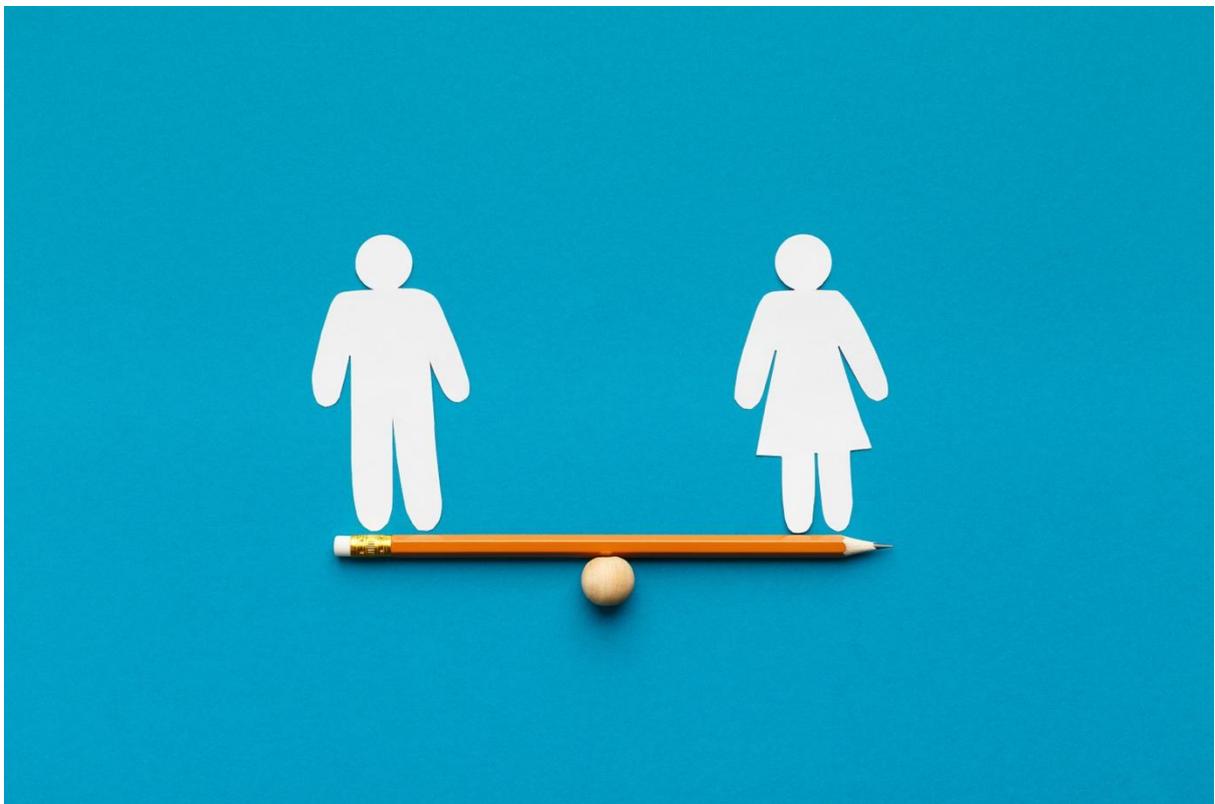

Reasonable Adjustments Policy



February 2026 | This policy relates to Elmbridge Borough Council Residential Properties



Elmbridge
Borough Council

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1. Purpose of policy

We're committed to making sure that all our tenants, including those with disabilities or additional needs, have fair and equal access to our services. This policy sets out our approach to making reasonable adjustments in compliance with statutory duties under the Equality Act as well as the Housing Ombudsman Service's Complaints Handling Code and the Regulator of Social Housing's revised Consumer Standards.

2. Scope of the policy

This policy explains what a 'reasonable adjustment' is, in what type of circumstances we'll make them, and how tenants can request them.

This policy applies to all our tenants and registered members in general needs and temporary accommodation. Adjustments may vary depending on the tenancy type and individual circumstances.

3. Legal and Regulatory Framework

- The Housing Ombudsman Service's Complaints Handling Code
- Equality Act 2010
- Human Rights Act 1998
- Social Housing (Regulation) Act 2023
- Regulator of Social Housing Tenant Involvement and Empowerment Standard
- Data Protection Act 2018 and UK GDPR
- Care Act 2014 and Children Acts 1989/2004 (safeguarding duties)

4. Aims of the Policy

To fulfil our legal obligations under the Equality Act 2010 by making reasonable adjustments for tenants with disabilities and additional needs, ensuring equal access to services and reducing disadvantage.

We are committed to ensuring all our tenants have equal access to our services, whether provided by us or our managing agent on our behalf, whatever their

circumstances. One of the ways we do this is through reasonable adjustments to remove barriers or reduce any disadvantage.

This policy also applies to customers with additional needs: people who do not have a disability, but who may have a condition, life circumstance or protected characteristic which means that they may need an adjustment to be able to access our services.

We acknowledge and understand that by having a disability, it does not automatically mean a person has additional needs. Equally, not all our tenants with additional needs have a disability.

This policy sets out our definition of 'reasonable', provides an overview of the types of adjustments we will consider and how tenants can request a reasonable adjustment.

5. Definitions and Principles

A reasonable adjustment means changing how we usually deliver services to remove barriers for tenants with disabilities or additional needs. Adjustments may include physical changes, communication support, or procedural flexibility.

Disability: Under the Equality Act 2010, a person is considered to have a disability if they have a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Vulnerability: The Housing Ombudsman Service defines vulnerability as “A dynamic state which arises from a combination of a resident’s personal circumstances, characteristics and their housing complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced.”

6. Identifying Additional Needs and Priorities

We identify additional needs as through:

- Initial tenancy assessments
- Ongoing contact with tenants to assess if their tenancy or lease requires intervention
- Staff obligations and safeguarding indicators.

Additional needs may be caused by personal circumstances, timing, and/or whether there’s existing support in place. This is why we’ll assess additional needs/priority on a case-by-case basis

Tenants will be asked whether they, or any household members, have any additional needs at the start of their tenancy.

During any type of contact with us or our managing agent (who delivers services on our behalf), colleagues may ask about a tenant's needs, and tenants are encouraged to state their needs whenever possible.

Our teams, managing agent and third-party contractors are expected to look out for and respond to any additional needs tenants may have, and that they may need support or assistance. This can be from their own observations or by using the information available to them from the tenant's records.

The below indicators won't necessarily mean a tenant has vulnerable needs however may mean they have additional needs. It's important for colleagues, our managing agent, and third-party contractors to be aware of these, as early identification will mean the tenant will receive any necessary help and support as soon as possible:

Protected characteristics as defined by the Equality Act 2010– age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual Orientation.

Health and abilities – physical health impairment, sensory impairment, cognitive impairment, mental health issues, developmental condition, and addiction.

Access and skills – lack of language, literacy, numeracy, digital access, and technical skills.

Personal circumstances – major life events such as bereavement, redundancy, loss of income, divorce or a relationship breakdown, being the victim of domestic abuse, anti-social behaviour, or harassment.

Financial – low knowledge of financial matters or low confidence in managing money, difficulty in enduring financial or emotional shock due to debt or a one-off unexpected expense; low or unstable income.

Other indicators of vulnerable needs and that further support or assistance could be offered to tenants include:

- Anti-social behaviour because of mental health issues
- A repeated failure of non-engagement with correspondence or to answering the door when visited
- Hoarding, self-neglect, or other behaviours that could cause harm to themselves or their property, and their home and/or garden becoming unfit for occupation
- A detrimental change in the person's physical appearance
- Erratic and unusual patterns of rent payments and falling into arrears when the tenant previously had good payment history.

Safeguarding concerns will be raised in line with our Safeguarding Policy which sets out how we identify and support vulnerable adults and children at risk, and ensure statutory agencies are involved immediately where we have a concern.

All data recorded will be managed in compliance with the Data Protection Act 2018 and UK GDPR.

7. Keeping records of tenant's needs

Our managing agent will record any known disability or additional needs on their housing management database. This information will be shared with us and used whenever we are making contact or carrying out any work in tenants' homes. This includes any communication or access needs, and whether there is anybody with delegated authority to speak on the tenant's behalf.

We and our managing agent will use this information to deliver services that meet tenants needs wherever possible and help them access appropriate support.

The relevant staff will receive training on recording tenant needs and how to use that information appropriately to adapt housing services as required.

Our managing agent will review this tenant data regularly to make sure it is up to date.

8. What is a 'reasonable' adjustment?

A reasonable adjustment means changing how we usually do things to make sure our services are fair and accessible for all tenants.

These adjustments may include physical changes to our buildings, updates to policies, procedures, how our services are delivered, or adjusting how we communicate to meet the specific individual tenant needs.

The Equality and Human Rights Commission advises the following when deciding whether an adjustment is 'reasonable' or not:

- How effective the adjustment(s) will be in assisting a resident 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.
- Any disruption to the service that making the adjustment(s) may cause.

Where we're unable to make a reasonable adjustment due to cost or resources, we'll work together with the tenant to find the best alternative solution for them.

If you disagree with our decision, you may be able to challenge it through our Complaints Policy.

9. Examples of reasonable adjustments we offer

The adjustments we and our managing agent will make will vary depending on the needs of the tenant and the situation. It's not possible to provide a list of every reasonable adjustment but this section provides an overview of the more common adjustments that we provide for our tenants.

Examples of the reasonable adjustments which we will consider are:

- Providing information in alternative formats, for example in large print or Braille.
- Offering an interpretation service where a tenant doesn't speak English.
- Allowing longer for tenants to answer their door when we call for an appointment.
- Giving a choice of a male or female member of staff to visit where required.
- Visits in person where we would normally provide a phone service.
- Explain a letter over the phone or in person, in addition to sending it.
- Offering flexible times for appointments.
- Provide or refer for additional support for an ASB perpetrator with mental health issues.

10. How to request a reasonable adjustment

We and our managing agent will make tenants aware that we can make reasonable adjustments for them by advertising this on our websites and communications. When providing services to tenants, we will also ask them if they require any adjustments to make the service accessible.

Tenants can request a reasonable adjustment from us and our managing agent by requesting the adjustment with the member of staff they are communicating with, or by contacting customer services.

All requests will be assessed in line with statutory duties and recorded appropriately.

11. Related policies

Where there's a risk of harm, abuse or neglect to tenants, we'll follow our safeguarding policies.

Where a tenant is unhappy about a decision which has been made about a reasonable adjustment request, they can use our or our managing agent's complaints process.

Our Aids and Adaptations Policy sets out how we'll provide adaptations to help tenants continue to live independently in their home. An 'adaptation' is a physical alteration or addition to a home, designed to make it easier or safer for use by older people or people with a health condition or impairment.

12. Monitoring and Review

This policy will be reviewed every three years or sooner if required due to legislative changes or operational needs. Responsibility for monitoring its implementation lies with our Housing Services team.