



## Reasonable Adjustments Policy 2025-28

### Policy Control

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## 1. Introduction

Derby Homes aims to ensure all customers have access to services that enable them to live independently and with dignity, in housing that is safe and secure. This policy outlines our approach to identifying and meeting the needs of customers who may require adjustments to effectively engage with our services. It is one of the key pillars of our Equity, Diversity, and Inclusion Strategy and incorporates principles from the Housing Ombudsman's *Spotlight report on attitudes, respect and rights – relationship of equals*, as well as legal requirements established by the Equality Act 2010.

This policy sets out a clear framework for recognising and responding to our customers' diverse needs, aiming to ensure a consistent and equitable approach.

## 2. Policy objectives

This policy aims to:

- Actively identify and remove barriers to accessing our services.
- Provide clear guidance on making reasonable adjustments in line with the Equality Act 2010 and Social Housing Regulator standards.
- Ensure customers are aware of how to request adjustments and how we consider them

### 3. Equity and inclusivity

Under the Equality Act 2010, Derby Homes, as a public service provider, has a duty to:

- Eliminate discrimination, harassment, victimisation, and prohibited conduct.
- Advance equity of opportunity between individuals with protected characteristics and those without.

Our policy considers all protected characteristics under the Equality Act 2010, and any other individual circumstances that may require adjustments in service to avoid inadvertent discrimination.

In line with the Regulator of Social Housing's Transparency, Influence and Accountability Standard, we aim to treat all customers fairly and with respect, using data to understand and meet their diverse needs.

### 4. Understanding and identifying customer needs

We recognise that customers may have varying needs beyond the protected characteristics in the Equality Act 2010. These include, but are not limited to:

- Physical, sensory, learning disabilities, or mental health conditions
- Serious illness
- Language barriers or literacy challenges
- Socio-economic disadvantage
- Domestic abuse or safeguarding concerns
- Substance misuse, homelessness, or risk of homelessness
- Individuals with care backgrounds or dependency histories.

These needs may be temporary, long-term, or change over time. We aim to implement reasonable adjustments that support fair access to our services, recognising that a customer's needs may vary depending on their circumstances at a particular point in time and that an inclusive approach is essential for equitable service.

### 5. Our approach: Recognise, Record, and Respond

We will test our services according to the 3Rs (Recognise, Record, Respond) approach recommended by the Housing Ombudsman in the '*Relationship of Equals*' spotlight report.

## Recognise

We will proactively **recognise** potential needs for adjustments at various touchpoints with customers, including:

- Sign up of new tenancy
- Home visits or office appointments
- Standalone data collection surveys
- Using an online self-service portal
- Where we complete *Equality Act Checklists* or *Needs Assessments*
- During routine points of service contact (by emails or over the phone)
- Through contact with our contractors or referrals from other agencies
- Any customer surveys
- During mandatory checks, such as a gas safety visits
- Where customers ask us to consider an adjustment

Some of the information we collect may indicate possible barriers to accessing our services. We may explore this with customers proactively.

## Record

We will **record** relevant information on our systems and ensure it is accurate, up to date and accessible to teams that may need it at point of service. This includes:

- Protected characteristics
- Any additional needs
- Any agreed adjustments to how we deliver our services
- The date we collected the information
- When the information may need to be reviewed
- Delegated authority arrangements (e.g. carers or support workers).

## Respond

We will **respond** by treating customers as individuals and equals, involving them in decisions about their housing and services. This approach will ensure customers feel valued, heard, and respected. We will be transparent about our process for considering any adjustments and be clear on our decision and any outcomes it involved. Our response will enable any adjustments to be delivered consistently across our services.

We will adopt a collaborative approach by working with, referring, or signposting to external agencies and relevant bodies to provide additional support, where needed.

## 6. Considering adjustments

In accordance with the Equality Act 2010, we are required to provide reasonable adjustments for disabled people who have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Our duty is to consider reasonable adjustments if the way that we deliver our services places a disabled person at a substantial disadvantage compared to someone who does not have a disability.

### Responding to requests for adjustments

Before we agree an adjustment, we consider factors such as:

- Whether the adjustment would be effective in overcoming the substantial disadvantage
- How practical it would be for us to make the adjustment
- The costs of making the adjustment, our resources, and any available assistance
- Any disruption making the adjustment would cause to our services
- Any other relevant factors or information.

### Examples of adjustments may include

Depending on individual circumstances, adjustments could include:

- Providing flexible appointment times
- Allowing more time for customers to answer the door for appointments
- Extended time for different services such as appointments for repairs or
- Allowing extra time for complying with responsibilities of the tenancy agreement
- Coordinating joint visits with contractors, surveyors, representatives, or advocates
- Offering in-person visits for services that typically carried out by phone
- Using alternative written formats, such as large print, Braille, or easy read
- Access to interpreters or captioning services
- Explaining any written communication over the phone
- Digital accessibility enhancements, such as ensuring website compatibility with screen readers and providing text descriptions for images
- Physical modifications to the fabric, structure, fixtures and fittings of a building
- Extending support for tenants with mental health concerns or exploring alternative actions in complex cases
- Signposting to partners and other support services for tailored support based on customer needs.

## 7. Training

Employees will receive regular on training the barriers that diverse groups face, and what Derby Homes' approach is to remove these barriers. This training also provides an understanding of data collection methods, the importance of data integrity, our processes for updating customer information on needs, and how to use the data on agreed adjustments.

Training as a minimum will include the Equalities Act 2010, unconscious bias, cultural and religious awareness, disability and long-term illness awareness, accessibility, socio-economic disadvantage, and mental health.

## 8. Monitoring and Evaluation

To ensure effectiveness, we will:

- Monitor the data we record on customer age, gender, ethnicity, disability, support needs, language barriers and preferred name and title
- Gather feedback from customers and analyse satisfaction and dissatisfaction variables based on customer age, gender, ethnicity, disability, support needs, and language barriers
- Produce an annual report on our progress, assessing any improvements and areas for development.

Our approach includes regular audits to assess data accuracy, track complaint trends and outcomes, and maintain transparency through board reports and inclusion forums with customers and staff.

## 9. Policy review

This policy will be reviewed every three years, or sooner where further good practice guidance is published. Where necessary, significant changes may be subject to further engagement and consultation.