

Reasonable Adjustments Policy

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| Effective from | 31 December 2020 |
| Date approved | December 2020 |
| Approved by | Triathlon Homes Board |
| Planned review date | December 2023 |
| Version | 1.1 |
| Responsible officer | Head of Operations (Triathlon Homes) (Responsibility for proposing final draft, implementation and review) |
| Author | Customer Services Policy Consultant |

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1. Background

- 1.1 This policy has been written in accordance with the Housing Ombudsman Service's Complaints Handling Code and our commitments under the Equality Act 2010.
- 1.2 The Regulator of Social Housing's Tenant Involvement and Empowerment Standard, requires us to "provide choices, information and communication that is appropriate to the diverse needs of (our) tenants" and to "demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs."

2. Policy statement

- 2.1 Here at Triathlon Homes LLP we are committed to making sure our services can be easily accessed by customers with disabilities and/or additional needs.
- 2.2 This policy does not aim to explain how we will approach every circumstance where a customer with disabilities requires a service to be adjusted. It is a general statement of our commitment to ensure customers with disabilities are not at a disadvantage when accessing our services.
- 2.3 The policy defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.
- 2.4 Many of the adjustments we offer to our services can also be made available to our customers without disabilities.
- 2.5 As part of our Equality, Diversity and Inclusion Strategy, all staff receive training that is specifically aimed at promoting diversity and addressing barriers that individuals from protected groups (including disability) may face when accessing our services.
- 2.6 The policy applies to all Triathlon Homes LLP customers.
- 2.7 Any reference to 'we', 'our' or 'us' refers to Triathlon Homes LLP.

3. The Equality Act 2010

- 3.1 Under the Equality Act 2010 (The Act) a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to carry out normal day-to-day activities.
- 3.2 The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.
- 3.3 Under the Act, we have a legal duty to make adjustments in the following 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 are not disabled;

- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons 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 persons who are not disabled.

4. What is a reasonable adjustment?

- 4.1 A reasonable adjustment may be a physical alteration to one of our premises, for example, fitting a lift, wide doors or a ramp.
- 4.2 It may also be a change to one of our policies, procedures or services, for example, a comfort or rest break in a meeting or an extension of time limits (where lawful to do so).
- 4.3 We will adjust how we communicate with our customers in order to meet their specific needs. For example, providing information in alternative formats or a sign language interpreter at workshops and events.
- 4.4 In all circumstances, the reasonable adjustment is being made to ensure all of our services can be equally accessed by customers with disabilities, as well as those without.

5. How to request a reasonable adjustment

- 5.1 A reasonable adjustment can be requested from us in the following ways:
- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email;
 - By telephoning our Customer Service Centre;
 - By referral from a local authority or other relevant agency;
 - By a family member when we have been given permission for them to do so; and or
 - A member of staff may suggest for one to be made, when they are aware it will support the customer's needs.
- 5.2 In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail how best to overcome the difficulty a customer with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support.

6. How do we define 'reasonable'?

- 6.1 The Equality and Human Rights Commission suggests the following considerations when we decide whether an adjustment is 'reasonable' or not:
- How effective 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 making the adjustment(s);
- The cost of the adjustment(s) and whether this is possible within our resources; and
- Any disruption to the service that making the adjustment(s) may cause.

6.2 In the circumstance where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the customer to find the most appropriate alternative solution for them.

7. Keeping record of a customer's needs

- 7.1 At the beginning of a customer's tenancy, they will be asked whether they have any support needs and/or any communication preferences.
- 7.2 These will be recorded onto our internal systems and will be used in order to meet the customer's specific needs throughout the duration of their tenancy.
- 7.3 We will proactively check that we have the appropriate support flags and communication preferences recorded on our systems, where information is missing or requires updating.

8. Reasonable adjustments to our complaints process

- 8.1 We will make reasonable adjustments to our complaints service where necessary, ensuring customers with a disability are not at a disadvantage when accessing the service.
- 8.2 Examples of the reasonable adjustments we will make are:
- Using the customer's communication preference throughout the duration of the complaint;
 - We will not request a complaint to be made in writing where this presents a barrier or disadvantage to the customer due to their disability or additional needs;
 - Extension of any time limits (where it is lawful to do so); and
 - Provide information in alternative formats eg. Braille, large print or on coloured paper.

9. Website

- 9.1 Our website is compliant with the World Wide Web Consortium (W3C) standards. The Web Content Accessibility Guidelines (WCAG) is a global technical standard from W3C, which means our website has met a set of goals to make sure its content can be easily accessed by customers with a disability or additional needs.
- 9.2 Additionally, we have installed assistive technology to our website called Browsealoud, which works across all common browsers and platforms. Browsealoud has many features to help improve accessibility for customer, including:

- An audio feature, which reads text aloud;
- Options to change the audio speed and voice to suit the customer; and
- A simplify mode, which removes distracting content.

10. Equality Impact Assessments

10.1 We complete an equality impact assessment each time we develop or review a policy, procedure or service. The assessment is to help us make sure our decision making is fair and does not present any barriers or disadvantage to customers from any protected group (including disability) under the Equality Act 2010.

11. Appeals

11.1 If a customer is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.

11.2 If necessary when reviewing our decision, we will seek advice from specific expert disability groups.

12. Related policies

- Equality, Diversity and Inclusion Policy
- Aids and Adaptations Policy

Policy Controls sheet

| Author | Date | Main changes and why (i.e. change in legislation, change in internal processes) |
|-------------------------------------|---------------|--|
| Customer Services Policy Manager | May 2021 | Move to new template. Correct errors in contents section. |
| Customer Services Policy Consultant | December 2020 | New policy. Supersedes the Priority Needs Policy. |