Reasonable Adjustments for Customers Policy

1. Introduction

1.1 Peabody is committed to making sure that disabled customers and those with health conditions are not disadvantaged when accessing our services. This policy describes our approach to making reasonable adjustments to our services for disabled customers.

1.2 This policy does not intend to describe how we will approach every situation but describes the basic principles by which we will make reasonable adjustments for disabled people, and the factors that we will consider when evaluating requests.

1.3 This policy aims to ensure that:

- Disabled customers can access our services, as far as reasonably possible, in the same way non-disabled customers do
- Our colleagues understand our duty to make reasonable adjustments
- Our colleagues understand the types of adjustments they can make when delivering services to disabled customers
- We anticipate adjustments that disabled customers may require

1.4 This policy has links to some of our other policies, and we've thought about these links when reviewing the policy. This policy should be read alongside the:

- Complaints Policy
- Equality, Diversity and Inclusion Policy

2. Scope

2.1 This policy covers all customers of Peabody Group and all subsidiaries.

2.2 Reasonable adjustments for colleagues are covered by the Reasonable Adjustments for Colleagues Policy and Procedure.

3. Key terms and definitions

3.1 A **reasonable adjustment** involves making a change to the way we usually do things to make sure that our services are accessible and we are fair to all our customers. These adjustments may come in a variety of forms such as a physical alteration to our premises, changes to our policies, procedures or ways services are operated, or adjusting how we communicate with customers to meet their specific needs.

4. Our approach

How we decide if an adjustment is 'reasonable'

4.1 When considering whether an adjustment is reasonable, we will consider:

- The effectiveness of the adjustment in preventing or reducing the disadvantage for the disabled person. The adjustment should be designed to address the disadvantage as far as possible.
- The practicality of us making the adjustment
- The availability of our resources including external assistance and finance
- Any disruption to the service that making the adjustment may cause.

4.2 When providing a specific adjustment for an individual customer, we'll discuss and confirm this with the customer or their representative to avoid making incorrect assumptions about a person's needs. In cases where we can't meet a customer's preferred adjustment, we'll work with them to find the best solution.

How customers can request reasonable adjustments

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

4.4 Customers can request a reasonable adjustment from us by requesting the adjustment through a colleague they are communicating with, or by contacting our Customer Hub or subsidiary equivalent.

Examples of reasonable adjustments we offer

4.5 The adjustments we will make will vary depending on the needs of the customer 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 customers.

4.6 Examples of the reasonable adjustments our colleagues can consider making include:

- Providing information in alternative formats, for example in large print or Braille, as an audio file, or on coloured paper
- Giving customers more time to do something, if this is allowed by law. For example, we can be flexible with timescales we have set ourselves, such as asking customers to contact us within a certain amount of time to make a request or respond to something, but we can't change timescales set out in legislation, such as if a customer wants to ask for a review after receiving a notice of seeking possession.
- Adapting our communication method, for example if email or phone is preferred to hard copy letter
- Providing a sign language interpreter for Deaf customers who use British Sign Language (BSL) if it is necessary to communicate face to face
- Taking extra time and adapting communication methods, such as using visual aids, where a customer has a learning disability
- Providing extra breaks in meetings.

4.7 Our premises will be accessible to customers through:

- Where provided, making sure that our public office reception services are accessible to wheelchair users and have induction loops wherever possible
- Making sure that residents with mobility needs, including wheelchair users, are able to attend residents' meetings and that the selected venues also have accessible toilet facilities.

5. Legislation and Regulation

5.1 The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

5.2 That act requires us to provide reasonable adjustments in the provision of services to those who 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."

5.3 The duty is ‘anticipatory’ to disabled people in general as well as to individuals, so we must think in advance and anticipate what disabled people might reasonably need.

5.4 Under the Act, we have a legal duty to make reasonable adjustments 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.

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

5.6 The Regulator of Social Housing's Transparency, Influence and Accountability Standard requires us to provide choices, information and communication that are appropriate to the diverse needs of our customers, and to treat customers with fairness and respect.

5.7 The Housing Ombudsman's Complaint Handling Code requires us to have in place a reasonable adjustments policy that covers how we may adapt normal policies, procedures, or processes to accommodate an individual's needs.

6. Responsibilities

6.1 The Managing Directors and Care and Support Directors, or subsidiary equivalents, have overall accountability for this policy and implementation.

6.2 All customer-facing colleagues have a responsibility to follow the principles of this policy and take personal accountability for their own approach.

Approval

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Policy owner	Managing Director North East London