

The Trust

Reasonable Adjustments Policy

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TABLE OF CONTENTS

1.	INTRODUCTION	2
2.	SCOPE	2
3.	LEGAL AND REGULATORY REQUIREMENTS	2
4.	DEFINITIONS	2
	What is a Reasonable Adjustment?	2
5.	OUR POLICY	3
	Deciding what is reasonable	3
	How we will record customers' needs	3
	How can customers request a Reasonable Adjustment?	4
	Reasonable adjustments to our complaints process	4
	Appealing a decision	4
6.	EQUALITY, DIVERSITY & INCLUSION	4
6. 7.	EQUALITY, DIVERSITY & INCLUSION	
-		4
-	RESPONSIBILITIES	4 4
-	RESPONSIBILITIES	4 4 5
-	RESPONSIBILITIES	4 4 5 5
-	RESPONSIBILITIES	4 4 5 5 5
-	RESPONSIBILITIES	4 4 5 5 5 5 5
7.	RESPONSIBILITIES All Customer Facing Staff Neighbourhood & Homeownership Teams Customer Experience team Head of Customer Improvement & Experience Executive & Board	4 4 5 5 5 5 5 5
 8. 9. 	RESPONSIBILITIES All Customer Facing Staff Neighbourhood & Homeownership Teams Customer Experience team Head of Customer Improvement & Experience Executive & Board MONITORING AND REPORTING	4 4 5 5 5 5 5



1. INTRODUCTION

- 1.1. Peaks & Plains Housing Trust (The Trust) is committed to making sure their services can be easily accessed by all their customers, including those who have additional needs, vulnerabilities or disabilities. The Trust's Reasonable Adjustments policy is in place to make sure customers can access services easily and live comfortably and independently in our homes.
 - 1.2. This policy has been written in accordance with the Housing Ombudsman Service's Complaints Handling Code and the Trust's commitments under the Equality Act 2010. Under the Equality Act 2010, the Trust has a legal duty to make reasonable adjustments to their services to ensure customers are not disadvantaged if they have a disability or additional needs.

2. SCOPE

- 2.1. This policy is used by the Trust to meet the obligations placed upon the organisation to make reasonable adjustments for customers within our communities. This policy applies specifically where the Trust provides a service to its customers and any additional service users within its accepted remit (separate guidance is available for staff).
 - 2.2. Typically, the Trust may make reasonable adjustments to a customer's home (for example a physical adaptation) or to the way services are provided. The Trust has a separate policy on how customers can request adaptations to our homes, which is available on our website.

3. LEGAL AND REGULATORY REQUIREMENTS

- 3.1. The Trust must operate within the framework created by legislation. This policy and subsequent procedure have been written regarding relevant legislation which includes the following (non-exhaustive) list:
 - Social Housing (Regulation) Act 2023
 - Equality Act 2010
 - Human Rights Act 1998
 - The Regulator for Social Housing Consumer Standards
 - The Housing Ombudsman's Complaint Handling Code

4. **DEFINITIONS**

4.1. What is a Reasonable Adjustment?

4.1.1. A reasonable adjustment involves making a change to the way the Trust usually does things to take account of a customer's individual needs.



- 4.1.2. This may be a physical alteration in a customer's home, a change to the way in which the Trust delivers their services, or a change to how a customer is communicated with. There is no set list of options as each reasonable adjustment is suited to meet an individual's needs.
- 4.1.3. For each request, the Trust will work closely with the customer or their representative to discuss what is reasonable in the circumstances.
- 4.1.4. Some examples of the adjustments we can make include:
 - Adaptations to a customer's home, such as grab bars, handrails, lever taps etc.
 - When meeting with customers, the Trust can provide auxiliary aids or a portable induction loop if a customer wears hearing aids, allow for rest or comfort breaks where helpful or communicate through a representative on a customer's behalf.
 - When communicating with customers, the Trust can provide information in alternative formats such as large print, or in a customer's preferred method of communication such as email, phone or letter.

5. OUR POLICY

5.1. **Deciding what is reasonable**

- 5.1.1. The Equality Act does not define what is 'reasonable', but guidance from the Equality and Human Rights Commission suggests the following considerations when deciding whether an adjustment is 'reasonable' or not:
 - The effectiveness of the adjustment in preventing or reducing the disadvantage.
 - The practicality of the Trust making the adjustment(s).
 - The availability of resources, including external assistance and finance.
 - Any disruption to services that making the adjustment(s) may cause.
- 5.1.2. In most cases, the Trust will be able to agree the requested adjustment quickly. However, sometimes, it may be necessary for the Trust to carry out a more detailed assessment and seek advice from expert partner organisations to make sure the Trust provides the best possible solution.
- 5.1.3. In the event where a reasonable adjustment is unable to be made, the Trust will work with customers to find the most appropriate alternative solution.

5.2. How we will record customers' needs

5.2.1. At the start of a customer's tenancy the Trust will ask if customers have any additional support needs or communication preferences. The Trust will record what customers tell them on their internal systems and proactively ensure this information remains up-to-date, so the Trust can meet the customer's specific needs throughout the duration of their tenancy.



5.3. How can customers request a Reasonable Adjustment?

- 5.3.1. Customers can contact the Trust by phone, email, post or in person, details below:
 - Call: 0800 012 1311
 - Email: trust@peaksplains.org
 - Write: Peaks & Plains Housing Trust, Ropewalks, Newton Street, Macclesfield, SK11 6QJ explaining what the adjustment is and why it's needed or make an appointment to visit the offices in person at the above address.
- 5.3.2. Customers can nominate a representative to enquire about a reasonable adjustment on their behalf if they would prefer. This could be a family member, friend, social worker or support worker if the customer has given the Trust permission to deal with them.

5.4. **Reasonable adjustments to our complaints process**

5.4.1. If necessary, the Trust will adjust their complaints service, to ensure customers are not disadvantaged should they wish to make a complaint. During the process, the Trust will discuss any reasonable adjustment requirements with their customers and commit to using their preferred communication preference throughout.

5.5. Appealing a decision

5.5.1. The Trust will deal with all customers in a fair and non-discriminatory way. If a customer is unhappy with a reasonable adjustment decision the Trust has made, they can appeal the decision by contacting the Trust who will respond in line with their Complaints Policy.

6. EQUALITY, DIVERSITY & INCLUSION

- 6.1. This policy will ensure that the Trust provides its services in a way that is fair and inclusive to all of its customers. We will make reasonable adjustments that allow our customers to have equable access to the use of our services.
- 6.1.1. Where we cannot accommodate a customer's request for an adjustment, we will explain why. We will work to resolve these customer's needs as equitably as possible, within the resources of the Trust.
- 6.1.2. An Equality Impact Assessment has been completed and reviewed by EMT.

7. **RESPONSIBILITIES**

7.1. All Customer Facing Staff

7.1.1. It is the responsibility of all customer facing staff to have read and understood this policy. When interacting with Trust customers, staff must refer to their tenancy records to ensure that any recorded reasonable adjustments are understood and implemented.



7.2. Neighbourhood & Homeownership Teams

7.2.1. The Trust's Neighbourhood & Homeownership teams will be responsible for capturing and recording customers reasonable preferences throughout the onboarding process for new tenants.

7.3. Customer Experience team

7.3.1. The Trust's Customer Experience team will be responsible for updating and deleting reasonable preferences throughout the lifetime of the customer's tenancy.

7.4. Head of Customer Improvement & Experience

7.4.1. The Head of Customer Improvement & Experience will oversee the operational implementation of this policy, including decision making on appropriate reasonable adjustments and complaints and appeals.

7.5. Executive & Board

- 7.5.1. The Trust's Executive team will be responsible for the approval of this policy and will receive reports that demonstrate compliance with this policy.
- 7.5.2. The Trust's Board will receive reports on the overall approach to equality, diversity and inclusion.

8. MONITORING AND REPORTING

8.1. The Trust will measure the percentage of customers for whom it has recorded reasonable adjustments, to allow the Trust to understand the breadth and scope of customers who require adjustments. Anonymised key performance monitoring information will be shared with the Trust's Senior Managers, Executive Leadership Team, Involved Tenants, and the Board.

9. CONSULTATION

9.1. This policy has been reviewed in consultation with the Senior Management Team and the Trust's customer-based Challenge Group.

10. REVIEW

10.1. The Trust will review this policy every 3 years, or earlier, if required by statutory, regulatory, legislative, or best practice requirements or there is the need to update this policy following reviews of other Trust policies or improvements identified by service reviews, scrutiny or feedback from customers.

11. ASSOCIATED DOCUMENTS

- Complaints Policy
- Aids and Adaptations Policy



- Unacceptable Behaviour Policy
- Equality, Diversity and Inclusion Policy
- Vulnerable Customers Strategy
- Vulnerability procedure

POLICY INFORMATION

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