

Reasonable Adjustments Policy

Lead Directorate: Corporate Services

Approved by: Customer Focus Committee, November 2020

Version: 1

1. Introduction

Plymouth Community Homes is committed to making sure that disabled people are not disadvantaged in accessing services. To this end we will make reasonable adjustments for disabled people. This policy does not try to explain how we will approach every situation, it is intended as a general statement of our policy and applies to all Plymouth Community Homes customers

- it confirms our commitment to improving accessibility for everybody that we deal with
- sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people
- sets out the factors that we will take into account in dealing with requests for reasonable adjustments

It is the organisations intent to make reasonable adjustments; Plymouth Community Homes will endeavor to respond to identified requirements if resources allow, and there is the financial capacity to deliver the change.

This policy sits alongside the Plymouth Community Homes Adaptation Policy, however each policy has its own clearly defined approach.

2. The Equality Act 2010

Under the Equality Act 2010 (the Act) public sector organisations have to make changes in their approach or provision to make sure that services are accessible to disabled people as well as to everybody else.

Although not specifically listed as a public body under the Act, as an employer, and as a provider of services to the public Plymouth Community Homes 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'

3. Reasonable Adjustments

3.1. What is a reasonable adjustment?

To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability.

Examples of this include:

- providing a nearby parking space
- providing specialist equipment or additional support such as a sign language interpreter
- changes to policies, procedures and staff training to ensure that services work equally well for people with a disability

3.2. Requesting reasonable adjustments

We will let people know that we can provide reasonable adjustments for example in the following ways:

- by including a paragraph in written communications (e.g. acknowledgment letters)
- by asking whether a reasonable adjustment might be needed over the telephone
- by including a note on our published documents indicating that we can provide the document in an alternative format on request
- by publishing our policy on the Plymouth Community Homes website
- by providing the information in visual format

3.3. Types of reasonable adjustment we can offer

There is no set list of reasonable adjustments; the adjustment will depend on the individual's needs. We will discuss the requirements with the person concerned and try 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.

Some examples of the adjustments that staff can make include:

- providing auxiliary aids
- providing information in appropriate alternative formats (e.g. large print, braille, colored paper, etc.)
- extra time added for dealing with a complaint
- choice of email or telephone contact instead of hard copy letters

- communication through a representative or intermediary
- rest or comfort breaks in meetings

3.4. Our response to requests for reasonable adjustments

In the majority of cases we will be able to agree and provide 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 get advice from expert disability organisations that can assist with signposting and other forms of support.

3.5. How do we decide what is reasonable?

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 making the adjustments
- the availability of **resources** including external assistance and finance
- any disruption to the Service that making the adjustment may cause.

3.5.1 Effectiveness

The adjustment should be designed to 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.

3.5.2 Practicality

For example it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet.

3.5.3 Resources

For an adjustment to be reasonable, it should be effective. However, it is important to remember that an adjustment which is believed to be effective, may not be considered 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 is more likely to be reasonable to make the adjustment if the organisation has substantial financial resources.

The reasonableness of an adjustment will be evaluated against the resource available to Plymouth Community Homes. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

3.5.4 Potential Disruption to Plymouth Community Homes Activities

It would not usually be reasonable for a member of staff to stop working on all other cases and devote all of their time to one person as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

4. Monitoring

We will record and monitor the reasonable adjustments (usually on the individuals case recording file) 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.

5. Dealing with complaints about our service

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. If necessary when reviewing our decision we will get advice from specific expert disability groups or seek legal advice.