



Reasonable Adjustments Policy for Tenants & Customers

February 2024

Owner: Customer Experience Manager

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1.0	New Policy	08/02/2024	HoST	September 2024

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1. Our policy is...

- 1.1 Ongo Homes is committed to ensuring Equality and Diversity is embedded across all of our services and working practices and actively promotes Fairness, Respect, Equality, Diversity, inclusion and Engagement (FREDIE) in everything we do.
- 1.2 We want to ensure no one is disadvantaged due to a disability when accessing our services, this includes mental health conditions. We will therefore make reasonable adjustments for disabled people.
- 1.3 Reasonable adjustments are changes to work practices, either on a temporary or permanent basis, which aim to avoid disadvantaging someone who has a disability and to provide extra support where necessary.
- 1.4 This policy does not cover every scenario as they are tailored to individual circumstances, but it is intended as a general statement.

2. It applies to...

- 2.1 This policy applies to all Ongo's customer's and tenants that makes contact or are accessing services we provide.
- 2.2 Many of the arrangements we offer for disabled people can also be made available for those who do not have disabilities. Reasonable adjustments will be considered for anyone that has a protected characteristic or simply where it is reasonable to adjust a service to improve accessibility.

3. Because we want to...

- 3.1 The main aims of this policy are to ensure we:
 - Comply with the Housing Ombudsman Complaints Handling Code and our commitments under the Equality Act 2010
 - Improve accessibility for everybody that we deal with or who comes into contact with us
 - Make clear what will be considered when dealing with requests for reasonable adjustments.

4. We will...

- 4.1 Ongo will ensure compliance with the Equality Act 2010 (the Act) and the duty to make reasonable adjustments. The Act places a legal duty on Ongo to make reasonable adjustments:
 - 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

- 4.2 Although the duties under the Act are specifically in respect of making reasonable adjustments for disabled people, Ongo will extend this to anyone who would be disadvantaged due to a protected characteristic under the Act.
- 4.3 Requests for reasonable adjustments can be made through any contact method, for example through telephone contacts, written communications, published documents such as this policy and through various digital communication methods such as the website.
- 4.4 If a tenant or customer wishes and where this is reasonable, they can nominate a representative to deal with their request on their behalf. There may be occasions where Ongo will need to request authority to discuss the customer's request with the representative. An example representative could be a family member, friend, social worker or support worker (this list is not exhaustive).
- 4.5 There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. We will discuss the requirements with the individual concerned and seek to reach agreement on what may be reasonable in the circumstances.
- 4.6 Ongo will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be. Examples of reasonable adjustments can be found in our reasonable adjustment options document (Appendix 1).
- 4.7 Ongo commits to consider all reasonable adjustments requests from customers. Although the Equality Act 2010 does not specifically define what 'reasonable' means, the guidance suggests the relevant factors are:
- The effectiveness of the adjustment to prevent or reduce a person who feels disadvantaged due to their disability
 - The practicality of us making the adjustment
 - The availability of our resources
 - Any disruption to services that are as a result of the adjustment
- 4.8 We may not be able to provide additional time to tenants/customers when there are legislative / regulatory deadlines to meet.
- 4.9 The reasonableness of an adjustment will be evaluated against the resource available to Ongo. In practice many reasonable adjustments will involve little or no cost or additional resourcing requirements and are relatively easy to implement.
- 4.10 When making reasonable adjustments we are not required to change the basic nature of policies, practices or services offered.

5. Making sure we do what we say...

- 5.1 All tenants / customers will be asked whether they have any support needs and/or communication preferences.
- 5.2 Ongo will record impairments and vulnerabilities for our tenants / customers on our CRM system to ensure a proactive approach and improve services to our tenants / customers.
- 5.3 Ongo will record all reasonable adjustments made on our CRM system, outlining the adjustment agreed with the customer. Reports can be produced detailing the reasonable adjustments agreed to ensure the best services are being provided.
- 5.4 It is the responsibility of whoever receives the reasonable adjustments request to ensure the details are recorded and confirm with the tenant / customer what has been agreed and the next steps.
- 5.5 Ongo will deal with all tenants / customers in a fair way, free from discrimination. If a customer is unhappy with an agreed reasonable adjustment, they can make a formal complaint through our complaint process.

6. Other things to bear in mind...

- 6.1 This policy also links to our:
- Complaints and Feedback Policy
 - Equality and Diversity Policy
 - All customer facing, operational policies
- 6.2 The main pieces of legislation and regulation relevant to this policy include:
- Equality Act 2010
 - Social Housing (Regulation) Act 2023
 - RSH Consumer Standards
 - Housing Ombudsman Complaints Handling Code

7. We'll look at this again...

- 7.1 This policy will be reviewed every three years unless it has been identified that an annual review is required. We will also review earlier if any regulatory or legislative changes occur and have an impact on this policy.

8. What we mean...

Reference	Definition
Protected Characteristics of the Equality Act 2010	<ul style="list-style-type: none">• Disability• Age• Sex (Gender)• Sexual Orientation

Reference	Definition
	<ul style="list-style-type: none"><li data-bbox="483 208 807 241">• Gender Reassignment<li data-bbox="483 248 815 282">• Pregnancy & Maternity<li data-bbox="483 288 879 322">• Marriage & Civil Partnership<li data-bbox="483 329 592 362">• Race<li data-bbox="483 369 735 403">• Religion / Belief

Appendix 1 - Reasonable Adjustment Options

The table below illustrates the type of adjustments that can be made; however this list is not exhaustive, every request should be considered individually, and every effort should be made to provide the adjustment where it is reasonable to do so and in line with the Reasonable Adjustments Policy.

Type of Reasonable Adjustment
Provision of auxiliary aids
Provision of written materials in different formats such as braille, larger print, language translations etc.
Extension of time limits where it is lawful to do so
Use of different communication methods in addition to written text
Use of Plain English or easy read documentations
Communication through customer representatives and advocates
Extra rest or comfort breaks during customer meetings
Change of venue for meetings to accommodate accessibility
Arranging contact or meetings at different times to meet a customer's needs
Understanding individual neuro diversity and working with the individual to communicate effectively
Video sign language translations