



HOUSING POLICY

Reasonable Adjustments Policy 2024



LONDON BOROUGH OF
HARROW

Reasonable Adjustments Policy

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<i>Details of any changes or reviews should be added.</i>	

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1. Purpose

At the London Borough of Harrow we are committed to removing barriers for residents who have vulnerability needs. We will make reasonable adjustments to limit communication barriers when accessing our services. We also want to remove barriers that make it difficult for residents to live independently within their homes. We understand that residents who have vulnerability needs may require us to make some reasonable adjustments to the way that we provide services or to make alterations within their home. We have considered relevant government legislation in the creation of this policy.

2. Objective

Reasonable adjustments are used to help remove barriers and to promote equality for Harrow residents who have vulnerability needs. We want to ensure that we do not place a person with vulnerability needs at a substantial disadvantage compared to a person without a vulnerability need. For example, we may have to offer afternoon appointments only, to a resident who has an impairment which prevents them from being available during the morning. The same may not be offered to a resident without vulnerability needs as they can access services during the morning and afternoon. By doing this, both residents have access to an appointment regardless of their needs.

3. Definitions

The Government explains reasonable adjustments as:

“Under the [Equality Act 2010](#) public sector organisations have to make changes in their approach or provision to ensure that services are accessible to disabled people as well as everybody else. Reasonable adjustments can mean alterations to residential buildings by providing lifts, wide doors, ramps and tactile signage, but may also mean changes to policies, procedures and staff training to ensure that services work equally well for people with vulnerabilities.

For example, people with learning disabilities may require:

- ☐ *Clear, simple repeated explanations.*
- ☐ *Assistance to organise and keep appointments.*
- ☐ *Help with managing issues of consent in line with the [Mental Capacity Act](#).*

Public sector organisations should not simply wait and respond to difficulties as they emerge: the duty on them is ‘anticipatory’, meaning they have to think about what’s likely to be needed in advance.

All organisations that provide NHS or adult social care must follow the [accessible information standard](#) by law. The standard aims to make sure that people who have a disability, impairment or sensory loss are provided with information that they can easily read or understand with support so they can communicate effectively with health and social care services”.

A reasonable adjustment could be something as simple as providing a sensory doorbell with a flashing light to let someone with a hearing impairment know that someone’s at the door. A more complex adjustment could be providing a lift inside a home because the resident can no longer physically climb the stairs.

4. Statement

The London Borough of Harrow will provide 2 types of adjustments:

- a. A provision, criterion or practice adjustment means that you require us to change the way we do things. For example: Someone who experiences mental distress might request that their landlord gives them extra notice if they need to visit the home.
- b. An auxiliary aid adjustment means that you require us to add a feature to your home. For example: Someone with an impairment that impacts their ability to turn a tap might request a lever tap.

What do we consider to be reasonable?

What is considered reasonable is not defined. The Council will look at each case and take the following into consideration before making a decision.

- How long the resident is likely to be in the home? It may not be possible to make an adjustment if the resident will be moving out soon
- If the condition or disability temporary
- The cost and scale of the adaptation
- If the adjustment will completely resolve the issue.

Below are some examples (not an exhaustive list) of physical adaptations (auxiliary aids) the Council can make to your home.

- Ensuring the building or dwelling is safe
- Facilitating access to and from the building
- Facilitating access to or providing a bedroom
- Facilitating access to the principal family room
- Provision of a room containing a bath or shower or facilitating the use of such a facility
- Provision of a room containing a WC or facilitating the use of such a facility
- Provision of a room containing a wash hand basin or facilitating the use of such a facility
- Facilitating the preparation and cooking of food (only if used by the disabled person)
- Providing or improving a heating system
- Facilitating the use of power, light or heat by altering the same or by providing additional means of control
- Facilitating access and movement around the dwelling to enable the disabled person to provide care for another person.

Adjustments you can't you apply for

The Council is not required to remove or alter a physical feature of the home such as widening doorways, removing structural walls, etc.

Who can apply for reasonable adjustments

Any council tenant (including on behalf of their household members) who is considered disabled or is applying on behalf of someone who is disabled under the Equality Act 2010 can apply for a reasonable adjustment.

"You are disabled under the Equality Act 2010 if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities". For more detail around this please visit [Definition of disability under the Equality Act 2010 – GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/definitions/disability-under-the-equality-act-2010)

The Citizens Advice service may be able to support you with making a reasonable adjustment application <https://www.citizensadvice.org.uk/housing/discrimination-in-housing/taking-action/asking-for-adjustments-to-help-with-your-disability/>

Requesting a provision, criterion, or practice adjustment

If you require the London Borough of Harrow to make a reasonable adjustment that involves adaptations to your home, you will need to email: hart.hart@harrow.gov.uk for a needs assessment. If you need any other reasonable adjustments please contact your housing officer www.harrow.gov.uk/housing. We recommend that you include as much detail as possible or ask someone to support you with writing to us on your behalf if you are unable to. Your request should include the following:

- The details of the disability
- How it affects you
- Why you need the reasonable adjustment
- What type of adjustment is needed.

Requesting an auxiliary aid

If you are a homeowner, sub tenant (privately renting) or a leaseholder, you can apply to the Council for a Disabled Facilities Grant which will be determined following your occupational therapy assessment. If you are a sub tenant or privately renting you will need to get permission from your landlord before any adaptations can be completed. Council tenants don't need to apply for a Disabled Facilities Grant as this will be funded from Housing Revenue account, following your assessment.

Once your application is received and an occupational therapy assessment has been carried out, the Occupational Therapist can help to identify appropriate alterations needed to the home which cater to the resident's long-term needs. This will enable residents to live independently within their home.

If the Occupational Therapist's assessment shows that reasonable adjustments or adaptations are needed, they will provide a report and any supporting evidence to Harrow's Adaptation Team detailing their recommendations. If the recommendations are necessary and reasonable for the property, the Disability Fund Grant becomes mandatory for homeowners and leaseholders only.

The Council will carry out a means test for more complex adaptations to decide how much grant will be applied. If a means test is required, please contact the Adaptations Team by emailing hart.hart@harrow.gov.uk.

Note: If the applicant is under the age of 18 no means test is required.

Decision

Following receipt of your completed application and all the required documentation, your case will be allocated to a surveyor who will determine what adaptations are necessary. Written confirmation will be sent to you specifying what works have been approved.

What will happen if the application is refused?

We will write to you explaining the reasons for the refusal.

Homeowners

If you are a homeowner or owner-occupier and you receive a Disability Funds Grant, you are expected to remain in the property for at least 5 years from the certified date of completion. If the property changes ownership within 5 years of the adaptation's completion date, then the Council will use its discretion, but may reclaim all or part of the grant. Disability Funds Grant can be subject to a 10-year legal charge on the property if the adaptation increases the value of the overall property.

If you are not satisfied

If you have a complaint about our handling of your reasonable adjustment request, or the response you have received, you should follow the complaints procedure.

www.harrow.gov.uk/complaints

If you are unhappy with the way we dealt with your complaint, you can refer your complaint to the Housing Ombudsman Service – <https://www.housing-ombudsman.org.uk/>

5. Compliance

Managers are responsible for ensuring that all relevant staff members are trained on Reasonable Adjustments. Refresher training should be carried out each year and managers should record any areas of noncompliance and take appropriate corrective actions.

6. Review

This policy shall be reviewed and updated after any relevant legislative or regulatory changes, new case law, guidance and best practice or operational issues.

7. Other Related Strategies and Policies

This policy should be read in conjunction with:

[Equality and Diversity Policy](#)

[Access strategy](#)

[People with needs policy](#)

The Reasonable Adjustment Policy is in line with government legislation.

[Equality Act 2010 \(legislation.gov.uk\)](#)

[Mental Capacity Act 2005 \(legislation.gov.uk\)](#)

[NHS England » Accessible Information Standard](#)

[Housing Grants, Construction and Regeneration Act 1996 \(legislation.gov.uk\)](#)

8. Equality Impact assessment

Equality Impact Assessment is currently in hand.