

# Reasonable Adjustments policy

**Board/EG Approval:** March 2024

**Responsible Board:** Ocean Housing Group Ltd

**Next Review:** March 2027

**Responsible Executive:** Managing Director of Ocean Housing Ltd

## 1.0 Policy Statement

1.1 Ocean Housing is committed to ensuring that people with a disability are not disadvantaged in accessing our services. This policy is intended to provide guidance on meeting individual needs covered by the Equality Act (2010) through offering appropriate adjustments. It is also to ensure we continue to deliver high standards in customer service, meet customers' needs and align these standards with those set out in our Equality, Diversity and Inclusion Strategy.

1.2 This policy does not explain how we will approach every situation, it does however:

- Confirm our commitment to improving accessibility for all of our customers
- Set out the principles of our commitment to provide reasonable adjustments for customers who require them
- Detail what factors we will take into account when dealing with requests for reasonable adjustments
- Explain how customers can appeal if they do not agree with Ocean Housing's decision relating to their circumstances

## 2.0 Policy Scope

2.1 As a provider of services to the public, Ocean Housing has a legal duty to ensure that customers are not prevented from using our services because they have a disability. Under the Equality Act 2010, the duty to make reasonable adjustments falls into three areas:

- When changing a policy, procedure or any standard practices
- Where a physical feature puts a disabled customer at a substantial disadvantage in comparison with customers who are not disabled
- Where a disabled person, without the provision of an additional aid or service, would be put at a substantial disadvantage in comparison with customers who are not disabled

2.2 *Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.*

### 3.0 What is a Reasonable Adjustment?

- 3.1 A Reasonable Adjustment is a legal term described in the Equality Act (2010). It means that Ocean Housing has a duty to make reasonable adjustments where it's working practices (including policies and procedures, or physical premises) put a disabled customer at a substantial disadvantage in comparison with customers who are not disabled.
- 3.2 It is not possible to produce an exhaustive list of reasonable adjustments since an adjustment can only be determined as reasonable or not in relation to a specific set of circumstances.
- 3.3 However, the Equality Act's Code of Practice suggests that, when deciding whether an adjustment is reasonable, the following issues should be considered:
- The **effectiveness** of an adjustment 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 **practicability** of the adjustment – for example, it may not be necessary or practical to have a wheelchair accessible toilet on every floor of an office, providing that at least one such toilet is available to wheelchair users
  - The financial and other **costs** of any adjustment – for example, if a customer requests higher specification of an aid or adaptation than the standard item issued, as long as the standard item will perform the same task – it may be reasonable to refuse on grounds of cost, provided the alternative is suitable
  - The extent of the **disruption** caused – for example, it would not be practical for a staff member to devote all of their time to one customer, as other customers would inevitably suffer
  - The availability of financial or other **assistance** – for example, a grant for funding may be available to supplement any adjustment needed

### 4.0 Adjustments that will be considered

- 4.1 Ocean Housing is committed to maintaining a high standard of accessibility to our services for all customers we come into contact with. We should therefore ensure our approach embraces all customers who have a mental or physical impairment as defined by the act as follows:
- 4.2 ***“If he or she has a physical or mental impairment and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day- to-day activities (S6(1))”***
- 4.3 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.

#### 4.4 Some examples of the adjustments that staff can make include:

- provision of auxiliary aids eg hearing loop
- provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc)
- extension of time limits (where it is lawful to do so)
- making changes to how we deliver a service outside of our published standards
- use of email or telephone in preference to hard copy letters
- communication through a representative or intermediary
- rest or comfort breaks in meetings
- Not visiting their home without an appointment

4.5 In some instances, we may provide reasonable adjustments in circumstances, which are not defined as a disability according to the Equality Act but will make services accessible to customers with special need or circumstance. This could include where a vulnerability has been identified.

4.6 Whilst it is not possible to list all such circumstances, below is a list of some examples:

- Providing translation or interpreting services for customers whose first language is not English
- Providing additional support for customers with literacy problems
- Providing written communication in an alternative format/colour for customers who are colour blind
- Signposting to digital support to access online services

## 5.0 Guidance

5.1 As a general rule, Ocean Housing staff should take the following approach if they believe it is appropriate to do so;

- **Ask.** Many disabilities or special needs are not necessarily visible or obvious. Therefore, we should ask our customers, if it is felt appropriate to do so, whether they need or would like additional support.
- **Listen.** Most customers with disabilities or special needs will know what support they need and will tell you how you can help them. We should try to meet their request, where it is reasonable to do so.
- **Be flexible.** Remember that people in similar sets of circumstances may have different ways of dealing with them – just because people have a similar disability, it does not mean that they will require the same support. For example, one deaf person may use British Sign Language and another may lip read.
- **Be honest.** If someone asks for an adjustment, which you are not sure we can provide, explain that you will need to check on what support is available and get back to them.
- **Seek help.** You should then discuss with your manager and the Head of Customer Experience how best to proceed.

- **Record.** Ensure that where a reasonable has been considered, the decision- and decision-making process is recorded.

## 6.0 Monitoring

- 6.1 Where possible we will record reasonable adjustments (usually on our database) 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.

## 7.0 Appeal

- 7.1 If a customer is unhappy with any decision made by Ocean Housing in relation to reasonable adjustments, they are able to appeal that decision using the Ocean Housing Compliments and Complaints policy.