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# Reasonable Adjustment Policy

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# Documentation Master Sheet

Amendments to this Document are Detailed Below

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
01	02/10/2020	New Policy	8 <sup>th</sup> October 2020	AP	Tenant Panel
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## INTRODUCTION

GCH is committed to ensuring that disabled people are not disadvantaged in any way in accessing our services. This includes carrying out physical adjustments or changes to premises or to work practices to avoid or correct the disadvantage to a person with a disability.

Examples of this include:

- Allowing more time than we would usually for someone to provide information, for example in responding to an Anti-Social Behaviour complaint
- Providing specialist equipment or additional support such as providing an accessible car parking space for disabled customers

This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and;

- Confirms our commitment to improving accessibility for everybody
- 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.

Many of the arrangements that we offer for disabled people can also be made available for those who do not have disabilities. For example, provision of documents in larger font than our usual font.

## SCOPE OF POLICY

This policy applies to all GCH customers and staff and covers all services, venues, relevant supporting policies, and practices, including GCH's Medical Adaptations policy and Equality Strategy

## LEGAL AND REGULATORY EXPECTATIONS

The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. GCH has a legal duty and responsibility to give "due regard" to the need to eliminate discrimination, advance equality of opportunity and foster good relations where it exercises a public function under the provisions of the Act. We are committed to both meeting and exceeding our legal responsibilities, to minimise any adverse impact on our employees, residents or communities.

Under the Act the legal duty to make reasonable adjustments arises in three circumstances:

- Where there is a provision, requirement 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'

## SERVICE STANDARDS

### 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. acknowledgement letters)
- By asking whether a reasonable adjustment might be required 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 our website
- By working with key representative groups and others to raise awareness of this policy

### Promoting Tenancy Sustainment

GCH is committed to promoting tenancy sustainment and to support customers to maintain their tenancy. Tenancy sustainment refers to a customer's ability to successfully manage a tenancy independently or with tailored support. It would also include consideration of any support requirements due to vulnerability, health or disability issues

For new customers to GCH we will complete pre-tenancy diligence checks which includes the following;

- Completion of a pre-tenancy interview to understanding a customers housing needs and support requirements. This includes vulnerability and disability.
- To request a copy of any existing support plans/packages provided where there are identified support needs. This would include the scope and purpose of the support, the accountable support worker, the named support organisation/provider, the duration of the plan and the review mechanisms.
- Referral as required for additional support to a third party partner agency eg Floating Support
- To complete a pre-tenancy financial assessment based and to develop an action plan of support if required, including money management advice,

benefit optimisation or debt advice. This would include advice on benefits which customers may be entitled to based on health and disability factors.

- Clarify whether the applicant or member of their household has any medical or mobility factors, which would require an Occupational Therapy assessment, ensuring any adaptations that are required to meet the needs of the household to be considered before the customer moves into their new home. It may also conclude that a particular property is not suitable for the customer or members of their household on medical/ health grounds and a different type of property would be more beneficial to meet their needs.
- For applicants who sign up to a GCH tenancy medical and health information is added to the Housing Management system in accordance with our Privacy Notice and provisions of the Data Protection Act 2018.
- For applicants moving into Independent Living accommodation individual Health & Well Being Plans are completed to capture medical, disability and support requirements.

### **Types of reasonable adjustment we can offer**

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.

Some examples of the adjustments that staff 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 or Easy Read service
- communication through a representative or intermediary
- rest or comfort breaks in meetings.

### **Our response to requests for reasonable adjustments**

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.

### **How do we decide what is reasonable?**

The Equality Act does not define what is 'reasonable', but we will follow guidance from the Equality and Human Rights Commission which suggests that the most

relevant factors are:

- The **effectiveness** of the adjustment(s) 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.
- The **practicality** of us making the adjustments - For example, it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet.
- The **availability** of resources including external assistance and finance. For example, recruiting additional staff with specific skills.
- The **reasonableness** of an adjustment will be evaluated against the resource available to GCH. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.
- Any **disruption** to the wider delivery of services that making the adjustment may cause - For example, it would not be reasonable for a Housing Officer to cease work on all other cases and devote all of their time to one customer to the detriment of other customers.

In changing policies, requirements or practices the legislation does not require GCH to change the basic nature of the service we offer.

## CONSULTATION

The policy and been consulted on with the GCH Tenant Panel, who also regularly review service performance and complaints.

## APPEALS

We are committed to provide 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 seek advice from specific expert disability groups or seek legal advice.

## REVIEW

We will record and monitor the reasonable adjustments that have been requested and made through our Customer Relationship Management system. 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.

We will include a review of all reasonable adjustment requests and responses in our annual Equality & Diversity update report which goes to both Tenant Panel and Board.



This policy will normally be reviewed triennially to ensure that it remains fit for purpose, unless an earlier review is required due to regulatory, statutory, or other requirements.

**Gloucester City Homes Limited**

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