

Reasonable adjustments policy v1.0

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Document owner: Head of Communications

See also: Complaints Policy

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This Policy will be applied in a way that will not discriminate on the grounds of the race, gender, marital status, disability, sexual orientation, religion or belief, pregnancy or maternity status, gender reassignment, or age of the employee concerned. It applies to all staff.

| Version number | Amendment | Amended by | Date |
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Newlon is committed to ensuring that disabled people are not disadvantaged in accessing or receiving the services we provide. This reasonable adjustments policy sets out the steps we take to meet this commitment.

Introduction

Newlon is committed to ensuring that disabled people are not disadvantaged in accessing or receiving services from us. To achieve this we will make reasonable adjustments for disabled people.

This policy cannot cover our approach to every situation, as many activities will be based on individual circumstances. It provides a general statement of our policy and:

- Confirms our commitment to improving accessibility for everybody that we deal with.
- Sets out the basic principles of our commitment to provide reasonable adjustments for disabled people.
- Sets out the factors we take into account in dealing with requests for reasonable adjustments.

This policy applies to all Newlon residents.

The Equality Act 2010

The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

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 as 'more than minor or trivial'.

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:

- Allowing more time than we would usually for someone to provide information that we need.
- Providing specialist equipment or additional support such as a sign language interpreter for a workshop, event or meeting.

Requesting reasonable adjustments

We will let people know that we can provide reasonable adjustments 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 statement 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 representatives groups and others to raise awareness of this policy.
- Reviewing any requirements for reasonable adjustments during tenancy sign-ups and as part of the sales process and as part of any vulnerability assessment.

Types of reasonable adjustment we can offer

There is no fixed list of reasonable adjustments as any adjustment will depend on individual needs.

We also have a separate aids and adaptations policy which outlines our approach to making modifications in individuals' homes to support independent living.

We will discuss the requirements for reasonable adjustments on an individual basis 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 we can make include:

- Provision of auxiliary aids.
- Provision of information in appropriate alternative formats including 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.
- Provision of communication in an Easy Read format.
- Communication through a representative or intermediary, subject to GDPR and appropriate authorisation to represent an individual.
- Additional rest or comfort breaks in meetings.

Responding 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 based on guidance from the Equality and Human Rights Commission the most relevant factors to consider 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 Newlon's resources including any external assistance and finance.
- Any disruption to services caused by making the adjustment.

Understanding Effectiveness, Practicality and Resources in providing reasonable adjustments

Effectiveness - the adjustment should be designed to fully address the disadvantage it aims to overcome. For example providing a screen reader for someone visually impaired cannot be provided solely as a means of supporting written communication as we are legally required to provide some updates and notices in hard copy, therefore we would still need to support provision of documents in braille or large print.

Practicality - it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet or there are urgent safety issues.

Resources - for an adjustment to be reasonable, it should be effective. However, an adjustment which is deemed effective, may not be considered reasonable. For example resourcing is not just about the cost, but could involve other factors such as recruiting additional staff with specific skills. If an adjustment costs a significant amount, it is only 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 provide the service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

In changing policies, criteria or practices we are not required to change the basic nature of the service we offer to provide a reasonable adjustment.

For example, it would not usually be reasonable for a member of staff to cease work 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 circumstances.

Monitoring

We will record and monitor reasonable adjustments that have been requested and made as 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.

Dealing with complaints about our service

We are committed to providing a high standard of service and 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 legal advice.