



BURY HOUSING SERVICES REASONABLE ADJUSTMENTS POLICY

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1. PURPOSE

Bury Housing Services is committed to ensuring that disabled individuals or those with other vulnerabilities are not disadvantaged in accessing our services. This policy provides guidance on meeting individual needs under the Equality Act 2010, particularly the duty to make reasonable adjustments for disabled individuals. It aligns with our Equality, Diversity, and Inclusion Framework, while ensuring high standards of customer service and tenant satisfaction. This policy incorporates current standards in data protection and tailored service delivery

This policy does not provide an exhaustive guide to all situations but aims to:

- Confirm our commitment to improving accessibility for all tenants.
- Set out principles for providing reasonable adjustments to those who need them.
- Outline factors considered when responding to adjustment requests.
- Explain how tenants may appeal decisions if dissatisfied with the arrangements provided.

2. SCOPE / LEGAL REQUIREMENTS

As a public service provider, Bury Housing Services has a legal duty to ensure that disabled tenants are not placed at a substantial disadvantage when accessing services.

This policy integrates compliance with:

- Equality Act 2010 (Reasonable Adjustments).
- GDPR (General Data Protection Regulation) and Data Protection Act 2018 for tenant data handling.
- Housing Act 1985 (Secure Tenants' Rights).
- Regulator of Social Housing Standards.
- Human Rights Act 1998 (Rights to dignity and suitable accommodation).

Under the Equality Act 2010, duties to make reasonable adjustments include:

1. Modifying policies, procedures, or practices.
2. Addressing physical features that disadvantage disabled tenants.
3. Providing auxiliary aids or services to prevent substantial disadvantages.
4. Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as ***'more than minor or trivial'***

This policy should be read in conjunction with our Vulnerability Policy, which sets out how we identify, assess, and respond to vulnerability. Where a tenant is identified as vulnerable, consideration will be given to whether reasonable adjustments are required to ensure they can access services fairly.

3. WHAT IS A REASONABLE ADJUSTMENT?

A Reasonable Adjustment is any change to practices, policies, or physical premises that alleviates a substantial disadvantage for disabled individuals. Adjustments must be assessed

case-by-case. The Equality Act's Code of Practice suggests that, when deciding whether an adjustment is reasonable, the following issues should be considered:

- Effectiveness in reducing the disadvantage.
- Practicality of implementing the adjustment.
- Financial costs and alternatives available (e.g., standard aids or adaptations).
- Disruption to other services or tenants.
- Availability of financial or other assistance (e.g., grants).

All decisions will be made on a case-by-case basis and will be proportionate, evidence-based, and clearly recorded. Consideration will be given to the individual's needs, the effectiveness of the proposed adjustment, and the impact on service delivery.

4. ADJUSTMENTS THAT WILL BE CONSIDERED

Bury Housing Services is committed to making tailored services available to those defined under the Equality Act as having physical or mental impairments with substantial, long-term impacts on daily activities. Our approach should ensure it supports all tenants who meet the definition of disability under the Equality Act 2010:

“If he or she has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities (S6(1))”

Whilst it is not possible to list all such circumstances, below is a list of some examples:

- Providing support for tenants with communication or learning difficulties.
- Offering tailored housing adaptations for physical or emotional impairments (e.g., ramps, sensory aids, or mental health support services).
- Where appropriate, we will provide translation or interpretation services as part of our wider commitment to accessible services.
- Collaborating with external agencies for mental health and disability services.
- Providing additional support for tenants with sensory impairments, such as those which affect sight or hearing
- Providing additional support for tenants with literacy problems.

5. REQUESTING A REASONABLE ADJUSTMENT

Bury Housing Services will ensure that tenants are aware that reasonable adjustments can be requested.

Requests for reasonable adjustments can be made in the following ways:

- Directly by the tenant, either in person, by telephone, or through digital services.
- By a representative, advocate, or family member where consent has been provided.
- By staff identifying a need during interactions with the tenant.
- Through referrals from external agencies or support organisations.

We will take a proactive approach and may suggest reasonable adjustments where we identify that a tenant may benefit from additional support.

We will not require unnecessary evidence where the need for an adjustment is clear. Where appropriate, we may request additional information to ensure that any adjustment is suitable and effective.

6. GUIDANCE

Staff should:

- **Ask, Don't Assume:** Disabilities or vulnerabilities are not always visible. Routinely ask tenants if additional support is needed.
- **Listen and Respond:** Most tenants will articulate their needs. Aim to meet requests when reasonable.
- **Be Flexible:** Needs may vary significantly, even among individuals with similar conditions.
- **Be accountable:** It is everyone's responsibility to record reasonable adjustments accurately in the CRM system and to review them regularly with tenants when delivering services.

7. MONITORING

Reasonable adjustments will be recorded and monitored to assess their effectiveness. Data insights from these adjustments will be used to refine service delivery and report compliance with GDPR requirements.

8. APPEAL

Tenants dissatisfied with adjustment decisions can use the complaints process outlined on our website. Appeals may involve consultation with disability advocacy groups or legal advisors to ensure fair outcomes.

Our Complaints policy can be viewed by visiting the complaints section on our website.

If tenants remain dissatisfied following completion of the complaints process, they may refer the matter to the Housing Ombudsman Service.

9. WORKING WITH CONTRACTORS AND PARTNERS

To ensure effective implementation of adjustments, we work closely with contractors and local partners:

- Contractors must comply with our accessibility and inclusion standards in all service agreements. We will monitor this as part of contract management.
- Regular data sharing (in compliance with GDPR) ensures tailored services for tenants.
- Joint planning with health and social care partners reinforces a holistic approach.

10. REVIEW

This policy will be reviewed every three years to ensure it remains up to date and continues to meet legal, regulatory, and service requirements. An earlier review may be undertaken if there are significant changes in legislation, regulatory standards, or organisational priorities,

or where monitoring and feedback indicate that changes are required.

APPROVAL AND REVIEW

Document owner: Claire Rogan	Head of Performance Improvement and Assurance
Leadership Team Meeting – Director of Housing	Date approved 15/6/2026
Review frequency	3 years

