



# Reasonable adjustment policy

Approved by: Customer Experience Committee

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Next review date: 2028

Applies to: RHP (Association)

# Reasonable Adjustments Policy

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## INTRODUCTION:

We are committed to providing fair, inclusive, and accessible services for all residents, customers and stakeholders. We recognise that residents and customers with disabilities, long-term health conditions, or additional support needs may face barriers when accessing our services.

We are committed to ensuring that anyone with a disability has full access to our services and are not disadvantaged. Where barriers exist, or are identified, that prevent or limit access to services, we will consider making reasonable adjustments that will remove and / or minimise them.

A reasonable adjustment refers to any change or modification to our usual ways of working that helps to ensure a disabled resident is not placed at a substantial disadvantage compared to others who do not share the same condition or need. These adjustments are essential to creating a more equitable environment for all.

This policy outlines our approach to making reasonable adjustments. It sets out our legal responsibilities, how requests will be considered, and demonstrates our commitment to delivering services that meet the diverse needs of our residents.

This policy applies to all our customers, including residents and members of their household living in general needs, temporary, sheltered, shared ownership or leasehold properties.

### Our Duties and Responsibilities

The Equality Act 2010 requires us to provide reasonable adjustments to disabled people. Disabled people are defined under the Act as “those who have a physical or mental impairment which has a substantial and long-term adverse effect on that person’s ability to carry out normal day to day activities.” As a service provider we have a duty to make reasonable adjustments, if any of our policies and procedures, or the way we deliver our service, places the disabled person at a substantial disadvantage compared to someone who is not disabled.

### **Aims and Objectives**

We will consider adapting our standard services for residents with a disability – as defined by the Equality Act 2010 – and for those experiencing other substantial and long-term challenges that affect their ability to carry out day-to-day activities.

This may include residents who:

- have physical impairments, sensory impairments, learning disabilities, mental health conditions, or addictions

- are neurodivergent, including those with autism, ADHD, dyslexia, dyspraxia, dyscalculia, or Tourette’s syndrome
- have limited literacy, numeracy, digital, or technical skills that may impact their ability to engage with our services
- are experiencing significant life events such as bereavement, redundancy, loss of income, divorce, relationship breakdown, or are victims of domestic abuse, racial harassment, or anti-social behaviour
- are facing financial hardship due to limited financial knowledge, confidence in managing money, or unexpected financial pressures.

### Aims

The aim of this policy is to ensure that:

- residents with disabilities and/or support needs can access services on an equal basis
- Employees understand their legal duty to make reasonable adjustments
- reasonable adjustments are considered proactively and sensitively, based on individual needs and circumstances
- services are continually reviewed to anticipate the needs of people with disabilities
- we fulfil our duties under the Equality Act 2010, by making reasonable adjustments where needed to prevent disadvantage and discrimination
- we act in line with our values: We know our stuff; We make it happen and; We Care
- we maintain up to date and accurate records of reasonable adjustments
- we meet the requirements of the Regulator of Social Housing’s Transparency, Influence and Accountability Standard and the Housing Ombudsman’s Complaint Handling Code.

### **Examples of Reasonable Adjustments**

Adjustments vary based on the specific circumstances, challenges and needs of a resident. Examples can include:

- providing information in large print, braille, audio, or easy-read formats
- changes to communication methods (e.g. using email instead of letters or visiting a resident instead of communicating in writing)
- providing interpreter services or additional meeting breaks

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- offering a choice of staff member for home visits (e.g. female employee upon request)
- providing auxiliary aids or services (e.g. sign language interpreters)
- extending response times or deadlines where legally permissible
- adapting physical environments or access routes
- offering tailored appointment times or face-to-face support.

## **Requesting a Reasonable Adjustment**

Residents can request a reasonable adjustment by any means, including:

- directly with any RHP employee
- through a representative
- by telephoning 0800 032 2433
- online, through our "Contact us" page on our website

## **Assessing Reasonable Adjustment Requests**

The Equality Act 2010 does not prescribe a definitive list of what constitutes a reasonable adjustment. We will assess each request on a case-by-case basis, considering the resident's specific circumstances and needs as well as the context of the service being provided.

When determining whether an adjustment is reasonable, we will be guided by the Equality and Human Rights Commission's Code of Practice Services, public functions and associations: Code of Practice | EHRC. Key considerations include:

- Effectiveness – Whether the adjustment is likely to remove or reduce the disadvantage experienced by the individual.
- Practicality – The feasibility of implementing the adjustment within the constraints of our operations and service delivery.
- Cost and Resources – The financial implications of the adjustment and the availability of internal or external resources to support it.
- Disruption – The extent to which the adjustment may impact the delivery of services to other residents or operations more broadly.

We may not be able to implement adjustments where:

- it is not practicable due to significant financial or operational limitations
- it would contravene legal or statutory obligations, such as health and safety regulations (e.g. storing items in communal corridors)
- the cost or disruption involved would be disproportionate to the benefit gained
- the request is not clearly linked to the resident's specific disability, condition, or circumstances
- it requires a specialist assessment or clinical judgement beyond the scope or professional remit of RHP staff.

All requests for reasonable adjustments will be considered promptly and sensitively. Where a request is particularly complex, resource-intensive, or may have broader organisational implications, the decision will be escalated to a senior manager such as a Head of Service or Director.

Residents who are dissatisfied with how a request has been handled are encouraged to raise their concerns through our formal complaints procedure. Details of the process are available on our website: [RHP | Customer Engagement | How to Complain](#).

## **Identifying Additional Needs**

We collect information about disabilities or additional needs during the onboarding process for new tenants. In addition:

- colleagues may enquire about additional needs during routine or ad-hoc contact with residents
- colleagues and contractors are expected to proactively consider whether a resident may have additional needs based on their own observations or by reviewing information already held in a resident's records
- residents are encouraged to inform us of any changes in their personal circumstances that may affect their ability to engage with our services.

If a safeguarding concern is identified during interactions with a resident, we will escalate it in line with our Safeguarding Policy, which outlines our approach to identifying and supporting vulnerable adults and children at risk.

## **Recording and Reviewing Adjustments**

All agreed reasonable adjustments are recorded in our customer database. We will monitor and record the number and type of reasonable adjustment requests and the number of reasonable adjustments

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that are made. We will carry out periodic training on the Equality Act and reasonable adjustments for all staff.

## **Legal and Regulatory Framework:**

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This policy reflects the requirements of:

- the Equality Act 2010
- the Regulator of Social Housing's Tenant Involvement and Empowerment Standard
- the Housing Ombudsman's Complaint Handling Code.

## Governance and Responsibilities

The Director of Operations holds overall accountability for this policy.

All colleagues are responsible for applying its principles and ensuring our services are accessible to all.

We will continue to use any resident feedback on the reasonable adjustment process to improve the policy over time.

## Related Policies and Procedures

- Complaints Policy
- Safeguarding Policy
- Vulnerable Persons Policy

## **Training and Awareness**

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Employee Training: We will provide training to employees on safeguarding that will include the needs and challenges faced by vulnerable customers.

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## **Policy Review:**

This Reasonable Adjustments Policy will be reviewed regularly to ensure its effectiveness and relevance.

This policy should be read in conjunction with our Vulnerable Customer Policy.

## **Complaints**

If you are not satisfied with the service you have received from us, you can raise a complaint. We will accept complaints from those who are supporting you as long as you have given them your permission. We will make reasonable adjustments to our services and how you access them based on what you have shared with us about your vulnerability. We have a Complaints Policy that is available on our website or can be accessed by contacting us. It sets out the details of how you can raise a complaint.

The Housing Ombudsman Complaints Handling Code requires us to adapt normal policies, procedures, or processes to accommodate an individual's needs. There is a requirement that landlords shall have a reasonable adjustments policy in place to address this. This policy meets those requirements.