

<b>Committee:</b> Housing Management and Almshouses Sub-Committee	<b>Dated:</b> 17/04/2024
<b>Subject:</b> Reasonable Adjustments Policy	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	2, 3
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>£</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>N/A</b>
<b>Report of:</b> Judith Finlay, Executive Director, Community and Children's Services	<b>For Decision</b>
<b>Report author:</b> Liam Gillespie, Head of Housing Management	

### Summary

We are committed to ensuring that our services can be accessed by residents with disabilities and additional needs. To support this commitment, a Reasonable Adjustments Policy has been drafted for the Housing Division.

The policy provides a brief statement on how we will respond to the need to vary our services for individuals in line with the requirements of the Equality Act 2010. It is good practice for housing providers to maintain such a policy given the varied needs of residents accessing housing services.

The policy is intended to promote fairness and ensure that those accessing our services have their individual needs considered promptly and sensitively. Implementation of the policy will be supported by training and awareness-raising for Housing Division staff, and a brief procedure to ensure compliance.

### Recommendation

Members are asked to:

- Approve the Reasonable Adjustments Policy for use by the Housing Division

### Main Report

## Background

1. The Equality Act 2010 (“the 2010 Act”) places an obligation on public sector organisations to make reasonable adjustments to their services to ensure that they are accessible to disabled people, to reduce the likelihood of discrimination against those with this protected characteristic.
2. ‘Reasonable adjustments’ refers to modifications or changes to physical environments, or policies, procedures and practices, to make them more accessible to disabled people so they are not placed at a disadvantage when compared to those without a disability.
3. Under the 2010 Act, the legal duty to make reasonable adjustments arises in three circumstances:
  - 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. Landlords must also consent to the making of disability-related improvements to rented residential premises unless the request is unreasonable. For our purposes, this relates to requests for disabled adaptations following an occupational health assessment.
5. ‘Substantial disadvantage’ means something which is ‘more than minor or trivial’. What is reasonable depends on the context of the request and the resources of the landlord. It is about putting in place what is practical to minimise disadvantages, taking into account what is affordable and achievable.

## Examples of Reasonable Adjustments

6. The policy does not aim to describe every situation in which we might make a reasonable adjustment. It is a general statement of our commitment to ensuring that disabled residents (and other service users, such as housing applicants) are not at a disadvantage when using our services.
7. The following are typical examples of reasonable adjustments that we might be asked to make:
  - Altering physical features: installing automatic door openers, building ramps, widening a doorway, converting bathrooms into wet rooms

- Auxiliary aids: replacing taps or door handles, adapting doorbells/entry systems, installing a stairlift, fitting grab rails
8. Another area in which reasonable adjustments might be considered relates to the application of housing management policies or decisions. For instance, we may consider:
- Giving someone longer to respond to requests for information
  - Extending a deadline as part of our complaints process
  - Giving someone longer to complete a task, such as clearing a property at the end of a tenancy
  - Finding someone an alternative parking space or garage, which better suits their needs
  - Finding temporary alternative accommodation for a resident while works are carried out in their home
  - Assisting an applicant to bid for properties through our Choice-Based Lettings system, for instance by auto-bidding or placing manual bids for them
  - Providing communications in a specific format (e.g. Braille, large print or coloured paper), or using a sign-language interpreter at a meeting or event
9. When deciding what is reasonable, we will consider:
- How effective the adjustment(s) will be in assisting someone with a disability and in preventing or reducing the possibility of them being at a disadvantage
  - The practicality of us making the adjustment(s)
  - The cost of the adjustment(s) and whether this is possible within our resources, and
  - Any disruption to the service that making the adjustment(s) may cause.
10. In circumstance where we are unable to make an adjustment due to cost or resources, we will work together with the individual to find the most appropriate alternative solution for them.
11. In most cases, we will be able to assist people and staff often make very quick decisions on adjustments as a routine part of their work. The requests that require more detailed consideration tend to be those involving making physical changes to a property, which must be assessed for cost and suitability.

12. A well-established process exists for property adaptations for disabled residents, which involves professional referrals to occupational health experts, who will recommend adjustments to make the home more suitable for the resident.

13. In 2023/4, we carried out work to adapt 25 homes to meet tenants' needs, at an approximate cost of £83,000. These works included converting bathrooms to accessible wet rooms, providing accessible shower enclosures, fitting handrails and grab rails, and installing stairlifts.

## **Staff Training**

14. Equalities duties and reasonable adjustments considerations are included in our 2024/5 training plan for the Housing Division. We will ensure that mandatory training is delivered on these subjects to support the implementation of this policy.

## **Corporate & Strategic Implications**

### **Strategic implications**

This policy and related practise supports the following outcomes of our Corporate Plan 2024-29:

- Diverse, engaged communities
- Providing excellent services

Ensuring service provision is accessible and meets the needs of service users is key, and will be promoted by the implementation of this policy, and associated staff training and awareness.

Financial implications - none

Resource implications – none.

Legal implications – none.

Risk implications – none.

### **Equalities implications**

This policy promotes compliance with the Public Sector Equality duty and our obligations under the Equality Act 2010 regarding reasonable adjustments. The impact on those with relevant protected characteristics will be positive, as the policy promotes greater awareness of the need to consider reasonable adjustments and supports the delivery of more accessible services.

Climate implications – none.

Security implications – none.

## **Conclusion**

15. To support our commitment to eliminating discrimination and ensuring that our services are as accessible as possible to those with disabilities or additional needs, a Reasonable Adjustments Policy has been drafted for use by the Housing Division.

16. The policy outlines how we will meet the requirement to make reasonable adjustments to avoid substantial disadvantage to disabled people, as required by the Equality Act 2010.

17. The implementation of the policy will include delivering training to Housing Division staff on relevant equalities considerations when responding to service requests.

### **Appendices**

- Appendix 1 – Draft Reasonable Adjustments Policy
- Appendix 2 – Responses to Housing User Board (HUB) consultation, March 2024
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