



# **Castle Point Borough Council Housing Reasonable Adjustments Policy**

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# Housing Reasonable Adjustments Policy

## 1. Purpose

- 1.1. This Policy sets out Castle Point Borough Council (CPBC)'s approach to making reasonable adjustments for disabled people that are at a substantial disadvantage compared to someone that does not have a disability.
- 1.2. While this Policy is intended to support the Council's Housing Complaints Policy, it can be applied to other services we provide.

## 2. Scope

- 2.1. This Policy does not set out how we will approach every situation but is intended to set out a general statement to confirm our commitment to improving accessibility for all those we deal with. We will identify vulnerability on a case-by-case basis and set out some of the reasonable adjustments we can make and when.

## 3. Related Documents

- Complaints Process 2025
- Council Housing Complaints Policy 2025
- Compensation Policy 2025
- Unacceptable Behaviour Policy 2024

## 4. Definitions

- 4.1 The Equality Act 2010 requires us to provide reasonable adjustments for people who are disabled. Under section 20 of the Act people who have a 'physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities'.
- 4.2 The Council acknowledge and understand that having a disability does not automatically mean a person is vulnerable. Equally, not all those who are vulnerable have a disability. Vulnerability may be caused by personal circumstances, timing and/or whether there is existing support in place.
- 4.3 The following indicators may mean a person could have additional needs and all staff should check if the person needs extra help or support:
  - **Protected characteristics** - age, disability, gender reassignment, marital status, pregnancy, race, religion, sex and sexual orientation.
  - **Health and abilities** - physical impairment, sensory impairment, cognitive impairment, mental health issues, serious illness, developmental condition and addiction.
  - **Access and skills** - language barriers, literacy, numeracy, digital access, and technical skills.
  - **Personal circumstances** - bereavement, redundancy, loss of income, relationship breakdown, victim of domestic abuse, anti-social behaviour or harassment.
  - **Financial** - lack of budgeting skills/financial literacy, other debts, low or unstable income.

- 4.4 There are also a range of behaviours that may suggest further support or assistance should be considered. These include:
- Lack of engagement when contacted by the Council.
  - Causing anti-social behaviour as a result of mental health issues.
  - Hoarding, self-neglect or other behaviours that could cause harm to themselves or their home.

## **5. Background / Context / Introduction**

- 5.1 Under the Equality Act 2010 there is a legal duty to make reasonable adjustments 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.
  - A physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
  - A disabled person would, but for the provision of an auxiliary aid be put at a substantial disadvantage with persons who are not disabled.
- 5.2 While the Act does not define what is 'reasonable', guidance from the Equality and Humans Rights Commission suggests the most relevant factors are:
- The effectiveness of adjustments in preventing or reducing the disadvantage.
  - The practicality of making the adjustment.
  - The availability of resources including external assistance and finance.
  - Any disruption to the service that making the adjustment may cause.

## **6. Policy Content**

- 6.1 This Policy sets out how the Council will support those with vulnerable needs and our commitment to improving accessibility for all that we deal with, setting out some of the basic principles of our commitment to provide reasonable adjustments for disabled people and setting out the factors the Council will take into account when considering requests for reasonable adjustments.
- 6.2 The Council define vulnerable needs as having a condition or circumstance that may:
- Place someone at risk in their home.
  - Puts them at risk of being unable to comply with the conditions of their tenancy without additional support or intervention.
  - Affects their ability to access our services.
- 6.3 A request for a reasonable adjustment can be received in the following ways:
- By the individual.
  - The local authority or other relevant agency.
  - By a family member, friend or advocate.
  - A member of staff.

- 6.4 The Council will consider a request for a reasonable adjustment upon receipt and seek to respond with the minimum delay. However, in some circumstances we may need to consider in more detail how best to overcome the difficulty a disabled person is experiencing and/or seek advice from an expert disability organisation.
- 6.5 In these circumstances we will advise the person making the request of the expected delay and if appropriate signpost them to a specialist agency for more support.
- 6.6 There is no prescribed list of reasonable adjustments as they will depend on the individual's needs. We will discuss the requirements and possible reasonable adjustments with the person concerned, to reach an agreement on what may be reasonable in the circumstances.
- 6.7 Reasonable adjustments can include the following:
- Providing correspondence in alternative formats, such as larger print.
  - Allowing more time to provide further information or comments on a complaint.
  - Use of preferred method of communication, such as email, telephone or in person.
  - Providing a single point of contact.
  - Providing an interpreter.
  - Communication through a representative or advocate.
  - Offering a home visit or meeting in the Council offices.
- 6.8 There may be circumstances where we decide not to meet a request for a reasonable adjustment. The law says that an adjustment only has to be made if it is 'reasonable'. We will take into account the cost or resource implications of making the adjustment and whether the request itself is reasonable.
- 6.9 Where it is difficult to provide the adjustment or meeting it would interfere with the Council's ability to meet their legal and regulatory obligations, we may decide it is not reasonable. On these occasions we will explain why.

## **7. Communications & Training**

- 7.1. All customer facing staff must be trained and aware of when we should consider making a reasonable adjustment to our services.
- 7.2. The Council will publish this Policy on our website and include a statement that invites people to contact us if they need us to adapt the way we communicate with them.

## **8. Records, Reporting and Monitoring**

- 8.1. Vulnerabilities and disabilities that we are made aware of will be recorded against the person on our Housing Management System.
- 8.2. The Complaints Monitoring Spreadsheet will be used to record when a reasonable adjustment has been made relating to a complaint.

## **9. Review**

- 9.1. This Policy will be reviewed in one year from issue or earlier if there is a change in legislative or regulatory requirements.