

SP52 Reasonable Adjustments for Residents Policy



Scope of policy

1.1 As a community mutual housing association, Soha is committed to providing an equitable service to all residents, ensuring residents with disabilities, neurodivergence and health conditions, are not disadvantaged when accessing our services and making complaints. One of our cultural principles is 'Residents First', and this policy describes our approach to making reasonable adjustments to our services based on residents' circumstances, including residents with disabilities and support needs, such as visual impairments, mobility issues, neurodivergence and cognitive disabilities.

1.2 This policy does not intend to describe how we will approach every situation but describes the basic principles by which we will make reasonable adjustments for residents, and the factors that we will consider when evaluating requests.

Aim

2.1 This policy aims to ensure that:

- Residents with disabilities and/or support needs can access our services, as far as reasonably possible, in the same way non-residents with disabilities do
- Soha staff understand our duty to make reasonable adjustments
- Our colleagues understand the types of adjustments they can make when delivering services to residents with disabilities, health conditions and neurodivergence
- We meet our legal requirements under the Equality Act 2010 by making reasonable adjustments where needed to prevent disadvantage and discrimination
- We are conscious of adjustments that residents with disabilities, health conditions and neurodivergence may require, without making assumptions about individual residents' situation
- We live up to our cultural principles, particularly treating all residents with dignity and respect, ensuring that reasonable adjustments are made in a way that makes them feel valued and supported, without making assumptions about residents' needs
- We maintain accurate records of residents' vulnerabilities and individual circumstances, ensuring temporary, as well as permanent, vulnerabilities are recognised, recorded and then removed from records once no longer appropriate

2.2 This policy has links to some of our other policies, and we've thought about these links when reviewing the policy. This policy should be read alongside the:

- Complaints Policy
- Aids & Adaptations Policy
- Aids and Adaptations Procedure
- Equality, Diversity and Inclusion Policy

Key terms and definitions

3.1 A reasonable adjustment involves making a change to the way we usually do things to make sure that our services are accessible and we are fair to all our Residents.

3.2 These adjustments might include:

- adjusting **how we communicate** with residents to meet their specific needs
- **allowing more time** than we would usually for someone to provide information that we needed
- **prioritising residents in certain circumstances, such as prioritising** residents at greater risk due to a disability
- **providing specialist equipment** or **additional support**, such as a sign language interpreter for a workshop or event

3.3 As an organisation, we tend not to use the term ‘vulnerable’ to describe residents. Instead, we want to understand the specific disabilities and circumstances residents live with to better understand the challenges individuals they may face, as well as the contribution they have to make.

Our approach

How we decide if an adjustment is ‘reasonable’

4.1 When considering whether an adjustment is reasonable, we will consider:

- What the disadvantage would be if the adjustment was not made
- The effectiveness of the adjustment in preventing or reducing the disadvantage for the person. The adjustment should be designed to address the disadvantage as far as possible
- The practicality of us making the adjustment
- The availability of our resources including external assistance and finance
- Any disruption to the service that making the adjustment may cause.

4.2 When providing a specific adjustment for an individual resident, we’ll discuss and confirm this with the resident or their representative to avoid making incorrect assumptions about a person’s needs. In cases where we can’t meet a resident’s preferred adjustment, we’ll work with them to find the best solution.

Some reasonable adjustments are time-specific – for example, a physical disability which may improve following treatment or an operation. When this is a case, we may look to review the reasonable adjustment as the situation changes.

We will not charge for reasonable adjustments.

Reasonable Adjustments for Residents Policy, March 2025

How residents can request reasonable adjustments

4.3 Residents can request a reasonable adjustment by communicating with any colleague. An adjustment can be requested via any means, including in-person conversations with staff, in writing, online, or on the phone, so the service is accessible to all.

4.4 We will clearly communicate on our website and in written and verbal communications that we can make reasonable adjustments for residents. When providing services to residents, we will ask them if they require any adjustments to make the service accessible.

Examples of reasonable adjustments we offer

4.5 The adjustments we will make will vary depending on the needs of the resident and the situation. It's not possible to provide a list of every reasonable adjustment but some common adjustments might be:

- Providing information in alternative formats, for example in large print or Braille, as an audio file, or on coloured paper
- Giving residents more time to do something, if allowed by law. For example, we can be flexible with timescales we have set ourselves, such as asking residents to contact us within a certain amount of time to make a request or respond to something
- Adapting our communication method, for example if email or phone is preferred to hard copy letter
- Providing a sign language interpreter for deaf residents who use British Sign Language (BSL) if it is necessary to communicate face-to-face
- Providing extra breaks in meetings

4.6 Our office and locations for other resident gatherings will be accessible to residents through:

- Making sure that our office is accessible to wheelchair users and have induction loops wherever possible
- Making sure that residents with mobility needs, including wheelchair users, are able to attend residents meetings and that the selected venues also have accessible toilet facilities

Examples of requests we are unlikely to be able to meet

4.7 Examples of requests we are unlikely to be able to meet are:

- Requests which are at odds with legislation we are bound by, such as if a resident wants to ask for a review after receiving a notice of seeking possession, requesting delays to gas safety checks, or seeking dispensation on statutory health and safety requirements (for example, storing items in corridors)
- Requests where the cost involved is excessive, or where a lower cost option would be a reasonable adjustment, such as requests to print off large volumes of documents which are available on our website

Reasonable Adjustments for Residents Policy, March 2025

- Requests to prioritize service, where there is no direct link between the presenting issue and a resident's diagnosed condition, such as fast-tracking repairs where there is no immediate risk of harm or where the resident was not unduly disadvantaged
- Requests which require professional judgements about need which our staff would not reasonably be expected to make a judgement – including matters where health professionals are better placed and have statutory responsibility to exercise judgement. Staff have a broad range of knowledge and skills around residents' needs, however they are not typically trained medical professionals. In order to serve residents well and ensure high quality decision-making, we will work closely with statutory bodies and qualified professionals, without straying beyond our areas of expertise.

Legislation and Regulation

5.1 The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. As the Equalities Impact Assessment makes clear, all protected characteristics have been taken into account in the drafting of this policy. The policy itself focusses on the characteristics where reasonable adjustments are most likely to be required – namely, age, disability, pregnancy and race.

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

- a) 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.
- b) Where a **physical feature** puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- c) 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.

5.3 That act requires us to provide reasonable adjustments in the provision of services to those who 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.”

5.4 The duty is ‘anticipatory’ to people with disabilities in general as well as to individuals, so we must think in advance and anticipate what people with disabilities might reasonably need.

5.5 Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as ‘more than minor or trivial’.

5.6 The Housing Ombudsman's Complaint Handling Code requires us to have in place a reasonable adjustments policy that covers how we may adapt normal policies, procedures, or processes to accommodate an individual's needs.

Appeals and Complaints

6.1 Any appeals or complaints received relating to this service will be dealt with in line with Soha's complaints policy.

Resident Involvement

7.1 This policy has been reviewed and approved by our Disability Awareness and Action Group, Resident Sounding Board and Members Forum. We will continue to use any resident feedback on the reasonable adjustment process to improve the policy over time.

Responsibility

8.1 The Director of Housing and Communities has overall accountability for this policy and implementation.

8.2 All colleagues have a responsibility to follow the principles of this policy and take personal accountability for their own approach.

8.3 We will provide ongoing training for staff to ensure that they are equipped to fulfil these responsibilities.

Monitoring and review

9.1 This policy area will be monitored and reviewed by the EDI and Complaints working groups – monitoring outcomes for residents with disabilities and reviewing any complaints that come in concerning the experience of residents with disabilities.

The policy will be reviewed every three years unless there are changes to regulation which requires an earlier review.

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