1. Policy principles

At bpha we are committed to providing high-quality and accessible services that empower all customers to live safely and independently within their homes. We want to ensure their home is an environment that is safe and accessible and that our policies are inclusive for all customers.

We recognise that an illness or disability can be temporary or permanent and that 'ability' can be a changeable state influenced by multiple factors and experiences such as age, disability, pregnancy, bereavement, mental health, domestic violence, poverty and more. All of this can affect a customer's ability to carry out day-to-day tasks independently.

bpha collects personal information about customers to ensure we can offer the best possible services to individuals without discrimination. bpha will record disabilities or vulnerabilities with the consent of our customers and use it to ensure we can offer a suitably tailored service where appropriate.

The Head of Service Improvement is responsible for this Policy.

2. Policy statement

The purpose of this policy is to show our commitment to adapting our services to meet the needs of the individual customer where a reasonable adjustment is required.

This policy is for all bpha customers. It will ensure we continue to deliver high standards in customer experience, meet customers' needs and align with offers set out in our Equality, Diversity and Inclusion Strategy and our Customer Strategy.

bpha is committed to ensuring that no one is disadvantaged in any way in accessing our services. We recognise that incidents, illnesses or disabilities may impact on customers' ability to interact with bpha, or to carry out our expectations of customer responsibility.

bpha will try to use up-to-date information about customers' circumstances, however, it is the customer's responsibility to keep us informed of these, and any changes to them.

This policy does not wish to define who may need a reasonable adjustment or how we will approach each situation. It is intended as a general statement of our policy and confirms our commitment to offering accessible services.

bpha will monitor the effectiveness of this policy through customer feedback and engagement.

3. How we deliver the policy

What is a reasonable adjustment?
Where required and possible, we will make reasonable adjustments to make access to our services easier for customers. This includes carrying out physical adjustments or changes to standard work practices to avoid causing a disadvantage.

Examples of adjustments include, but are not limited to:

- Allowing more time for someone to provide information to bpha, for example in responding to an Anti-Social Behaviour report.
- Providing information in a specialist format, such as through an interpreter, translation or offering additional support such as help completing forms.

This policy does not seek to explain how we will approach every situation. It is intended as a general statement of our policy and confirms our commitment to improving accessibility of our services to everybody.

Requesting reasonable adjustments

Customers can make us aware if they need a reasonable adjustment when communicating with us.

We may not always use the term 'reasonable adjustment'; we may ask about the impact of a circumstance or situation to allow us to consider if there might be other reasonable adjustments we can make to support or assist you.

Examples of questions we may ask include "what is the impact of this situation on you and your family?" or "how are you living with this now?"

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

- Including a paragraph in written communications (for example, acknowledgement letters)
- Asking over the telephone whether a reasonable adjustment might be required
- Including a note on our published documents indicating that we can provide the document in an alternative format on request
- Publishing our policy on our website
- Working with representatives' groups and others to raise awareness of this policy
- By working with engaged customers to ensure the policy is fit for purpose, representative and accessible.

In some circumstances we will carry out a risk assessment to ensure we are supporting customers entirely as required.

Our response to requests for reasonable adjustments

In the majority of cases, we will be able to agree and deliver the required reasonable adjustment with a minimum of delay.

In some cases, we may need to consider in more detail how best to overcome the difficulty being experiencing or seek advice from expert organisations that can assist with signposting and other forms of support.

We will mutually agree the reasonable adjustment with the customer to ensure expectations are met.

Types of reasonable adjustment we can offer

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 and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about what reasonable adjustments are needed or what they should be, such as to understand the impact of the situation, to see if we can suggest anything that hasn't already been considered.

Some examples of reasonable adjustments that bpha may make include:

- Provision of auxiliary aids
- Provision of information in appropriate alternative formats (for example, large print, Braille, coloured paper and more)
- Extension of time limits (where it is lawful to do so)
- Use of email or telephone in preference to printed letters
- Use of plain English or an Easy Read format
- Communication through a representative or intermediary
- Changing dates to accommodate for religious holidays
- Rest, comfort or prayer breaks in meetings

How do we decide what is reasonable?

The Equality and Human Rights Commission suggests that the most relevant factors are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the 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 customer also has a hearing impairment.

Practicality

For example it may not be possible for us to provide additional time to customers 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 is 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.

The reasonableness of an adjustment will be evaluated against the resource available to bpha. 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.

Potential disruption to bpha activities

It would not usually be reasonable for an adjustment to have a detrimental impact on other services customers receive as a result of one reasonable adjustment.

4. Associated legislation, national standards and regulation

- The Equality Act 2010
- The Housing Ombudsman

5. Monitoring, reviews and evaluation

We will record and monitor the reasonable adjustments through Visiting and Service Guidance and via our data system. 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.

A review will take place after 12 months of the policy implementation to see if the reasonable adjustments are supporting the individualisation of services for customer's needs.

Usage of the reasonable adjustment policy will be reported to and discussed at ED&I Project Board and Operations Board annually as a minimum.

Policy Number	Approved by	Date Approved	Policy Owner
SI04	ELT	February 2024	Head of Service Improvement