



GUILDFORD
BOROUGH

Guildford Borough Council Housing Services

Reasonable Adjustment Policy

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1. Introduction

At Guildford Borough Council (GBC) we are committed to removing barriers for residents who have a vulnerability need. We will make reasonable adjustments to limit communication barriers when accessing our services. We also want to remove barriers that make it difficult for residents to live independently within their homes. We understand that residents who have a vulnerability may require us to make some reasonable adjustments to the way that we provide services or to make alterations within their home. This policy explains the basic principles by which we will make reasonable adjustments for people with disabilities, and the factors that we will consider when evaluating requests. We have considered relevant government legislation in the creation of this policy.

2. Policy Statement

The Council is committed to making sure that people with disabilities, and those with health conditions, receive an equitable service and are not disadvantaged. This policy describes our approach to making reasonable adjustments to our services for housing applicants, tenants and leaseholders with disabilities. Reasonable adjustments are used to help remove barriers and to promote equality for residents who have a vulnerability need. We want to ensure that we do not place a person with a vulnerability need at a substantial disadvantage compared to a person without a vulnerability need.

This policy does not explain how we will approach every situation; it provides guidance and confirms our commitment to improving tenants' and leaseholders' access to our services. This policy also defines what a reasonable adjustment is, when and how we will make them, how you can ask for them, and what we will consider when dealing with requests for reasonable adjustments.

3. Aims of the Policy

This policy outlines what is a reasonable adjustment and how these adjustments will be provided. A reasonable adjustment is any kind of change that is reasonable for us to make so people with disabilities are not disadvantaged when it comes to getting access to or using our services. Reasonable adjustments may include changing work practices. Examples of such changes include:

- allowing more time than usual for a person to provide information that we need
- providing specialist equipment or extra support such as a sign-language interpreter

This policy aims to ensure that:

- People with disabilities can access our services, as far as reasonably possible, in the same way people who don't have disabilities do
- Our staff understand our duty to make reasonable adjustments
- Our staff and contractors understand the types of adjustments they can make when delivering services to people with disabilities
- We anticipate adjustments that people with disabilities may require

4. Reasonable Adjustments

A reasonable adjustment involves making a change to the way we usually do things to make sure that our services are accessible and we are fair to all GBC tenants. These adjustments may come in a variety of forms such as a physical alteration to our premises, changes to our policies, procedures or ways services are operated, or adjusting how we communicate with people to meet their specific needs.

When providing a specific adjustment for an individual person, we will discuss and confirm this with the person or their representative to avoid making incorrect assumptions about a person's needs. In cases where we can't meet a

person's preferred adjustment, we'll work with them to find the best solution. Under the Act, we must make reasonable adjustments in the following three circumstances:

- If there is a policy, practice or procedure which disadvantages a person with a disability significantly more than a person who does not have a disability
- If a physical feature disadvantages a person with a disability significantly more than a person who does not have a disability
- If a person with a disability does not have any aids, adaptations or support service would they be disadvantaged significantly more than others without a disability.

If the circumstance relates to providing information, the steps that are reasonable for us to take include making sure that information is provided in an accessible format (for example, in Braille or as an audio file). In relation to physical features, the steps that are reasonable for us to take to avoid a significant disadvantage include:

- Removing the physical feature
- Altering it (for example, providing a ramp or handrail), or
- Providing a reasonable way of avoiding it (for example, an alternative entrance or dedicated parking)

If we have a legal duty to make reasonable adjustments, we cannot charge the person any costs of us keeping to that duty. We are committed to providing a high standard of accessibility to our services and we will therefore ensure our approach takes account of all tenants with disabilities.

We will let tenants know that we can make reasonable adjustments; we will do this by:

- Including a paragraph in written communications such as letters
- Asking you whether you might need a reasonable adjustment
- Including a note on our published documents to say that we can provide the document in an alternative format, and
- Publishing this policy on our website

You can ask us for a reasonable adjustment by:

- Sending us a letter or email to explain what adjustment you need and why you need it
- Contacting us online through our website
- Phoning our Customer Service Centre.

A family member, friend or representative can ask for an adjustment for you, if you have given us permission to deal with them. A member of council staff may suggest an adjustment if they know it will help you. In most cases we can agree to and make the necessary adjustment without delay. However, in some cases we may need to consider in more detail how best to overcome the difficulty you are having or get advice from disability organisations.

We may need medical evidence, for example to identify the effect or disadvantage that we need to tackle or to confirm that a particular adjustment would be effective. We would pay any costs involved in getting this information.

5. Types of Reasonable Adjustments We Can Offer

The Council has no set list of reasonable adjustments; the adjustments we can provide depend on your needs. We will discuss your needs with you and try to agree what may be reasonable in the circumstances. We will not make assumptions without talking to you.

What is deemed as reasonable can depend on a number of factors including:

- The disadvantage caused
- What difference the adjustment would make
- If the adjustment is what is needed to make the difference or if it is more than is necessary

- What will put you in the same position as others using the service
- The cost of the adjustment

What is unreasonable in one situation might be reasonable for someone else. If we cannot make a reasonable adjustment due to cost or resources, we will work with you to find the most appropriate alternative solution.

Examples of adjustments that we can make include:

- Providing information in alternative formats (for example, in large print or Braille, as an audio file, or on coloured paper)
- Providing a sign language interpreter for deaf people who use British Sign Language (BSL) if it is necessary to communicate face to face
- Giving you more time to do something (if this is allowed by law)
- Adapting our communication method, for example if email or phone is preferred to hard copy letter
- Taking extra time and adapting communication methods, such as using visual aids, where a person has a learning disability
- Dealing with a family member, friend or representative (if you have given us permission to do so)
- Providing breaks in meetings

Examples of adjustments to physical features includes

- The design or construction of a building
- An approach to, exit from or access to a building
- A fixture or fitting, furniture, furnishings, materials, equipment and so on in or on the premises
- Any other physical structure, item or quality

Our premises will be accessible to people through

- Making sure that our public office reception services are accessible to wheelchair users and have induction loops wherever possible
- Making sure that people with mobility needs, including wheelchair users, are able to attend residents meetings and that the selected venues also have accessible toilet facilities.

6. Legislation & Regulation

Public Sector Equality Duty and The Equality Act 2010 provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. That act requires us to provide reasonable adjustments in the provision of services to those who have “a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to- day activities.”

Under the Act, we have a legal duty to make reasonable adjustments in three circumstances:

- Where there is a provision, criterion or practice which puts a person with a disability at a substantial disadvantage in relation to a relevant matter in comparison with persons who do not have disabilities
- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons who do not have disabilities
- Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial* disadvantage in comparison with persons who do not have disabilities.

The Regulator of Social Housing's Tenant Involvement and Empowerment Standard requires us to provide choices, information and communication that are appropriate to the diverse needs of our customers, and to treat customers with fairness and respect.

The Housing Ombudsman's Complaint Handling Code requires us to have in place a reasonable adjustments policy that covers how we may adapt normal policies, procedures, or processes to accommodate an individual's needs.

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

7. Legal Framework

Equality Act 2010 (including section 149, Public Sector Equality Duty)

Mental Capacity Act 2005

Housing Grants, Construction & Regeneration Act 1996

8. Policy Outcomes

By successfully implementing this policy it will enable an efficient and effective repairs service that maintains the properties we let as a decent place to live.

9. Monitoring and Review

In order to ensure that the policy is effective and delivering the intended impact, it will be monitored using Key Performance Indicator's (KPI's) in line with Guildford Borough Council's Policy Framework.

Furthermore, in line with the Guildford Borough Council's Policy Framework, this policy is scheduled to be reviewed every 3 years, unless due to a change in Government legislation or regulatory requirements, the review period will be brought forward to ensure compliance.

Input and approval will be sought from our residents (via the Tenants Group) prior to making any substantive changes.

10. Reviews and Complaints

Any individual who is dissatisfied with the service experienced should be encouraged to provide feedback. Complaints regarding the implementation of this policy will be dealt with in accordance with the Council's corporate Customer Complaints Policy and associated procedure.

11. Equality and Diversity

GBC is committed to equal and fair treatment of all sections of the community. Accordingly, no person will be discriminated against during the implementation of this policy on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

We are committed to helping customers to access information about their homes and services in a way that suits individual needs.

The council aims to provide homes and services that meet the diverse needs of customers. We believe that all customers should be able to access housing, support, and care services with the same ease and that the quality of our service is the same high standard for all.

In delivering this policy, GBC Housing's staff will comply fully with the requirements of the Council's Equalities and Human Rights Policy.

In order to comply with the Equality Act 2010, an equality impact analysis (EIA) was completed as part of the policy review. The legal framework for the Council's approach is provided by the Equality Act 2010 including the Public Sector Equality Duty (section 149, Equality Act 2010) under which a public authority must have

regard to the need to try to eliminate discrimination, harassment, victimisation and to advance equality of opportunity and foster good relations between people with differing characteristics.

12. Data Protection and Retention of Information

All information will be handled in accordance with the requirements of General Data Protection Regulations and the Data Protection Act 2018. The handling and storage of personal data will be managed and stored in accordance with our Data Protection Policy and our Record Retention Disposal Schedule.