

Reasonable Adjustments Policy – For our customers (NOT FOR STAFF – HR SHOULD CREATE SEP POLICY)

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1: Introduction

The London Borough of Tower Hamlets (LBTH) is committed to providing services to our customers that provide equitable access to all. This includes enabling and empowering those with disabilities to use our services. Under the Equality Act 2010, the local authority has a legal duty to ensure **reasonable adjustments** can be made for those with disabilities to access council services in the same way (as far as reasonably possible) as those without disabilities.

2: What are reasonable adjustments?

As a public authority, LBTH has a duty to make reasonable adjustments to the way we provide our services to our disabled customers (those who would meet the Equality Act 2010 definition of eligible disability) to ensure they are not placed at a disadvantage in comparison to those without disabilities.

Some examples of a reasonable adjustment can be:

- Allowing communications such as a complaint to be given orally rather than in writing
- Providing additional time or extending a time limit (if it does not breach a statutory or legal limit)
- Providing documents in an alternative format
- Allowing an individual to be suitably supported by a representative or advocate
- Providing additional auxiliary aids and services such as a British Sign Language (BSL) interpreter where one is required for someone with a hearing impairment
- Providing an ergonomic chair for someone who requires it due to an impairment for a meeting at a council property

There is also an *anticipatory* reasonable adjustment duty in the Equality Act 2010 that requires providers of services and public functions

continually to identify any possible disability-related disadvantage, and to take reasonable steps to avoid or remove it. These can include ensuring council information such as on our website is available in accessible formats and that our public facing areas are reasonably wheelchair accessible.

3: Who can request reasonable adjustments?

While the legal duty imposed on LBTH is to provide reasonable adjustments to disabled persons who meet the eligible definition, *anyone* can request reasonable adjustments from the council.

4: What is considered reasonable?

LBTH will consider reasonable adjustment requests from our customers on a case-by-case basis where it concerns an adjustment that is not currently in place. It should be kept in mind that the intent of a reasonable adjustment would be to place an individual with a disability to the same level of opportunity and access as possible as others.

The Equality Act's Code of Practice provides the following considerations that can be made to decide whether an adjustment is reasonable:

- EFFECTIVENESS – The requested adjustment should be able to effectively deliver the above discussed intent of providing equal accessibility
- PRACTICABILITY – The requested adjustment should be reasonably practicable in its implementation and delivery
- COSTS, ASSISTANCE & RESOURCES – The requested adjustment should be reasonably weighed against any adjustments already in place that may be suitable, and any new adjustment would need to be proportionate considering LBTH's size, function and ability to deliver services to all
- DISRUPTION – The requested adjustment should not cause an unreasonable demand or disruption on the ability of staff or services to deliver their roles and services

It is not possible to provide an exhaustive list of what would be considered reasonable as the reasonableness of a request will depend on its specific

circumstances. However, LBTH will ensure any reasonable adjustments made would be compliant with the Equality Act 2010 and in line with our Equality Policy (2023-2027).

5: How can a reasonable adjustment be requested?

An individual can raise a request with any customer facing council staff or services. If an individual has an allocated named worker such as a social worker, they can raise the request via their known worker or through that service. They can also contact our contact centre to request a reasonable adjustment for a service they are currently receiving or intend to receive.

The contact details for the council are below:

[Contact us \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

6: If someone is unhappy with how their reasonable adjustment request has been handled

LBTH will work to ensure any reasonable adjustment request are appropriately considered in promoting our aim in ensuring our services are accessible for all our customers.

However, where someone may feel their request has not been correctly handled or implemented by a council service or employee, they can provide feedback and also have the right to complain.

[Comments, compliments and complaints \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

7: Further reasonable adjustments information and resources

The below resources can provide helpful information and guidance around reasonable adjustments:

- [Equality Act 2010: Duty to Make Adjustments](#)
- [Equality Act 2010: Guidance](#)
- [The Equality and Human Rights Commission – Reasonable Adjustments for Disabled People](#)
- [The Citizens Advice Bureau – Duty to Make Reasonable Adjustments](#)

- Scope – Reasonable Adjustments
- Mind – Reasonable Adjustments

REASONABLE ADJUSTMENTS SERVICE SURVEY

(1) Recording reasonable adjustment requests: Services should use their primary casework systems to leave a headline note/notification of any agreed reasonable adjustment. For example, any services using icasework can go to Edit Contact and then under “Phone” can detail any phone related adjustment that would be displayed on the main contact screen. Similarly, any social care services staff on Mosaic can use the case warning system to display an agreed adjustment on the front screen of a contact.

Q1: Does your service use a CRM/system that allows the recording of an agreement adjustment in a visible way?

Q2: If YES to the Q1, is your service currently using this to record adjustments - if not, why not?

Q3: If NO to Q1, is your service customer facing in a manner where reasonable adjustments could feasibly be requested or have been requested in the past? If so, how would these be recorded?

(2) Assessing reasonable adjustments – Services should be able to provide a range of reasonable adjustments that are already in place or implemented within the council that are available to them. For example, all services that produce and send letters to residents can provide adjustments such as different formats available on the system. Similarly services that are customer facing and use MS Teams should be able to meet with residents on teams if requested.

Q4: Where a customer requests a reasonable adjustment outside of an already implemented or available adjustment in your service, is your staff confident in assessing the requested adjustment in line with Part 4 of the reasonable adjustment policy?

Q5: If NO to the above, what gaps in knowledge or training around reasonable adjustments do you feel are needed to be addressed in your service?

(3) Making reasonable adjustment decisions and delivering them– Services should feel confident and empowered to be able to support disabled customers in deciding and delivering reasonable adjustments. This means implementing them in a reasonable timeframe as to not disadvantage the individual requesting them.

Q6: Does your service feel confident in making decisions with reference to requested reasonable adjustments?

Q7: If NO to the above, what gaps in knowledge or training around reasonable adjustments do you feel are needed to be addressed in your service?

Q8: Does your service feel confident in being able to deliver reasonable adjustments effectively?

Q9: If NO to the above, what gaps in knowledge or training around reasonable adjustments do you feel are needed to be addressed in your service?