

	CORPORATE Providence Row Housing Association	PRHA Reasonable Adjustments Policy VERSION: 1
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PRHA Reasonable Adjustments Policy

1. Introduction

Providence Row Housing Association (PRHA) is committed to ensuring that disabled people are not disadvantaged in accessing its services. To this end we will make reasonable adjustments for disabled people. This policy:

- Confirms our commitment to improving accessibility for everybody that PRHA deals with.
- Sets out some of the basic principles of PRHA's commitment to provide reasonable adjustments for disabled people.
- Sets out the factors that PRHA will take into account in dealing with requests for reasonable adjustments.

Many of the arrangements that we offer for disabled people can also be made available for those who do not have disabilities. For example, provision of documents in larger font than our usual font.

This policy applies to all PRHA service users and tenants.

2. The Equality Act 2010

The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. Although not specifically listed as a public body under the Act, as an employer, and as a provider of services to the public and other public bodies PRHA commits to comply with the provisions for public bodies under the Act.

Under the Act the legal duty to make reasonable adjustments arises in three circumstances:

- When 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

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- 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.

Substantial disadvantage is defined in the Equality Act 2010 s.212 (1) as 'more than minor or trivial'.

3. Definition

To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. Examples of this include:

- Allowing more time than we would usually for someone to provide information that we needed
- Providing specialist equipment or additional support such as a sign language interpreter for a workshop or event.

4. Requesting reasonable adjustments

We will let people know that we can provide reasonable adjustments for example in the following ways:

- By including a paragraph in written communications (e.g. acknowledgment letters)
- By publishing our policy on our website
- Raising awareness of this policy

5. Types of reasonable adjustments

There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. We will discuss the requirements with the person concerned on what may be reasonable in the circumstances.

Some examples of the adjustments that can be made include:

- Provision of auxiliary aids
- Provision of information in appropriate alternative formats (e.g. large print, Braille)
- Extension of time limits (where it is lawful to do so)
- Use of email or telephone in preference to hard copy letters
- Communication through a representative or intermediary

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6. How do we decide what is reasonable?

The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission suggest that the most relevant factors are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person
- The practicality of us making the adjustments
- The availability of our resources including external assistance and finance
- Any disruption to the Service that making the adjustment may cause.

Effectiveness

The adjustment should be designed to fully address the disadvantage it is meant to overcome. For example providing an audio version of documents may not properly overcome the barriers faced by the disabled person if there are other requirements that need to be overcome, for example the resident also has a hearing impairment.

Practicality

For example it may not be possible for us to provide additional time to residents if there are legislative deadlines to meet.

Resources

For an adjustment to be reasonable, it should be effective. However, it is important to remember that an adjustment which is deemed effective, may not be considered reasonable. For example resourcing is not just about the cost, but it may involve other factors for example recruiting additional staff with specific skills. If an adjustment costs a significant amount, it is more likely to be reasonable to make the adjustment if the organisation has substantial financial resources.

The reasonableness of an adjustment will be evaluated against the resource available to our Service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

In changing policies, criteria or practices we are not required to change the basic nature of the service we offer.

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Potential Disruption to PRHA service and activities.

For example, it would not usually be reasonable for a staff member to devote all of their time to one person as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

7. Monitoring

We will record and monitor the reasonable adjustments that have been requested and made, this will allow us to review the services we provide and help us identify whether there are any wider steps that we can take to improve our services.

8. Dealing with complaints about our service

We are committed to provide a high standard of service, dealing with everyone in a way that is fair and free from discrimination.

If someone is dissatisfied with the arrangements we have made for providing reasonable adjustments, we will respond in accordance with our complaints policy.

If necessary when reviewing our decision and seek advice from specific expert disability groups or seek legal advice.

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