



Lumen Housing
Reasonable Adjustments Policy
June 2024

Document Information

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Objective	To provide an overview of how Lumen will provide reasonable adjustments to support customers with to access services.
Who Needs to Know?	All
Documentation	Lumen Customer Advocacy Policy
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Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By:
17.06.24	2	All	Full review and amendment to policy, to include advocacy.	Helen Binks

Amendment Notes

Documents at draft status are to use letter designations to denote issue status: a, b, c etc.

Documents at full issue status are to use number designations to denote issue status after full revision: 1.0, 2.0, 3.0, etc.

For an amendment to a full issue document you are to use number designation to denote issue status: 1.1, 1.2, 2.1, etc.

On full issue the draft amendment record should be deleted from the above table.

Notification of the amendment must be sent to the person maintaining the Central Register.

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1. VISION STATEMENT

Lumen Housing was established by Blackpool Housing Company for the benefit of the community. Our core objectives are to deliver high quality affordable homes aimed at meeting local housing need, and to contribute to the wider social and physical regeneration strategies in the area. We work in partnership with the Council and other Housing Associations to bring about lasting change to Blackpool's housing market.

Our mission: *To acquire poor quality properties and land assets so it may provide refurbished and new build homes delivered to a high standard and supported by high quality lettings and management services.*

2. INTRODUCTION

Lumen Housing is committed to ensure that people who have a disability are not in any way disadvantaged in accessing our services and we will therefore make reasonable adjustments to ensure our services are accessible for all.

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 for everybody that we deal with
- Sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people
- Sets out the factors that we will take into account in dealing with requests for reasonable adjustments.

This policy provides a general overview of our approach and outlines how we will respond to requests for reasonable adjustments from all our customers, as many of the arrangements we offer for people with a disability, can also be of benefit all our residents. For example, provision of documents in larger font, convening meeting at a venue suited to an individual's needs or providing information in an alternative language.

This policy applies to all Lumen Housing customers. A separate policy applies to staff members and applicants. Please also refer to the Lumen Customer Advocacy Policy.

3. THE EQUALITY ACT 2010

The Equality Act 2010 (the Act) is a legislative framework protecting the rights of individuals and ensuring the advancement of equality of opportunity for all. As a provider of services to the public and other public bodies Lumen Housing 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:

- Where 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



- 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 s2.212 (1) as ‘more than minor or trivial’

4. REQUESTING A REASONABLE ADJUSTMENT

We will publicise how our customers can request a reasonable adjustment in the following ways:

- On our website
- In our correspondence with our customers i.e. complaint form
- By asking whether a reasonable adjustment might be required when a customer contacts us.
- By including a note on our published documents indicating that we can provide the document in an alternative format on request
- By recording any required reasonable adjustments as part of a resident profiling exercise

5. TYPES OF REASONABLE ADJUSTMENTS 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 whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

Some examples of the adjustments that staff can make include:

- Provision of auxiliary aids
- Provision of information in appropriate alternative formats (eg large print, Braille, coloured paper etc)
- Extension of time limits (where it is lawful to do so)
- Use of email or telephone in preference to hard copy letters
- Use of plain English or Easy Read service
- Arranging a meeting in a suitable venue
- Rest or comfort breaks in meetings
- Communication through a representative or advocate (See Lumen’s Customer Advocacy Policy)



6. OUR RESPONSE TO REQUEST 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 a disabled person is experiencing or seek advice from expert disability organisations that can assist with signposting and other forms of support.

7. 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 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. 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.

Potential Disruption to Lumen Housing Service activities: For example, it would not usually be reasonable for a staff member to cease on all other work functions and 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.

8. 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 wiser steps that we can take to improve our services.

9. DEALING WITH COMPLAINTS

We are committed to provide accessible services for all that are 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.