

London Borough of Tower Hamlets

Reasonable Adjustments Policy

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| Policy |
| LBTH is committed to ensuring that disabled people are not disadvantaged when accessing our services. This policy has been written in accordance with the Housing Ombudsman Service’s Complaint Handling Code and our commitments under the Equality Act 2010. |
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Regulatory Standards, Legislation and Codes of practice

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| Regulator: | The Regulator for Social Housing’s framework and standards - Transparency, Influence & Accountability Standard |
| Legislation: | Social Housing (Regulation) Act 2023  Equality Act 2010 |
| Codes of practice: | Housing Ombudsman Complaints Handling Code  Public Sector Equality Duty |
| The policy also operates in the context of: | Complaints Policy  Redress Policy |

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# Purpose

London Borough of Tower Hamlets (LBTH) is committed to ensuring that disabled people are not disadvantaged when accessing our services. This policy has been written in accordance with the Housing Ombudsman Service’s Complaint Handling Code and our commitments under the Equality Act 2010.

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 tenants’ and ‘demonstrate that (we) understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs’.

This policy does not aim to explain how we will approach every situation. It is intended as a general statement of our commitment to improving accessibility for all our customers and confirms the following:

* Definition of what a ‘reasonable adjustment’ is
* Sets out the principles of our commitment to provide reasonable adjustments for customers who require them
* Reasonable adjustments to our complaints process
* Explains how customers can appeal if they do not agree with LBTH’s decision relating to their circumstances.

Many of the adjustments we offer to our services can also be made available to our customers without disabilities.

# Equality Act 2010

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.

The Act provides a legislative framework to protect the rights of individuals and to advance opportunity for all. As a provider of public services, LBTH has a legal duty to make adjustments in the following three areas:

* When changing a policy, procedure, or practice
* Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons who are not disabled
* Where a person with a disability, without the provision of an additional aid or service, be put at a substantial disadvantage in comparison with persons who are not disabled.

# What is a reasonable adjustment?

Reasonable adjustments are changes that organisations and people providing services or public functions must make for you if your disability puts you at a disadvantage compared with others who are not disabled.

A reasonable adjustment may be a physical alteration to one of our premises, for example, fitting a lift or a ramp. It is not possible to produce an exhaustive list of reasonable adjustments since this can only be determined in relation to a specific set of circumstances.

The Equality Act’s Code of Practice suggests the following considerations when we decide whether an adjustment is ‘reasonable’ or not:

* How effective the adjustment(s) will be in assisting with a customer with a disability and in preventing or reducing the possibility of them being at a disadvantage
* The practicability of the adjustment(s)
* The cost (financial and other) of the adjustment(s) and whether this is possible within LBTH resources; and
* Any disruption to the service that making the adjustment(s) may cause.

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

## 3.1 Adjustments that will be considered

LBTH will make reasonable adjustments to our complaints service where necessary to ensure customers with a disability are not at a disadvantage when accessing the service.

Examples of the reasonable adjustments we will make are:

* Extension of any time limits (where it is lawful to do so)
* Provide information in alternative formats, for example, large print, Braille or on coloured paper
* Using the customer’s communication preference throughout the duration of the complaint
* Dealing with a family member or representative (if you have given us permission to do so).

In some instances, we may provide reasonable adjustments for customers who do not have a disability but may have a special need or circumstance. Examples are:

* Providing translation or interpreting services for customers whose first language is not English
* Providing additional support for customers with literacy problems.

# Equality impact assessments

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 barrier or disadvantage to any customer from a protected group under the Equality Act 2010.

# Appeals

If a customer is dissatisfied with the arrangements or decisions made by LBTH in relation to a reasonable adjustment, they can appeal by visiting the ‘Compliments, comments and complaints’ section on our website which provides more detail.

# Review

We will review this policy every two years, when necessary for business reasons, and whenever there are changes to legislation, regulations, or best practice.