

Policy Title: Reasonable Adjustments Policy	
Author (Owner): Operations Director	Version: 1
Approved by: Executive Team	Date: April 2025
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1 Purpose

- 1.1 This policy outlines Soho Housing's commitment to making sure reasonable adjustments are made for residents while meeting the legislative and regulatory requirements to do so.
- 1.2 Soho wants to provide an inclusive service to all residents, and to achieve that, reasonable adjustments will need to be an integral part of how we interact with our residents and provide our services.

2 Scope

- 2.1 This policy sets out what a "reasonable adjustment" is and how arrangements can be made to make Soho Housing's services more accessible to all residents.
- 2.2 This policy should be read alongside policies and documents referred to in Section 7 of this document.

3 Principles

- 3.1 We are committed to ensuring that disabled residents, neurodiverse residents (neurodiversity refers to the different ways a person's brain processes information) and those with health conditions are not disadvantaged when accessing our services.
- 3.2 We are committed to being a supportive, diverse and inclusive organisation and will work with residents, support workers, advocates, family members and any other professionals with disclosure authority to meet the needs of our residents.
- 3.3 We recognise that our residents' individual needs and vulnerabilities will not remain static and may change over time depending on circumstances and the services we offer need to be adapted accordingly.
- 3.4 Where we identify a risk of harm, abuse or neglect to our residents, we will refer to the Safeguarding Policy.

4 Regulatory Requirements and Legal Duties

- 4.1 The Regulator of Social Housing's Consumer Standards requires registered landlords to:
 - Ensure tenants are safe in their homes.
 - Listen to tenants' complaints and respond promptly to put things right.
 - Be accountable to tenants and treat them with fairness and respect.
 - Know more about the condition of every home and the needs of the people

- who live in them.
- Collect and use data effectively across a range of areas, including repairs.

4.2 The Equality Act 2010 provides a legislative framework to protect the rights of individuals and to advance equality for all. The Act imposes a legal duty to make reasonable adjustments, arising in three circumstances:

- Where there is a provision, criterion or practice which puts people with disabilities at a substantial disadvantage¹ in relation to a relevant matter in comparison with people who are not disabled.
- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with people who are not disabled and/or,
- Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with people who are not disabled.

4.3 The Housing Ombudsman Service Complaint Handling Code 2024 states that landlords must consider their duties under the Equality Act 2010 and “anticipate the needs and reasonable adjustments of customers who may need to access the complaint process”.

4.4 The Data Protection Act 2018 and UK GDPR require us, as data controllers, to handle personal data with care, ensuring it is processed lawfully, fairly, and transparently. We must collect data for specific purposes, keep it accurate and up-to-date, and store it only as long as necessary. Additionally, we must protect data against unauthorised access and ensure its confidentiality. By adhering to these principles, we safeguard the privacy and security of information about the vulnerabilities of our residents and their household members, sharing it only when necessary and appropriate.

5 What is a “reasonable adjustment”?

- 5.1 A reasonable adjustment is designed to support our residents when they access our services as a housing provider, remove barriers and ensure all residents, irrespective of their circumstance, have equal access to the same services.
- 5.2 A reasonable adjustment involves making a change to the way we usually do things to ensure that our services are accessible, and we are fair to all our residents.
- 5.3 Many of the adjustments offered for vulnerable or disabled residents can be made available for those who do not have vulnerabilities or disabilities but require modifications to our services.
- 5.4 Adjustments and modifications to the physical properties of a property would be covered by the Aids and Adaptations Policy.

6 What we mean by “reasonable”?

- 6.1 The Equality Act 2010 does not define what is ‘reasonable’ but guidance from the Equality and Human Rights Commission suggests considering:
 - The effectiveness 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; and
 - Any disruption to the service that making the adjustment(s) may cause.
- 6.2 Where we are unable to make a reasonable adjustment, due to cost or resources, we will work together with our resident to find the best alternative solution for them.

7 How we define “vulnerability”

- 7.1 We may consider someone to be vulnerable where they are “an individual or household experiencing difficulties with everyday living” which could:
 - Affect their ability to successfully adhere to their conditions of tenancy without additional support.
 - Place them at risk in their home.
 - Affect how they access our services.
- 7.2 This does not mean everyone who meets the definition is vulnerable, but we will use it as a guideline when assessing the needs of our residents.
- 7.3 We recognise ‘vulnerability’ is not static and is a changeable state influenced by multiple factors such as age, disability, bereavement, mental health, domestic abuse, poverty, debt etc. This list is not exhaustive.

7.4 We are aware the word “vulnerable” can have limitations and stigma attached to it. However, we recognise there is a real need for all colleagues, contractors, and stakeholders to recognise vulnerable residents and the need for a bespoke response. Therefore, we continue to use the word vulnerable as a universally understood term.

7.5 We adopt the definition of a disability set out in the Equality Act 2010 which states a person is disabled if they have a physical or mental impairment, and the impairment has a substantial and long-term effect on their ability to carry out normal day to day activities.

8 Identifying vulnerability

8.1 We may identify a resident's vulnerability in the following ways:

- By asking the resident at the start of tenancy if they, or any household members, have any additional needs.
- Through regular periodic resident data checks.
- At significant tenancy events such as Sign Up, Tenancy Change request or Mutual Exchange.
- Via colleagues who identify vulnerabilities either through their own observations or via resident records.
- Via our colleagues and contractors working in a resident's property.
- Through partnership working with external agencies.

8.2 We expect our colleagues to recognise signs indicating vulnerability, such as:

- Anti-social behaviour (ASB) as a direct result of mental health conditions including being a victim of cuckooing.
- Those affected by ASB, Hate Crime or Domestic Abuse.
- A repeated failure by the resident to respond to any communication from us.
- Hoarding or self-neglect which results in the resident's home and/or garden being neglected, damaged or unfit for occupation.
- Sudden changes to rent payments and falling into arrears when historically the resident had a good payment history.

9 Communication

9.1 We recognise that communication is key when working with all our residents and we will ensure that all communication is empathetic and focussed on the individual. We will seek to remove all potential barriers and adjust how we communicate with our residents. A reasonable adjustment could be:

- Wherever possible, communicating via a method that best suits the resident (e.g. phone, email, text, letter, face to face).
- With consent, agree to communicate via a nominated contact.
- Allowing more time for residents to provide information that we need, where we are not restricted by legislation.
- Providing specialist equipment or additional support, such as a sign language interpreter for a workshop or event.
- Wherever possible, providing information in plain simple English, and other languages on request.
- Allowing more time to understand information and/ or make decisions (where it is lawful to do so).

- Recognising that not all our residents have digital access, and that digital exclusion could be a barrier to accessing services.
- Recognising there may be issues with literacy and adapting our contact methods accordingly.
- Not being reliant on a single method of contact.
- Recognising that traditional communication and contact methods, such as calling the contact centre, may cause trauma or trigger a resident and a more flexible approach may be required.

This list is not exhaustive.

10 Request a reasonable adjustment

10.1 A reasonable adjustment can be requested in the following ways:

- By the resident
- By a family member or a representative with delegated authority to discuss the resident's tenancy
- By a partner agency working with our resident
- By a colleague who identifies and recognises an adjustment would support a resident's individual needs

10.2 In some circumstances, to ensure we provide a comprehensive and tailored service, we may seek advice from our partner organisations for specialist support, advice and guidance. We recognise we are not always best placed, or sufficiently specialist, to meet resident needs and will often need a collaborative approach to respond to our resident's individual needs.

11 Our response

11.1 We will:

- Seek to understand the request and the reasons for this. We will consider the adjustment being requested to ensure this is the most appropriate adjustment or whether another adjustment may be more appropriate to meet and support the individual needs of the resident.
- In most cases, where possible, we will agree and deliver the required reasonable adjustment with minimal delay.
- In some cases, we may need to consider in more detail how best to overcome the difficulty our resident is experiencing or seek advice from our partner agencies that can assist with specialist advice and support.
- Take a person-centred approach and listen to the individual requirements of each resident.
- Encourage our residents to make their own choices and decisions about the services they want.

12 Keeping a record of residents' needs

- 12.1 We will record and flag any known vulnerability or disability our residents may have on our case management systems. This includes, but is not limited to, any communication or access needs and if there is anyone with delegated authority to speak on their behalf.
- 12.2 If a resident or household member is recorded as having a disability or vulnerability, wherever possible, we will use this information to tailor our services to meet their individual needs.
- 12.3 Our vulnerability and disability markers will be reviewed periodically to ensure the information stored is accurate and up to date. We recognise a resident's needs will not remain static and may change over time and they will need to keep us updated on their circumstances.
- 12.4 Upon request, we will make available to residents the markers flagged against them and the reasoning why it was added.
- 12.5 We will ensure our data capture processes are robust, fit for purpose and collect meaningful data which can support the individual needs of our residents.

13 Information sharing

- 13.1 The Data Protection Act 2018 and the General Data Protection Regulation (the Data Protection regime) allows sharing of information without the consent of the individual in a safeguarding context where certain conditions are met:
 - The public interest served outweighs the public interest served by protecting confidentiality.
 - There is a lawful basis to do so which includes 'safeguarding of children and individuals at risk' and sharing the information is necessary to protect an individual from neglect or physical, mental or emotional harm, or to protect the physical, mental, or emotional wellbeing of an individual.
- 13.2 Sharing of information must be necessary and shared only with those individuals and organisations particularly our repairs, servicing and improvements contractors, who need to have it, be accurate and up to date, be shared in a timely fashion, and be shared securely.
- 13.3 Records must be retained regarding the decision-making process around sharing information outside of Soho Housing. A record should be made of the information shared, with whom and for what purpose.

14 Training of colleagues

- 14.1 Induction for new colleagues will include information on all relevant policies and procedures, including recording, refreshing and updating resident vulnerabilities on our systems.

15 Complaints

- 15.1 We aim to meet the needs of our residents by providing an excellent service. However, it is acknowledged that occasionally things go wrong, and residents may wish to complain. Should the need arise to make a complaint, please refer to our Complaints Policy.

16 Equality and Diversity Impact

- 16.1 Soho Housing is committed to equality, diversity and inclusion and will ensure that this policy is applied fairly and consistently.
- 16.2 We will act sensitively towards the diverse needs of individuals and communities and will take positive action or make appropriate adjustments where required. We will not directly, or indirectly, discriminate against any person or group of people in line with our Diversity, Inclusion and Equality Policy.

17 Related Documents and Policies

- 17.1 This policy should be read alongside the following policies and documents:
- Reasonable Adjustments Procedure
 - Safeguarding Policy and Procedure
 - Aids and Adaptations Policy and Procedure
 - Housing Ombudsman Service - Complaint Handling Code 2024
 - Equality Act 2010
 - Human Rights Act 1998
 - Housing Act 2004
 - Social Housing (Regulation) Act 2023
 - Care Act 2014
 - Regulator of Social Housing - Consumer Standards
 - Aids and Adaptations Policy
 - Equality, Diversity and Inclusion Policy
 - Anti-Social Behaviour (ASB) Policy and Procedure

18 Policy Review and Version Control

- 18.1 This policy will be reviewed every three years, or sooner if there is any legislative or regulatory change, or other reason to review this policy sooner.

Version number: 1
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Version	Type of Change	Date	Revisions from previous issue	Approved By
1	New policy	April 2025	Not applicable	ET