

Reasonable Adjustments Policy

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Contents

		Page
1.	What this policy is about and why we need it	1
2.	Who does this policy apply to	1
3.	Our policy is...	1
4.	How we will monitor this policy	5
5.	Links to other policies, legislation and regulations	5
6.	When will this policy be reviewed	6
7.	Jargon Buster	6
8.	Appendices	6

1. What this policy is about and why we need it.

1.1 This policy relates to Acis Group's duty under any relevant legislation (for example the Equality Act 2010 and any subsequent amendments) (the Acts) to make reasonable adjustments - a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability. We need this policy to ensure compliance with the Acts.

1.2 Under the Equality Act, the legal duty to make reasonable adjustments arises in three circumstances:

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

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

2. Who does this policy apply to?

2.1 This policy applies to all Acis Group people, Board Members, and all Acis Customers. It is expected that any contractor working for the company will have their own policies to support compliance with Equality Acts requirements.

Specific responsibilities are as follows:

- Acis Group's Board and Executive Leadership Team (ELT) have responsibility for the oversight and implementation of this policy.
- Acis Group's Senior Management Team (SMT) are responsible for ensuring that operational services are delivered in accordance with this policy.
- Whilst the Board, ELT, and SMT will take lead responsibilities, our people will have a clear awareness of the policy and work to raise awareness of it with our customers.

3. OUR POLICY

3.1 Acis Group is committed to ensuring that a person with a disability is not disadvantaged in accessing its services or in their work at Acis Group. To this end, we will make reasonable adjustments for a person with a disability. Our policy:

- Confirms our commitment to improving accessibility to our services and providing reasonable adjustments for people with a disability.

- Sets out how we will let customers know that we can provide reasonable adjustments, types of reasonable adjustment, and how we will respond to requests for reasonable adjustments.
- Sets out how employees can raise any requests for reasonable adjustments, and how we will respond to any requests for reasonable adjustments.

3.2 Providing reasonable adjustments

3.2.1 We will let customers know that we can provide reasonable adjustments in the following ways:

- By publishing this policy on our website
- By asking whether a reasonable adjustment might be required through any appropriate method.
- By including information in any written communications
- By including a note in our published documents indicating that we can provide the document in an alternative format on request

3.2.2 We will let our employees with a disability know that we will consider, and could provide reasonable adjustments, in the following ways:

- By publishing this policy on our intranet
- By asking during recruitment stage whether a reasonable adjustment might be required through any appropriate method.
- By considering if reasonable adjustments are necessary after a period of sickness or changes to health.

3.3 Types of reasonable adjustment

3.3.1 There is no prescribed list of reasonable adjustments - they will depend on individual needs. We will discuss the requirements with the customer or employee concerned and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a person with a disability requires any reasonable adjustments, or about what those adjustments should be.

3.3.2 Some examples of the adjustments that we can make for customers include:

- Provision of information in appropriate alternative formats (e.g. large print, Braille)
- Use of email or telephone in preference to hard copy letters
- Communication through a representative or intermediary
- Rest or comfort breaks in meetings

- The use of interpreters
- The provision of an auxiliary aid

3.3.3 The above list is not exhaustive, and consideration will be given to the use of different services and auxiliary aids as requirements are identified.

3.4 Our response to requests for reasonable adjustments

3.4.1 We aim to be able to agree and deliver the required reasonable adjustment(s), and with a minimum of delay in the majority of cases. In some cases, we recognise that we may need to consider in more detail how best to overcome the difficulty a person with a disability is experiencing or seek advice from relevant organisations that can assist with signposting and/or other forms of support.

3.5 How will we decide what is reasonable?

3.5.1 The Acts do not define what is 'reasonable' but guidance from the Equality and Human Rights Commission suggests that the most relevant factors are those set out below, to which Acis Group will have full regard:

- **The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability**

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 a person with a disability if there are other requirements that need to be overcome such as the customer also having a hearing impairment.

- **The practicality of making the adjustments**

For example, it may not be possible for us to provide additional time to customers if there are statutory deadlines to meet, or the aid being suggested for a Customer within our learning provision may not be suitable within our health and safety provisions or requirements.

- **The availability of our resources including external assistance and finance**

For an adjustment to be reasonable, it should be effective. However, it is important to remember that 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 employees 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. Provisions already made for customers such as within the SEN Framework will also be taken into consideration.

- **Any disruption to the service that making the adjustment may cause**

For example, it would not usually be reasonable for one of our people to

cease other work and devote all their time to one customer as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

4. How we will monitor this policy

- 4.1 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 wider steps that we can take to improve our services.

5. Links to other policies, legislation and/or regulations

- 5.1 Policies, legislation and/or regulation that links to this Policy are listed below:

- Equality, Diversity & Inclusion Policy
- Aids and Adaptations Policy
- Equality Act 2010
- Flexible Working Policy
- EHCP Procedure
- Regulatory Framework for Social Housing in England: Tenant Involvement and Empowerment Standard.
- SEND Code of Practise 2015

6. When this policy will be reviewed

- 6.1 This policy will be reviewed by March 2027

7. Jargon buster

Reference	Definition
Reasonable Adjustment	to avoid as far as possible by reasonable means the disadvantage which a disabled person may experience because of their disability.
Substantial Disadvantage	A detriment that is more than trivial
Customers	All customers of Acis Group including, but not limited to, tenants, learners, students

8. Appendices

None