

Creating equitable services

Reasonable Adjustment Policy

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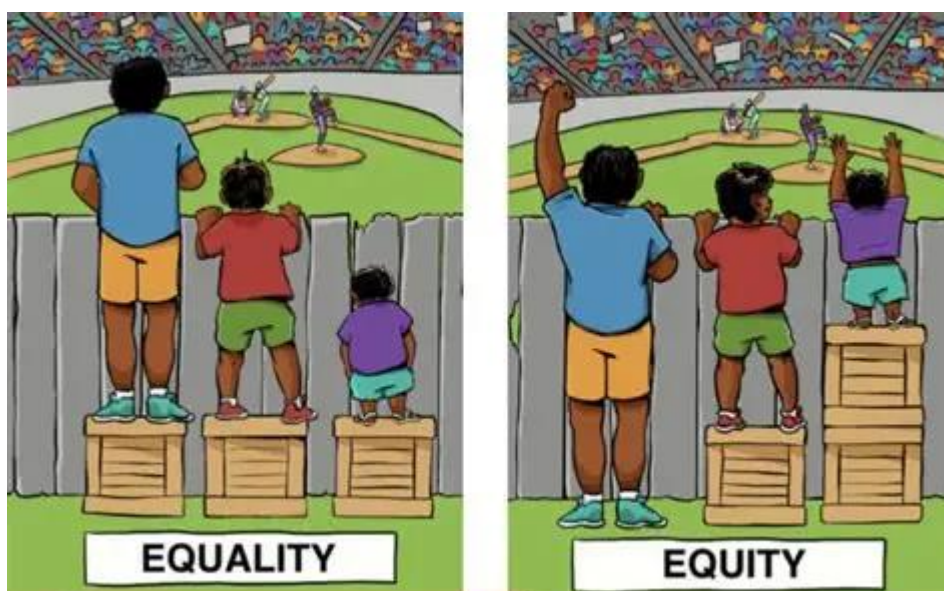
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Two Rivers Housing Reasonable Adjustment Policy

1 Introduction

- 1.1 Two Rivers Housing is a values driven organisation that believes in treating people with fairness and respect. Delivering services in a way that meet an individual's or family's needs is part of our commitment to equity of access. Our Reasonable Adjustment Policy is a response to this. The policy provides flexibility and confidence to help officers make bespoke decisions based on an individual's circumstances and enshrines our commitment to a 'human centric' service delivery culture.



2 Policy scope

- 2.1 This policy defines what a 'reasonable adjustment' is, in what type of circumstances we will make them, and how customers can request them.
- 2.2 Any reference to 'we', 'our', or 'us' means Two Rivers Housing.
- 2.3 This policy applies to all Two Rivers Housing customers and their household members. This includes general needs, temporary accommodation, shared owners, and leaseholders. The type of support we provide may depend on the type of tenancy or lease. It sets the policy context, expected cultural norms and approaches that officers should adopt when delivering front line services.
- 2.4 The policy should be read alongside other relevant policies, for example, where there is a risk of harm, abuse, or neglect to tenants or customers, we will follow our

[Safeguarding Children and At-Risk Adults Policy](#) and [Domestic Abuse Policy](#), where necessary.

2.5 We also have a duty in relevant instances to undertake adaptations to tenants' homes. Our [Aids and Adaptations Policy](#) sets out how we will provide adaptations to help household members to continue 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.

2.6 This policy is in accordance with:

- The Housing Ombudsman Service's Complaints Handling Code
- Our duty under the Equality Act 2010
- Social Housing Regulator Consumer Standards
- Our requirements under the Financial Conduct Authority (FCA) and in particular Principle 6 of the FCA Handbook.

3 Policy statement

3.1 Two Rivers Housing is committed to taking action to ensure that customers with protected characteristics and/or additional needs are not disadvantaged when accessing our services and are able to live well in their homes. Two Rivers Housing celebrates inclusivity and diversity and welcomes all opportunities to accommodate the needs of our customers. This policy describes our approach to making reasonable adjustments and should be read alongside our Disabled Adaptation Policy.

3.2 This policy sets out:

- how we will carry out our legal obligation under the Equality Act 2010 to make reasonable adjustments for people with protected characteristics. We are committed to ensuring all our customers have equal access to our services whatever their circumstances. One of the ways we do this is through reasonable adjustments, which remove barriers or reduce any disadvantage.
- how we will make reasonable adjustments for people with additional needs (people who do not have a protected characteristic, but who may have a condition or life circumstance that means that they may need an adjustment) to be able to access our services and live well in their home.

3.3 In our approach to making reasonable adjustments, we will work with support workers, advocates, family members or other professionals with a disclosure authority, to meet the needs of our customers and ensure any necessary support is put in place.

4 What is a reasonable adjustment?

- 4.1 A reasonable adjustment involves making a change to the way we usually do things to make sure that our services are accessible, and equitable opportunity is available to all our customers. These adjustments may come in a variety of forms such as a physical alteration to our properties, changes or updates to our policies, procedures or ways services are operated or adjusting how we communicate with customers to meet their specific needs.
- 4.2 When providing a specific adjustment for an individual customer, we will discuss and confirm this with the customer or their representative to avoid making incorrect assumptions about a person's needs.
- 4.3 We will try to agree a reasonable adjustment with minimal delay. In some cases, we may need to consider the request in more detail.
- 4.4 Where we are unable to make a reasonable adjustment due to cost or resources, we will work with the customer to find the best alternative solution for them.
- 4.5 Where a reasonable adjustment is complex, costly, and/or the impact is uncertain, the decision will be referred to the Head of the relevant department.

5 Examples of reasonable adjustments

- 5.1 The reasonable adjustments Two Rivers Housing will make will vary depending on the needs of the customer and the situation. It is 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 customers.
 - Providing information in alternative formats, for example in large print or Braille.
 - Offering interpretation through Language Line where a customer does not speak English.
 - 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.
 - Providing or referring for additional support for an ASB perpetrator with mental health issues.
 - Prioritising repairs according to urgency and consideration of known disabilities, additional needs or vulnerabilities.
- 5.2 Where a customer requests to move to alternative accommodation, we will refer them to the Local Authority or transfer list. Management moves are only available to customers who are at risk of harm or serious injury from others as per our Allocations Policy.

6 Our legal duties

- 6.1 Housing associations are classed as **service providers** for the purposes of the Equality Act 2010, as we offer, goods, facilities and services to the public.
- 6.2 Under the Act, an individual is protected from unlawful discrimination under the terms of the Equality Act 2010 if, it can be proven that they have been subjected to unequal treatment due to their age, race, gender, marital status, sexual orientation, disability, gender reassignment, religious beliefs, pregnancy or maternity.
- 6.3 Examples where claims could be brought against housing associations include failure to provide reasonable adjustments for people who are disabled resulting in ‘a substantial or long-term adverse effect on their ability to carry out normal day-to-day activities’.
- 6.4 We therefore have a duty to make ‘reasonable’ adjustments in the way we carry out our functions if, for example, a disabled person would be put at a substantial disadvantage compared to someone who does not have a disability. A substantial disadvantage is one which is more than minor or trivial.
- 6.5 The Equality Act 2010 doesn’t describe what is reasonable, but a [Code of Practice](#) published by the Equality and Human Rights Commission makes clear that it depends on factors such as:
- the effectiveness of the adjustment in preventing the disadvantage,
 - the extent to which it is practical to make the adjustment,
 - the cost of the adjustment and availability of resources, including external assistance and finance,
 - the extent of any disruption, which the adjustment would cause.
- 6.6 The Equality Act 2010 also does not provide a set list of reasonable adjustments, as the adjustment will depend on the needs of different customers and the nature of the service provider. However, the Code of Practice explains the kind of adjustments that could be made.
- 6.7 The duty is anticipatory. This means a service provider cannot wait until a person with a disability wants to use the service. They must think in advance and on an ongoing basis about what people with a range of impairments such as people who have a visual or hearing impairment, a mobility impairment, or a learning disability, might reasonably need.

7 How we will identify if we need to make a reasonable adjustment for our customers.

- 7.1 Effective communication and building trust is key to enacting this policy successfully.
- 7.2 Details of our policy and our commitment to providing reasonable adjustments will be clearly available through our various communication channels.
- 7.3 Customers will be asked whether they, or any household members, have any additional needs when they join Two Rivers Housing as a new tenant, leaseholder, or shared owner.
- 7.4 During any type of contact, colleagues will enquire about a customer's or household member's needs and customers are encouraged to share these needs whenever possible.
- 7.5 We will provide training on our reasonable adjustments approach to our colleagues and expect them and third-party contractors to anticipate additional needs a customer or household 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 customer records.
- 7.6 We will regularly update our partners on our approach through meetings and information sharing sessions.
- 7.7 A reasonable adjustment can be requested from us in the following ways:
- By the customer themselves.
 - By referral from a local authority or other relevant agency.
 - By a family member when we have been given permission for them to do so, or;
 - A member of staff who may suggest for one to be made, when they are aware it will support the customer's needs.
- 7.8 In some cases, we may seek advice from experts that can assist with signposting and other forms of support.
- 7.9 Where a customer is unhappy about a decision which has been made about a reasonable adjustment request, they can make a complaint as per the Two Rivers Housing Complaints Policy.
- 7.10 The following areas will be considered when assessing our approach to service delivery to ensure we adopt a reasonable adjustments approach when needed:

Protected characteristics – 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.

Neurodiversity – natural variations in the way the way the brain works, including autism, ADHD, dyslexia, dyspraxia, dyscalculia, and Tourette's.

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.

7.11 Other indicators that may inform our approach to offering a reasonable adjustment include:

- Repeated anti-social behaviour instances.
- 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 lead to 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.

7.12 In addition to applying a reasonable adjustment approach, any safeguarding concerns will be raised with the relevant local authority in line with our Safeguarding Policy. This sets out how we will identify and support vulnerable adults and children at risk and ensures statutory agencies are involved immediately when there is a concern.

8 Keeping record of customers' needs

8.1 We will record any known disability, additional needs, or vulnerability on customer records. This will be in line with our GDPR policies and processes. This will include any communication or access needs and whether there is anyone with delegated authority to speak to us on the customer's behalf.

8.2 We will use 'flags' on our customer database which alert staff to the relevant disabilities, additional needs or vulnerability of that household. Two Rivers Housing

will use this information to deliver services that meet their needs wherever possible, and access appropriate support.

- 8.3 The relevant colleagues will receive training on recording customer needs and how to use that information appropriately to adapt Two Rivers Housing services as required.
- 8.4 We will review this data periodically to ensure its accurate and up to date.
- 8.5 We will keep a record of any reasonable adjustments undertaken to ensure that the policy has been adopted effectively.

9 Information sharing

- 9.1 We are permitted to share information with an appropriate agency where there are overriding and serious concerns about the risk to an individual's health or personal safety. The law allows us to disclose information to, and request information from, relevant authorities where it works towards reducing crime and anti-social behaviour.
- 9.2 We will communicate information about a customer's or household members disability, additional needs, or vulnerability to our contractors whenever necessary to ensure services are delivered appropriately.
- 9.3 We will respect the wishes of the customers at risk in relation to what information should be shared, and with whom, where possible.
- 9.4 Colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the customer or required by law.