

Reasonable Adjustment Policy

Date: September 2024

Department: Communities Group

Next Review: September 2027

Accessibility of Document

Our aim is to make our services easy to use and accessible for everyone. We will take steps to make any reasonable adjustments needed for you to contact us, access our policies, or any requests to provide responses in other formats. Depending on the individual's needs, these might include but is not limited to:

- Using larger print, or a specific colour contrast
- Having an 'easy read' version of the document
- Having a translation of the document
- Having the document in Braille format

If you would like to contact us about having a copy of this document, or in alternative formats, please call us on 01223 457000, or write to us at Cambridge City Council, PO Box 700, Cambridge CB1 0JH.

1. Introduction

This policy has been written in accordance with the Equality Act 2010 as well as the Housing Ombudsman Service's Complaints Handling Code and the Regulator of Social Housing's revised Consumer Standards. In line with the Transparency, Influence and Accountability and Tenancy Standard, we need 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'.

We are committed to making sure that people are not disadvantaged when getting access to or using our services. For this reason, we will make 'reasonable adjustments' for people with disabilities and those with additional needs.

2. Scope

This policy applies to all current and future tenants and leaseholders of Cambridge City Council, and those who may be acting on their behalf as a representative.

Where it refers to 'residents' or 'tenants', this includes both tenants and leaseholders.

3. Purpose:

The purpose of the policy is to ensure that Cambridge City Council recognises, responds and records residents' vulnerabilities and disabilities, to understand better when their need becomes a right and that we will record all vulnerabilities and disabilities at the point that the resident discloses them to us.

This policy provides a general framework and does not explain how we will approach every situation, it is a statement of intent and:

- confirms our commitment to improving resident's access to our services, ensuring our services are inclusive for everybody,
- defines what a reasonable adjustment is, when and how we will make them, and how you can ask for them, and
- what we will consider when dealing with requests for reasonable adjustments.

Many of the arrangements we offer for those with disabilities (for example, providing documents in large print) can also be made available residents who do not have disabilities.

4. Definitions

- 4.1. Disability:** Under the Equality Act 2010, a person is considered to have a disability if they 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.
- 4.2. Vulnerability:** The Housing Ombudsman Service defines vulnerability as "A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced."

- 4.3. Reasonable Adjustment:** A 'reasonable adjustment' is a legal term defined by the Equality Act 2010: 'To make an adjustment to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability'.

5. Legislation and Regulations

The legislation, regulations and codes of practice listed below will be taken into consideration when implementing this policy:

- Social Housing (Regulation) Act 2023
- The Housing Ombudsman's Code of Practice
- The Care Act 2014
- The Equality Act 2010
- The Human Rights Act 1998

6. Related Policies and Procedures (or Documents)

- [Complaints Policy](#)

7. Our Responsibilities

The Equality Act 2010

The Equality Act 2010 (the Act) protects people's rights and aims to provide equal opportunities for everyone.

- 7.1.** Under the Act, we must make reasonable adjustments in the following three circumstances:
- If there is a policy, practice or procedure which disadvantages a disabled person significantly more than a person who is not disabled.
 - If a physical feature disadvantages a disabled person significantly more than a person who is not disabled.
 - If a disabled person without any aids, adaptations or support service would be disadvantaged significantly more than a person who is not disabled.
- 7.2.** If the circumstance relates to providing information, the steps it is 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).

7.3. In relation to physical features, the steps it is 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).

7.4. A physical feature 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, or
- any other physical structure, item or quality.

7.5. If we have a legal duty to make reasonable adjustments, we cannot charge you any costs of us keeping to that duty.

7.6. We are committed to providing a high standard of accessibility to our services. We will therefore make sure our approach takes account of all people with disabilities.

8. Reasonable Adjustments

8.1. What is a Reasonable Adjustment?

8.1.1. We use the definition of a disability set out in the Equality Act 2010. The Equality Act covers some impairments automatically, even if you have no symptoms. The term disability includes hidden disabilities. These are disabilities with no physical signs and include learning difficulties and mental health conditions.

8.1.2. Examples of such changes include:

- allowing more time than usual for the customer to provide information that we need
- using the preferred type of communication specified by the customer (for example, email or letter)
- providing specialist equipment or extra support such as a sign-language interpreter.

8.1.3. When carrying out our role as a landlord we will always consider beforehand what we can do to make sure disabled residents are not disadvantaged.

8.2. Asking for Reasonable Adjustments:

8.2.1. We will let residents 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.

8.2.2. 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, our address is Cambridge City Council, PO Box 700, Cambridge CB1 0JH
- contacting us online through our website www.cambridge.gov.uk/contact-us, or
- phoning our Customer Service Centre on 01223 457000.

8.2.3. 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.

8.2.4. We will request information to help us understand how we can best support by asking:

- what you would like to share with us about yourself, for example, that you have a disability, are neurodivergent or have a vulnerability
- if you require support understanding the information we provide
- what you would like us to take into account when communicating with you
- what you would like us to do differently, whilst we take a proactive approach by providing options and suggestions of how we can adjust our services and linking it to what has been shared with us.

8.2.5. We will treat all conversations with sensitivity, confidentiality and on a case-by-case basis. We will listen to a resident's needs and make every effort to meet requests for adjustments when it's reasonable to do so. Where we are unable to meet a request, we will explain why. 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.

8.3. Types of Reasonable Adjustments we can offer:

8.3.1. There is 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.

8.3.2. What is 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, and
- the cost of the adjustment.

8.3.3. 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.

8.3.4. 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)
- giving you more time to do something (if this is allowed by law)
- communicating with you by email or phone instead of by letter,
- dealing with a family member, friend or representative (if you have given us permission to do so), and
- providing breaks in meetings.

8.3.5. In some instances, we may provide reasonable adjustments for residents who are not disabled but may have a special need. Although it is not possible to list all such circumstances, examples are:

- providing translation services or interpreters for customers whose first language is not English, and
- providing extra support for customers with literacy problems.

8.4. Reasonable Adjustments to our Complaints Process:

If necessary, we will make reasonable adjustments to our complaints process in order to provide equal access. Examples of the reasonable adjustments we can make if you need help making a complaint are as follows:

- You can appoint a family member or friend to act on your behalf, or we can help you find a representative.
- A family member, friend or representative can attend meetings with you.

8.5. Appeals:

If you are not satisfied with the arrangements or decision we have made about a reasonable adjustment, we will respond in line with our complaints policy. When we review our decision, we may get advice from disability groups or get legal advice.

9. Monitoring or Education and Training

Equality Impact Assessments: We carry out an equality impact assessment each time we develop or review a policy, procedure of service. The assessment is to help us make sure our decisions are fair and do not disadvantage any disabled person.

We will review this policy every three years in line with our standard review cycle, when necessary for business reasons, or whenever there are changes to laws, regulations, or best practice.

Notes

Updates

Date

section xxx added/modified/removed

on

Date