

Policy

Reasonable Adjustments

Policy author (name and title)	Business Improvement Team
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Review Frequency	3 years (or sooner, in response to legislative, regulatory or policy changes)
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Version number	3.0
Has this policy been signed off by the Client Forum (if applicable)?	6 February 2024
Affected	All colleagues

Values

Respect	Empowerment
<ul style="list-style-type: none"> Value diversity and fairness Act with honesty and integrity Treat people with care and compassion 	<ul style="list-style-type: none"> Support the needs of each individual Encourage personal development and independence Provide safety, stability and security
Responsibility	Excellence
<ul style="list-style-type: none"> Work together, in partnership Take responsibility for our actions Continue learning and improving 	<ul style="list-style-type: none"> Provide a first-class service Deliver excellent value for money Explore innovative ways of working



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1. Introduction

About this policy

- 1.1. We are committed to making sure everyone can use our services easily and that everyone is included. We always make reasonable adjustments for everyone that needs them so that nobody receives a lower level of service from us.
- 1.2. This policy is designed to define what we mean by a reasonable adjustment, and how we are committed to this approach. It sets out the types of things we will consider when someone asks us to do something differently.
- 1.3. This policy relates to anyone who has a disability, is vulnerable, or has a need or circumstance that means we need to adjust the way we support them. It will be followed by all staff when providing all services.

2. Related Policies

Other policies that support this Reasonable Adjustments Policy

- 2.1. This policy deals specifically with changes we might make to the way we do things when someone needs us to be flexible because of their needs. Our vulnerability policy gives broader detail about how we provide our general services to vulnerable people.
- 2.2. When we are dealing with reasonable adjustments we may also use these other policies and procedures to help agree what changes we might make:
 - a. Complaints
 - b. Compensation
 - c. Unacceptable Behaviour
 - d. Vulnerability
 - e. Any other policy about the service you are complaining to us about.
- 2.3. If we need to we will speak to other expert organisations for advice so we can make sure we are making the best decisions in each case. This might include disability groups, or we might ask for legal advice.

3. Legislation and Guidance

The laws and rules we have to follow

- 3.1. We follow the law as it is set out in the Equality Act 2010. We may need to adapt our normal policies, procedures, or processes meet your needs and we will follow this Act to make sure we are being fair and offering equality to everyone.
- 3.2. Under the Act there are three circumstances where we must make reasonable adjustments. These are all about making sure someone with a disability is not substantially disadvantaged by the way we do something, in comparison to someone who is not disabled. The Equality Act defines “substantially disadvantaged” as “more than minor or trivial”.

4. Definitions

How we define a reasonable adjustment

- 4.1. There are two ways we can adjust things for someone with a disability:
 - a. We can make a physical change to a building such as providing specialist equipment or adding a wet room.
 - b. We can change the way we do things such as giving you more time to send us some information we need, or providing additional support such as a sign language interpreter or translation service.
- 4.2 The Equality Act 2010 does not define what is 'reasonable', so we will consider guidance from the Equality and Human Rights Commission which says the most relevant factors are things like:
 - a. How effective any adjustment is in preventing or reducing the disadvantage for a disabled person.
 - b. How practical it is to make the adjustment
 - c. How affordable the adjustment is
 - d. Whether outside help is available, if it is needed
 - e. Whether the adjustment might mean the service is disrupted(See 5.4 for how we will consider these.)

5. Our approach to reasonable adjustments

How we deal with reasonable adjustments

- 5.1. We will not make assumptions about what you might need. Anyone can ask us to consider an adjustment and we will tell you how you can do this when we start working with you. You will also be able to find information about reasonable adjustments on our website and in our client handbook.
- 5.2. We will aim to tell you our decision within 10 working days. If it will take longer than this because it is more complex, we will tell you how long we think it will take while we consider what we can do, and we will keep you updated while we decide.
- 5.3. Any adjustment will depend on your needs and we will speak to you about that and try to reach the best agreement with you, considering the examples above in 4.2. Where it is appropriate we will include an Occupational Therapist for their professional advice.
- 5.4. There are some adjustments that all colleagues can make. These include:
 - a. Providing auxiliary aids following expert advice and to make sure you can use them in a safe way.
 - b. Providing information in different formats such as large print, braille, on coloured paper etc
 - c. Extending a time frame for something (where it is within the law)
 - d. Using email or phone calls to contact you, instead of paper letters
 - e. Using Plain English or the Easy Read service
 - f. Communicating with you through a representative
 - g. Rest or comfort breaks in meetings.
- 5.5. When you ask us to make a reasonable adjustment, this is how we will consider different factors:
 - a. **How effective it is**

Anything we change should prevent or reduce any disadvantage. We will think about whether what you have requested is the best thing we can offer to have the necessary impact for you.

b. How practical it is

We need to make sure what we do is practical. For example, we might need to do something for health and safety reasons without delay, so it may not be practical for us to give you extra time.

c. How affordable it is

If you need something that might be effective but is too expensive to be considered reasonable, we might not be able to provide it. For example if you need something which means we would need to employ a new colleague with specific skills we would need to think about how affordable it is to provide that.

d. Whether we need outside support

If we can't provide what you need ourselves, we will need to think about who might be able to provide it outside of Transform. We might also need to apply for funding to cover the adjustment which may add to the time it takes.

e. Whether it will disrupt our services

If what you need means colleagues would not be able to provide support to other people too, we would not consider it to be reasonable. It might be that we can provide the support you need, but less frequently or to a lower level than you would prefer.

5.6. We will record any reasonable adjustments we make so that all staff know what we have agreed with you. It also means that we can see where we are making lots of the same adjustments so we can improve our services for everyone by making a permanent change.

5.7. We will also keep a record of any disabilities you have told us about. We will regularly review any agreed reasonable adjustments as we are expected to.

5.8. If you are not happy with the decision we make about your reasonable adjustment request you can ask us to review this. We will ask a senior colleague to check our decision against the criteria above and they will contact you within ten working days with the final outcome, explaining the reasons for their final decision.

6. Reasonable Adjustments for Handling Complaints

Changes we will make if you have a complaint with us

6.1. If you have a complaint with us and you have a 'protected characteristic' under the Equality Act 2010, we will make reasonable adjustments to the way we handle your complaint if you need us to. Protected Characteristics are:

- a. age,
- b. disability
- c. gender reassignment
- d. marriage and civil partnership
- e. pregnancy and maternity
- f. race, religion or belief
- g. sex and sexual orientation.

Any adjustments we make for complaints will be reported to the board.

6.2. We will make sure that nobody is discriminated against by making sure:

- a. Our complaints policy is accessible and fit for purpose to meet individual needs, including being available in different formats.
- b. Our complaints policy gives genuine equal opportunities for all
- c. Our complaints policy is responsive to the needs of people with protected characteristics
- d. Our complaints policy is published on our website
- e. We speak to a range of clients through our client engagement arrangements when we make important decisions
- f. People who need it are given more time to give us information, or to respond to any enquiries about their complaint or other queries
- g. We provide support where needed such as sign language interpreters or translation
- h. We regularly tell you about the complaints policy in the annual report and other communication such as newsletters, through keywork and group or house meetings.

Appendix 1 – Reasonable adjustments flowchart summary

