	Implementation of Policy
SNOs	Line Management Responsibility of neighbourhood officers in the implementation of this policy
Neighbourhood Manager	Overall responsibility for the operational day to day implementation of this policy. Monitoring performance indicators and management information and day to day oversight of the quality of service and outcome
Assistant Director of Housing	Accountable for the implementation of this policy and for reporting performance to key stakeholders including SMTs, ET and CCB

15. Equality and Diversity

- 15.1. We will ensure that this policy is applied fairly and consistently to all our customers.
- 15.2. We will not directly or indirectly discriminate against any person or group of people because of their race, religion, age, gender, marital status, sexual orientation, disability or any other grounds set out in our Equality, Diversity and Inclusion Strategy.
- 15.3. When applying this policy, we will act sensitively towards the diverse needs of individuals and communities.
- 15.4. When applying this policy, we will take the necessary positive action to reduce discrimination and harassment in local communities.
- 15.5. This policy and any other related publications of STAR are available on request in other formats (e.g., in an alternative language, in Braille, on tape, in large type).