

# **BUSHBURY HILL EMB**

## Reasonable Adjustments Policy

March 2025

## 1. INTRODUCTION

This policy sets out what a reasonable adjustment is and how arrangements can be made to ensure the services delivered by Bushbury Hill EMB (BHEMB) are accessible to all our tenants. This policy applies to everyone who uses our services and our employees and Board members.

## 2. POLICY STATEMENT

Bushbury Hill EMB are committed to make reasonable adjustments to ensure service users with disabilities, neurodiverse conditions (neurodiverse refers to the different ways a persons' brain processes information) and those with other health conditions have a fair and equal opportunity of access to our services.

We recognise that individual needs and vulnerabilities will not remain the same and may change over time and the service offer will need to be adapted accordingly.

We are committed to being a supportive diverse and inclusive organisation and will work with support workers, partner agencies, advocates and family members and any other professional with disclosure authority to meet individual needs.

When we identify any risk of harm, abuse or neglect we will refer to our Safeguarding Policies and procedures.

## 3. REGULATORY REQUIREMENTS AND LEGAL DUTIES

**The Regulator of Social Housing's Consumer Standards** requires registered landlords to:

- Ensure tenants are safe in their homes.
- Listen to tenants' complaints and respond promptly to put things right.
- Be accountable to tenants and treat them with fairness and respect.
- Know more about the condition of every home and the needs of the people who live in them.
- Collect and use data effectively across a range of areas, including repairs.

**The Equality Act 2010** provides a legislative framework to protect the rights of individuals and to advance equality for all. The Act imposes a legal duty to make reasonable adjustments, arising in three circumstances:

- Where there is a provision, criterion or practice which puts people with disabilities at a substantial disadvantage in relation to a relevant matter in comparison with people who are not disabled.
- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with people 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 people who are not disabled.

This will, in some circumstances, mean that disabled people receive more favorable treatment than non-disabled people, which is lawful in the context of disability.

**The Housing Ombudsman Service Complaint Handling Code 2024** states that landlords must consider their duties under the Equality Act 2010 and “anticipate the needs and reasonable adjustments of residents who may need to access the complaints process”.

**The Data Protection Act 2018 and UK GDPR** require us, as data controllers, to handle personal data with care, ensuring it is processed lawfully, fairly, and transparently. We must collect data for specific purposes, keep it accurate and up-to-date, and store it only as long as necessary. Additionally, we must protect data against unauthorized access and ensure its confidentiality. By adhering to these principles, we safeguard the privacy and security of information about the vulnerabilities of our customers and their household members, sharing it only when necessary and appropriate.

#### **4. WHAT IS A REASONABLE ADJUSTMENT?**

A reasonable adjustment is an action to ensure fairness to any individual who is accessing our services. This means that we may depart from our standard practice of our services for any person who is at a disadvantage from our normal procedure. Example of this include but are not limited to.

- Providing specialist equipment or facilities, eg: equipment to help the hearing or visually impaired
- Making sure access is available for people with Physical impairments such as wheelchair users as well as accessible rooms for meetings to be held.
- Providing additional support for Sign language users or non-English speakers.

We will discuss with you for any reasonable adjustments to be made and no assumptions will be made during this initial discussion.

##### **What do we mean by reasonable?**

The Equality Act 2010 does not define what is ‘reasonable’ but guidance from the Equality and Human Rights Commission suggests considering:

- The effectiveness 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 us making the adjustment(s).
- The cost of the adjustment(s) and whether this is possible within our resources.
- Any disruption to the service that making the adjustment(s) may cause.

Where we are unable to make a reasonable adjustment, due to cost or resources, we will work together with you to find the best alternative solution we can.

## **5. OTHER ADJUSTMENTS WE CAN OFFER**

We will consider all requests for a reasonable adjustment on an individual basis. These will need to be confirmed by any individual and agreed during our initial contact. Please note, that the items listed below are not covered under the Equality Act 2010 Examples of reasonable adjustments that we can make are.

### **Communication**

We recognise that communication is key when working with you and we will ensure that all communication is empathetic and focussed on the individual. We will seek to remove all potential barriers and adjust how we communicate with our customers.

A reasonable adjustment could be:

- Wherever possible, communicating via a method that best suits your needs e.g., phone, email, text.
- With consent, agree to communicate via a nominated contact.
- Providing specialist equipment or additional support, such as a sign language / interpreter if needed.
- Wherever possible, providing information in plain simple English, and other languages on request.
- Allowing more time to understand information and/ or make decisions (where it is lawful to do so).
- Recognising that not everyone will have digital access, and that digital exclusion could be a barrier to accessing services.
- Recognising there may be issues with literacy and adapting our contact methods accordingly.
- Not being reliant on a single method of contact.

### **Other examples of Reasonable Adjustments**

- Providing an ergonomic chair for a person with a hip or back problem.
- Providing a British Sign Language (BSL) interpreter and electronic note taker witness for a person who is deaf.

- Allowing a person with a visual impairment to make a request for service or complaint over the telephone rather than in writing.

To help us to make any adjustments in time to be able to help, we encourage disabled people to ask for any support as early as possible

## **6. REQUESTING A REASONABLE ADJUSTMENT**

To request a reasonable adjustment to be made, please contact our office by telephone, in person, by email or via our website. This contact can be made by you or by a family member or representative with delegated authority to discuss your tenancy or a partner agency working with you.

## **7. WHAT CAN YOU EXPECT FROM US WHEN YOU MAKE A REASONABLE ADJUSTMENT REQUEST?**

We will:

- Seek to understand the request and the reasons for this.
- We will consider the adjustment being requested to ensure this is the most appropriate adjustment or whether another adjustment may be more appropriate to meet and support the individual needs of the customer.
- In most cases, where possible, we will agree and deliver the required reasonable adjustment with minimal delay.
- In some cases, we may need to consider in more detail how best to overcome the difficulty our customer is experiencing or seek advice from our partner agencies that can assist with specialist advice and support.
- Take a person-centred approach and listen to the individual requirements you need.
- Encourage and support you to make their own choices and decisions about the services you need.

## **8. KEEPING A RECORD OF YOUR NEEDS**

- We will record and flag any known vulnerability or disability that you may have on our case management / IT systems.
- This includes, but is not limited to, any communication or access needs and if there is anyone with delegated authority to speak on their behalf.
- If you or a household member is recorded as having a disability or vulnerability, wherever possible, we will use this information to tailor our services to meet their individual needs.
- Our vulnerability and disability markers will be reviewed periodically to ensure the information stored is accurate and up to date.

- We recognise that your needs will not remain static and may change over time, and they will need to keep us updated on their circumstances.
- Upon request, we will make available to customers the markers flagged against them and the reasoning why it was added.
- We will ensure our data capture processes are robust, fit for purpose and collect meaningful data which can support the individual needs of our customers.

## **7. COMPLAINTS**

We aim to meet the needs of all our service users by providing an excellent service. However, occasionally things do go wrong, and you may wish to complain, please refer to our complaints policy.

## **8. MONITORING & REVIEW**

To make sure that service users of Bushbury Hill EMB are aware of our Reasonable adjustments policy. We will.

- Promote reasonable adjustments on our communication mail outs for example our Annual Report to Tenants.
- Make the Reasonable adjustments policy available on our accessible website for anyone to view.

Bushbury Hill EMB will record all requests for a reasonable adjustment whether they are accepted or refused. This will allow us to continue to monitor our policy and make changes as and when necessary.

**Board Approval Date: March 2025**

**Review Date: 2028**