

1. Background and objectives

- 1.1. At Alliance Homes we know that some customers may need changes to the way we deliver our services so they can access them fairly. This may be for a short time or permanently.
- 1.2. This policy applies to Alliance Homes residents, leaseholders, licensees, shared owners, and those receiving support services who may not be tenants. It provides guidance for colleagues and contractors and explains who might need extra help and how we provide it. A customer friendly summary of this policy is on the website.
- 1.3. There are legal and regulatory codes which all housing providers must follow. Links to these are in Appendix A. Where vulnerability or protected characteristics are present, key regulations include:
 - The Equality Act 2010
 - The Regulator for Social Housing's Transparency, Influence and Accountability Standard [2024].
 - The Housing Ombudsman's Complaints Handling Code 2024
 - Human Rights Act 1998 – Article 14.

2. Policy detail

2.1 Reasonable Adjustments

Alliance Homes defines those who may need a reasonable adjustment as:

Individuals over 18yrs with a temporary or permanent reduction in ability, or resilience, due to their physical / mental health or a life event which prevents them from being able to manage their tenancy without additional adjustments or support.

In summary, this means adults who need extra support due to their health or life circumstances, either for a short time or permanently.

Identifying the need for reasonable adjustments

- 2.2 A customer's need for an adjustment can be identified any time, for example at tenancy sign-up, during a call with our contact team, or by any colleague or contractor.
- 2.3 Signs which may mean a different approach is needed could include:
 - Falling into rent arrears or other debt
 - Problems maintaining a tenancy
 - Being a victim or the cause of anti-social behaviour

- Disputes with neighbours
- Changes to appearance and / or poor hygiene
- Not replying to letters or answering the door or phone
- Self-neglect, hoarding, or where the home or garden become damaged, neglected or unfit to live in.

Factors defining vulnerability

Below are some indicators that may help when considering the need for a reasonable adjustment.

Factor 1: Underlying characteristics

People in these groups may not need adjustments or additional support just because of the characteristic.

- Frail older people
- 16–21-year-olds
- Those with a physical or sensory disability
- Care Leavers
- Younger Lone Parents [under 21 years]
- Refugee or asylum seekers
- Carers
- Families with disabled children
- Those living with a terminal illness.

Factor 2: Ability to act, engage or cope

People may lack ability due to one or more of these factors

- Learning disability
- Mental Illness
- Autism Spectrum Disorder, ADHD or other neurodivergent conditions Neurodivergent conditions: A guide to understanding differences
- Poor mobility or frailty
- Chronic health conditions
- Addiction - substance or alcohol abuse
- Poor literacy or low / no English language skills
- Age related conditions that impact on independent living
- Lack of capacity to make decisions [under the Mental Capacity Act 2005].

Factor 3: Exceptional life event

People may have experienced a traumatic event. For example:

- A history of homelessness or living in a refuge or hostel
- A move from supported housing to independent living
- Bereavement
- Sexual or racial abuse, serious harassment or hate crime
- Experience of domestic violence
- Recent discharge from hospital
- A period of physical or mental illness
- Multiple debts and unable to meet basic needs e.g. heating or eating
- Pregnancy
- Families with excluded children
- Ex-service personnel returning from conflict.

- 2.4 We will not assume extra support is needed, this will be decided on a person-by-person basis.
- 2.5 Examples of reasonable adjustments made by Alliance Teams are located at the end of this policy. If there is doubt over the need for an adjustment or a solution, speak to a colleague, or your manager for advice

Recording

- 2.6 We record known protected characteristics and additional needs on our housing system, so we know what adjustments are needed to provide a fair service – this is the responsibility of all customer facing colleagues.
- 2.7 Guidance on how to record protected characteristics or adjustments is here: [Uploader.ashx](#)
- 2.8 We review customer needs before making contact so any adjustments can be applied and also during routine customer contact, so that we don't assume the adjustment is ongoing.
- 2.9 Where safeguarding adults or children concerns arise, these must be recorded and reported to the relevant local authority in line with the Safeguarding Policy.

Reasonable adjustments

- 2.10 We acknowledge our duty under the Equality Act 2010. The Act doesn't spell out what a 'reasonable adjustment' is, but the Human Rights Commission advises taking account of the following:

- How effective an adjustment will be in avoiding disadvantage for the customer
- The practicality of the adjustment
- The amount of disruption the adjustment may cause
- The cost of making the adjustment
- The amount of support already in place
- The availability of other financial support or assistance

2.11 We may change the way we usually do things if it places a customer at substantial disadvantage. For example, we can:

- Allow more time for a customer to reply
- Allow someone to speak on behalf of the customer
- Provide information in large print, braille or digital formats
- Ensure our offices don't present obstacles by offering accessible meeting rooms, lift access or offer of other locations
- Offer translation and interpretation and language line services
- Provide information and leaflets in other languages
- Communicate using preferred methods [email, post, webchat, portal, in-person].

2.12 Where adjustments are about the structure of the home, the relevant policy e.g. adaptation policy or decant procedure will be followed [a decant is when Alliance moves a customer temporarily to allow for essential works].

How our services will apply this policy

Alliance Contact Team [ACT]

ACT are often the first point of contact for customers calling with general enquiries or to report a repair.

2.13 When customers contact us, we ask if there are needs that we need to be aware of and if they have changed.

2.14 All reasonable adjustments are recorded on the housing system.

Lettings

2.15 When letting homes, customers can tell us about their needs. This helps us ensure that an offer of housing is right for the individual and their family. See Alliance Homes Lettings policy.

- 2.16 Having an additional need does not override our expectation that customers should be able to understand and meet their tenancy / contractual responsibilities, as not doing so places the tenancy at risk.
- 2.17 Referrals for resettlement support, or to other support services helps ensure long term tenancy sustainment.
- 2.18 A 'settling in' contact is attempted for new residents at 28 days which provides a further opportunity to identify additional needs.

Home Repairs

- 2.19 Residents with additional needs may find it harder to cope if something goes wrong in their home. When a repair is reported the contact centre check to see if there are disabilities, access arrangements or support needs that should be considered. Repairs are prioritised according to urgency and consideration of known vulnerabilities and needs. See Alliance Homes Repairs, maintenance and improvement policy.
- 2.20 Aids and adaptations may be requested to support needs arising from protected characteristics and/or a vulnerability. These may be minor e.g. a grab rail, or more major alterations, requiring temporary move for work to be carried out. See Alliance Homes Adaptations policy and Decant procedure.

Rent Arrears and Financial Inclusion

- 2.21 Paying rent / service charges regularly are a tenancy responsibility. However, we recognise that poverty and debt and not being able to pay can be due to a vulnerability.
- 2.22 Our Income team operates an early debt prevention approach, and they work proactively and sensitively with customers to improve their financial circumstances.
- 2.23 We fully consider a customer's circumstances in full before deciding on any enforcement action for rent arrears. See Alliance Homes Rent Arrears procedure.

Community Safety

- 2.24 Some residents may behave in an anti-social way, and we try to work with those responsible for anti-social behaviour before taking any tenancy enforcement action.
- 2.25 We investigate all reports of anti-social behaviour, criminal or otherwise. Where these include domestic abuse, hate crime or harassment we work closely with the police and other appropriate agencies to support those who are victimised or taken advantage of due to a protected characteristic or additional need.
- 2.26 We balance the safety and wellbeing of victims, neighbouring residents and perpetrators before deciding the best course of action for community safety. See Alliance Homes Anti-social behaviour policy.

Customer Engagement

2.27 We support customers to be involved and to have the opportunity to influence and review our strategies, policies and services. The customer engagement Accessibility and Equality Impact Assessment includes the views of customer and colleague Equality Champions. Our Customer Scrutiny Panel, and other forums, including our on-line group, Hive, give their views about how our services are delivered and we tell them how their views have been considered.

Case Conferences

- 2.28 For complex customer cases, we hold monthly internal case conferences to agree the best way to support customers to manage their tenancy. Where colleagues, or managers require advice on whether an adjustment can be made, this group can provide advice and support
- 2.29 We attend multi-agency risk management meetings [MARM] relating to high-risk customers, multi-agency risk assessment conferences [MARAC] where domestic abuse is involved, and multi-agency public protection arrangement [MAPPA] meetings where violent or sexual offenders are housed in our homes.
- 2.30 We review lessons learned and actions from complaints and housing ombudsman cases.

Support Services

2.31 We provide a range of support services – details of all services are on Home and the website. Customers can be referred [or self-refer] to these services:

Carers Support Service	Springboard and Hardship fund
Housing Related Support Service	Home from Hospital Service
Homes Energy Advice Service	Social Prescribing Service
Tenant Wellbeing Service	Alliance Crisis fund

2.32 Where internal services can't meet customer need, we refer customers to other services which may be able to help.

Representation

2.33 Customers can nominate a representative to talk to us on their behalf. This can be a family member, friend or advocate. Permission should be given by the customer in writing with the advocate's details, unless the requirement is a 'one-off' request

Training and Support

- 2.34 This policy is a mandatory read as we want all colleagues to understand how reasonable adjustments impact their role. Service managers support their teams and explain how adjustments apply to their service area.
- 2.35 E-learning includes Safeguarding Adults and Children, Domestic Abuse Awareness and Equality, Diversity and Inclusion.
- 2.36 Discussing customers additional needs and reasonable adjustments are encouraged during Real Conversations, Ask reviews and team meetings.

3. Monitoring, consultation, and review

- 3.1 We will monitor performance delivering the objectives of this policy by reporting data on equalities and additional needs to our leadership team.
- 3.2 The Service Director – Customer Operations is responsible for the implementation and review of this policy.
- 3.3 Customers and colleagues will be involved in giving feedback on this policy, leading to amendments where appropriate.
- 3.4 This policy will be reviewed within 2 years of its approval date.
- 3.5 This policy will be signed off by the Strategic Leadership Team and the Board.
- 3.6 This policy will be published on the Alliance Homes website alongside a customer friendly version.

4. Equality and diversity

- 4.1 This policy is subject to a periodic Equality Impact Assessment (EIA).
- 4.2 The purpose of this is to consider the effect of the policy on 'protected characteristics' to ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Single Equality Scheme. Where we identify significant disadvantage, we will aim to reduce it.
- 4.3 The EIA requires the policy author to consider how it impacts on a person's Human Rights.
- 4.4 This policy and other Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

5. Complaints

- 5.1 If you would like to raise a complaint in relation to this policy, you can do this by calling us on **03000 120 120** or emailing us at **act@alliancehomes.org.uk**.
- 5.2 All complaints will be handled in line with the latest Alliance Homes Complaint Handling Policy.

6. Associated policy and procedure

- Safeguarding Adults and Children policy and procedure
- Equality, Diversity & Inclusion policy
- Customer Engagement Equality Impact Assessment
 - [Accessibility Support for customer engagement framework.docx](#)
- Communications Guidance
- Language Line identification card
- Anti-social behaviour policy and procedure
- Person Alerts procedure
- Customer complaints policy and complaints handling procedure
- Domestic Abuse policy and procedure
- Lettings policy
- Repairs, maintenance & improvements policy
- Decant procedure and Adaptations policy
- Debt Management Policy and Rent Arrears procedure
- Data protection policy
- Human Rights policy

7. Version control and approval dates

Approval stage	Date completed
Equality Impact Assessment completed	24 June 2024
EIA reviewed by Equality & Diversity Manager	24 June 2024

SLT review / approval	11 July 2024
People and Culture Committee review	17 July 2024
Board approval	21 August 2024
Next review date	August 2026
Minor Amendment Approved	Dec 2024
Minor Amendment [addition of Section 2.32]	March 2025
Minor amend made to insert standard complaints section and format for external publication	June 2025
Policy and EIA Review	August 2026

8. Appendices

Appendix A:

Appendix A Further reading - Links to regulatory / legal considerations

[Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Transparency, Influence and Accountability Standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[The Complaint Handling Code | Housing Ombudsman Service \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)

[Pre-Action Protocol for Possession Claims by Social Landlords – Justice UK](https://www.justice.gov.uk)

[Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Legislation relating to safeguarding adults - SCIE](https://www.scie.nhs.uk)

[Mental Capacity Act 2005 at a glance - SCIE](https://www.scie.nhs.uk)

[The Human Rights Act | EHRC \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

Appendix B: Equality Impact Assessment

Full Equality Impact Assessment

1. Name the Strategy, Policy, or Change (SPC) being assessed and name of author.

Reasonable Adjustments Policy Review 2026 – Alex Armstrong Service Delivery Manager,
Community Services & Engagement

2. EIA format?

Policy review ☒ Consultation ☐ Meeting ☐ Other _____

3. Aims of the SPC being assessed?

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

The policy aims to ensure that services meet the needs of all customers who need extra support or adjustments due to additional needs or a protected characteristic. Its purpose is to support colleagues and contractors to understand and implement adjustments when they identify needs. There is no age limitation to this policy.

In 2024 customers asked for an easy read policy summary that explains what this policy means to them in practice. This is located on our website, and it has been reviewed alongside the policy.

4. Who has been consulted in developing the SPC?

- *Make reference or links to consultation/evidence documents*

This policy has been reviewed by Alex Armstrong Service Delivery Manager - Community Services & Engagement. Consultation took place with all managers in Customer Operations and Service Delivery Managers in Repairs and Community Support.

The Customer Insights Manager advised on the content in line with the 'Writing Policies in Plain English' Guidance.

The Customer Scrutiny Panel and our EDI Champions provided feedback on this policy review.

5. Does the SPC promote equality of opportunity?

The policy promotes equality of opportunity across all the protected characteristics and applies equally to customers without protected characteristics – the whole premise of this policy is to provide services fairly in consideration of individual need.

Without this policy, which explains the types of adjustments we can make where it is reasonable, there would be a negative impact for most customers particularly groups in section 6

6. Identify any potential impact on each of the diversity "groups" by considering the following questions for example:

- **Might some groups find it harder to access the service?**
Many groups might find it hard / impossible to access our services without a reasonable adjustment – the policy provide examples of these.
- **Do some groups have particular needs that are not well met by the current SPPP?**
The policy is broader than just protected groups and aims to meet all needs for those customers who choose to provide their data [where it is reasonable to do so]. The momentum in our collection of and updating customer requirements needs to be maintained
- **What evidence do you have for your judgement** (e.g. monitoring data, information from consultation/research/feedback)?
The nature of this policy is all about having a positive impact on any customer with additional needs if we are aware of them. Life through your Lens data is growing and will continue to grow. Colleagues have shared examples of Reasonable Adjustments made [Appendix C], and the terminology is becoming embedded in organisation culture.
- **Have staff/residents raised concerns/complaints?**
The complaints team manager has no data on complaints related to not making Reasonable Adjustments as current reporting isn't refined to this level of detail. The action plan below sets out our intention to explore amending the complaints workflow.
- **Is there local or national research to suggest there could be a problem?**
Census data 2021 is provided below as a comparison, however our application of the policy is limited to customer willingness to provide their data. Not considering Reasonable Adjustments would be detrimental to any customer in need, however this policy seeks to address this.

List any existing information/data you have about different diverse groups ability to access this.

Protected Characteristic	No impact	Negative impact	Positive impact	Information source/s * 2021 Census data North Somerset	Comments/evidence																
					<u>CX – Q1 2026-27 Data [taken from the SLT report:</u>																
Race			x	95.7% white/british 4.3% other minority groups	Ethnicity: 88.14% White/British 11.86% other ethnic groups see Appendix C for breakdown] <u>Customers identified as having a vulnerability:</u> 2,835 [includes disabilities – see appendix C] <u>Gender:</u> 8741 gender indicated 35 gender non-binary <u>Age Range:</u> <table><tr><th><u>20-30yrs</u></th><th><u>31-40yrs</u></th><th><u>41-50yrs</u></th><th><u>51-60ys</u></th></tr><tr><td>666</td><td>1502</td><td>1482</td><td>1536</td></tr><tr><th><u>61-70yrs</u></th><th><u>71-80yrs</u></th><th><u>81-90yrs</u></th><th><u>91+yrs</u></th></tr><tr><td>1770</td><td>1363</td><td>713</td><td>159</td></tr></table>	<u>20-30yrs</u>	<u>31-40yrs</u>	<u>41-50yrs</u>	<u>51-60ys</u>	666	1502	1482	1536	<u>61-70yrs</u>	<u>71-80yrs</u>	<u>81-90yrs</u>	<u>91+yrs</u>	1770	1363	713	159
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1770	1363	713	159																		
Disability			x	18.6% have a disability																	
Gender			x	51.4% female 48.6 Male																	
Transgender			x	0.2% trans woman or trans man																	
Sexual orientation			x	90.6 straight / heterosexual 2.4% gay, lesbian, bi-sexual 0.3% queer, asexual. pansexual																	
Religion or belief			x	45.3% no religion. 46.6% Christian																	
Age			x	54% under 25 30.4% - 25 - 49 32.9% - 50-74 11.3% - over 75																	

Reasonable Adjustments Policy

Marriage & Civil Partnership	x			Census 2021 – 49.4% married or civil partnership	Contact preferences: 9298 mobile / 4064 landline / 2 braille / 4024 call before visit / 365 large font / 52 verbal communication / 20 written communication / password set 651 Caring Responsibility – 2025-26 estimates approximately 15% of the 2421 carers supported are Alliance Homes customers [source Charity Log]
Pregnancy and Maternity			x	Cx notes	
Caring Responsibility			x	Census 2021 – 8.8% are carers	
Socio and economic status			x	Census 2021 – 56.1% economically active. 40.3% economically inactive	

7. Mitigation Action Planning

What will be done to reduce any negative impacts or strengthen positive ones?

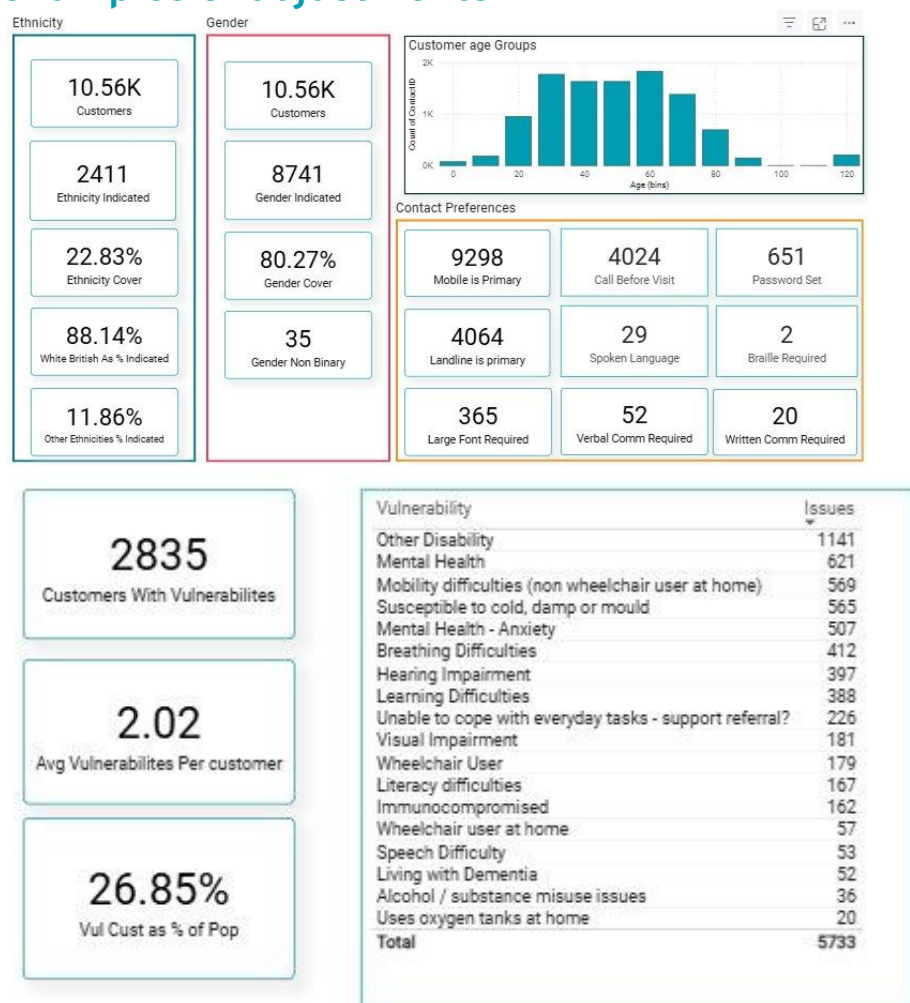
- *Is further research or consultation required to evidence the impact of the SPPP?*

Identified Action:	Owner:	Completion Date:
Continue to train new starters and raise awareness of RA's in Induction	L&OD	Continuous action
Promote refreshed policy and the summary in All the News. cas Regular internal campaigns to ensure collection / updating of data continues [we only know what we know!]	Daniel Faulkner - Comms	After SLT approve policy
Provide an update on the refreshed policy and summary to Hive homes alongside changes made	Sara Law – Business Insight	After SLT approve policy
All colleagues to read the refreshed policy as part of the Mandatory Read expectation on Learn 365	Managers to monitor	Before end October 2026
Explore adding RA's to the complaints workflow, as a case type to enable future monitoring of complaints.	Kerren Ashmore	December 2026
Provide an annual equalities data set [to be located on Home] to provide managers with data to support completing EIA's.	Alastair Sneddon	April 2027

Sign-off (EDI Champions Group / HR EDI Specialist):

Name: _____ Date: _____

Appendix C: Ethnicity Breakdown, Data set Quarter 2 – 2026 and examples of adjustments



Examples of Reasonable Adjustments

[Reasonable Adjustment Examples.docx](#)

Breakdown of Ethnicity

Asian/Asian British: Bangladeshi	9
Asian/Asian British: Indian	3
Asian/Asian British: Other	8
Asian/Asian British: Other / White: British	1
Asian/Asian British: Pakistani	1
Black/African or Caribbean or Black British: African	12
Black/African or Caribbean or Black British: African / Prefer not to say	1
Black/African or Caribbean or Black British: Caribbean	6
Black/African or Caribbean or Black British: Other	2
Chinese or Other Ethnic Group: Arab	7

Reasonable Adjustments Policy

Chinese or Other Ethnic Group: Chinese	4
Mixed: Other	5
Mixed: White & Asian	4
Mixed: White & Black African	3
Mixed: White & Black Caribbean	9
Other Ethnicities: Not listed	15
Prefer not to say	100
Prefer not to say / White: British	2
Refused	13
Refused / White: British	1
White: British	2075
White: British / White: Irish	1
White: British / White: Other	3
White: Gypsy/Irish Traveller	3
White: Irish	9
White: Other	56