



Reasonable Adjustments Policy

9 December 2020

In this policy you are our tenant if you pay your rent to us on a weekly or shared ownership basis. If you pay your rent to another housing association you are not our tenant.

We do not want anyone who lives in a property we own to have any problems. We are willing to help put anything right where we are in a position to do so. If you have a problem with a property that we own and let us know we will respond, so far as we can, in accordance with this policy and let you know what we are doing and why.

This document is available in alternative format, for example easy-read, on request.

1. Introduction

- 1.1 As a provider of good quality homes and services, Funding Affordable Homes Housing Association Limited (**FAHHA**) is committed to ensuring that disabled people are not disadvantaged in accessing its services. To this end, we will make reasonable adjustments for disabled people.
- 1.2 This policy does not seek to explain how we will approach every situation but is intended to set out a general statement of our policy confirming our commitment to improving accessibility for everybody that we deal with; setting out some of the basic principles of our commitment to provide reasonable adjustments for disabled people and setting out the factors that we will take into account in dealing with requests for reasonable adjustments.

2. Scope

This policy applies to our tenants. By tenants we mean people who have a lease, tenancy, licence or other arrangement to occupy premises directly owned and managed by us, who pay their rent to us on a weekly or shared ownership basis.

3. The Equality Act 2010

- 3.1 The Equality Act 2010 (the Act) sets out the legal provisions that apply to protect the rights of individuals and to advance equality of opportunity for all.
- 3.2 Under the Act the legal duty to make reasonable adjustments arises in three circumstances:
 - 3.2.1 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.
 - 3.2.2 Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
 - 3.2.3 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.
- 3.3 The Act defines substantial disadvantage as "more than minor or trivial".
- 3.4 The Act does not define what is "reasonable" but guidance from the Equality and Human Rights Commission suggests that the most relevant factors are:
 - 3.4.1 The effectiveness of adjustments in preventing or reducing the disadvantage for the disabled person.
 - 3.4.2 The practicality of making the adjustment.
 - 3.4.3 The availability of resources including external assistance and finance.
 - 3.4.4 Any disruption to the service that making the adjustment may cause. Examples of this may be by allowing more time than we would usually allow for someone to provide information that we need or by providing information in an accessible format for example larger font than usual.

4. Policy

- 4.1 We will make our customers aware that reasonable adjustments can be provided when dealing with complaints by publishing this policy and the complaints policy; by including a note on the complaints policy and procedure indicating that these documents can be provided in an alternative format on request; by regularly advising customers of the policy in our annual report and any other communication we may have with them such as by newsletters.
- 4.2 There is no prescribed list of reasonable adjustments. Reasonable adjustments depend on the individual's needs. FAHHA will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances. Some examples of adjustments that can be made include: provision of auxiliary aids; provision of information in appropriate alternative formats (e.g. 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; use of plain English or easy-read service; communication through a representative or intermediary and rest or comfort breaks in any meetings.
- 4.3 Upon request, we will consider the reasonable adjustment required and will seek to respond with the minimum delay. However, in some circumstances 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. In these circumstances we will let the customer know an indication of a revised timescale and any impact this may have on timeframes for dealing with the complaint.
- 4.4 We will record and monitor the reasonable adjustments that have been requested and made.

5. Legal and Regulatory Framework

- Housing Ombudsman's Complaint Handling Code July 2020
- Regulator of Social Housing's (RSH) regulatory framework
- RSH Transparency, Influence and Accountability Standard

6. Related Policies

- Complaints Policy
- Unacceptable Behaviour Policy

7. Related Procedures

Complaints Procedure

Date of Board approval	Date of Review
09.12.20	08.03.23