



**Reasonable Adjustments Policy**

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<b>Contact Officer:</b>	Customer First Learning Specialist / Director of Customers
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<b>Formal Review of Policy by:</b>	Executive Management Team / Corporate Management Team
<b>Policy Links:</b>	Equality and Diversity Policy Complaints Policy Limited Contact Policy Code of Conduct

**Brief Policy Summary:**

This policy sets out how Lincolnshire Housing Partnership will achieve its aims to promote equality and diversity as an employer and a housing provider, making reasonable adjustments to ensure that all staff can work effectively and that services are delivered equitably regardless of the nine protected characteristics, focussing on individual need.

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### 1. Purpose

- 1.1 Lincolnshire Housing Partnership (LHP) recognises that its customers and staff come from diverse backgrounds and have varying experiences and different needs. LHP are committed to ensuring that equality and diversity is embedded into our day to day working practices and actively promotes fairness, respect, equality, diversity, inclusion and engagement and is further committed to continuous improvement.
- 1.2 Through our policies and in our day to day activities, along with the fulfilment of our legal responsibilities, LHP is committed to promoting equality and fairness and adjusting how services are delivered in order to combat discrimination.

### 2. Objectives

- 2.1 LHP is committed to ensuring that disabled people are not disadvantaged in accessing our services. We will therefore make reasonable adjustments for disabled people.
- 2.2 This policy does not seek to explain how LHP will approach every situation, it is intended as a general statement of our policy and;
  - Confirms our commitment to improving accessibility for everybody that we deal with or comes into contact with us
  - Sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people
  - Sets out the factors that we will take into account in dealing with requests for reasonable adjustments.
- 2.3 Many of the arrangements that we offer for disabled people can also be made available for those who do not have disabilities. For example, provision of documents in larger font than our usual font.
- 2.4 This policy applies to all LHP staff and customers.

### 3. The Equality Act 2010

- 3.1 The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. Although not specifically listed as a public body under the Act, as an employer, and as a provider of services to the public and other public bodies LHP commits to comply with the provisions for public bodies under the Act.

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3.2 Under the Act the legal duty to make reasonable adjustments arises in three circumstances:

- 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.
- Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- 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 Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.

### **4. What is a reasonable adjustment?**

4.1 To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability.

Examples of this might include:

- Allowing more time than we would usually for someone to provide information that we need; or
- Providing specialist equipment or additional support such as a hearing loop, sign language or interpreter for a meeting.

### **5. Requesting reasonable adjustments**

5.1 We will let people know that we can provide reasonable adjustments in the following ways:

- By including a paragraph in written communications (e.g. acknowledgement letters);
- By asking whether a reasonable adjustment might be required over the telephone;
- Within our published documents advising that we can provide the documents in an alternative format when asked;

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- By publishing our policy on our website; and
- By working with our Customer Scrutiny Panel, our Service Improvement Panels and through staff consultation mechanisms to raise awareness of this policy.

### **6. Types of reasonable adjustment we can offer**

6.1 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.

6.2 Some examples of the adjustments that could be made can include:

- provision of auxiliary aids;
- provision of information in appropriate alternative formats (e.g. large print, Braille, translation, coloured paper, telephone explanation) in addition to the legally required format where this is a requirement;
- extension of time limits for example to provide information (where it is lawful to do so);
- use of email or telephone in addition to hard copy letters;
- use of plain English or Easy Read service;
- communication through a representative or intermediary; and/or
- rest or comfort breaks in meetings.

### **7 LHP's response to requests for reasonable adjustments**

7.1 In the majority of cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay.

7.2 In some cases, 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 including Access to Work, to assist with signposting and other forms of support.

### **8 How does LHP decide what is reasonable?**

8.1 The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission suggests that the most relevant factors are:

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- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person;
- The practicality of our making the adjustments; and
- The availability of LHP's resources including external assistance and finance.

8.2 The adjustment should be designed to fully address the disadvantage it is meant to overcome. E.G. providing an audio version of documents may not properly overcome the barriers faced by the disabled person if there are other requirements that need to be overcome, for example the customer also has a hearing impairment.

8.3 It may not be possible for LHP to provide additional time to customers if there are legislative deadlines to meet.

8.4 For an adjustment to be reasonable, it should be effective.

8.5 It is important to remember that an adjustment which is deemed effective, may not be considered reasonable. E.g. resourcing is not just about the cost; it may involve other elements for example recruiting additional staff with specific skills. If an adjustment costs a significant amount, it is more likely to be reasonable to make the adjustment and deliver this if the organisation has substantial financial resources.

8.6 The reasonableness of an adjustment will be evaluated against the resources available to LHP. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

8.7 In changing policies, criteria or practices we are not required to change the basic nature of the service offered.

### **9.0 Potential Disruption to LHP's activities**

9.1 It would not usually be reasonable for an Anti-Social Behaviour Officer to cease work on all other cases and concentrate all their time to one case as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

## **10 Monitoring**

10.1 We will record and monitor the reasonable adjustments through the personnel data base and tenancy records that have been requested and made, allowing 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.

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### **11 Addressing complaints about our service**

- 11.1 We are committed to providing a high standard of service, dealing with staff and customers in a way that is fair and free from discrimination.
- 11.2 If anyone is dissatisfied with the arrangements, we have made for providing reasonable adjustments, we will respond using our complaints policy.
- 11.3 If necessary and appropriate when reviewing our decision, we may take advice from specific expert disability groups or seek legal advice.

### **12 Review**

- 12.1 This policy will be reviewed every three years, or when legislation or best practice guidance is updated.

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### Equality Impact Assessment Initial Screening

Name of policy / strategy / project (the "initiative"):

Reasonable Adjustments Policy

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

This policy sets out how Lincolnshire Housing Partnership will achieve its aims to promote equality and diversity as an employer and a housing provider, making reasonable adjustments to ensure that all staff can work effectively and that services are delivered fairly

Completed by: Bridget Lloyd

Date: 18.8.20

#### STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is "equality neutral" (i.e. have no effect either positive or negative).

**Q 1. Who will benefit from this initiative?** Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality 'neutral' i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

Everyone who comes into contact with LHP will benefit from this policy with those staff and customers who have a disability being most positively impacted.



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**Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality**

No

**Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality**

This policy is targeted at all our customers and staff and we hold appropriate E&D information on both client groups.

**Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality**

Wholly provided internally by LHP

**Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality**

Whilst we do not believe that a full impact assessment is required, we will monitor the policy impact over the first year of operation and review the position

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**Q 6. To be completed at six monthly review** Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data. Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Guidelines: Things to consider

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation, it must be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so, can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.