Blackpool Coastal Housing

Customer Reasonable Adjustments Policy

October 2026

INSPIRING PEOPLE TO BUILD SUSTAINABLE COMMUNITIES

Document Information

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Scope of Document		
Objective	To provide an overview of how BCH will provide reasonable adjustments to support customers with access to services.	
Who needs to know?	All BCH staff	
Documentation	Customer Advocacy and Authority to Act Policy	
Where Ratified	Senior Management Team	
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Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By
07/06/2024	2.0	All	Full review and amendment to policy, to include advocacy and re-naming of policy to distinguish between HR Reasonable Adjustment Policy for staff.	Suzanne Tomlinson
14/10/2026	2.1	All	Full review of policy following consultation with customers. Changes made to provide further definition and additional examples provided. Ways we will publicise the policy also amended to include additional methods. Ratified by SMT at 14/10/2026	Suzanne Tomlinson

Amendment Notes

- Documents at draft status are to use letter designations to denote issue status: a, b, c etc.
- Documents at full issue status are to use number designations to denote issue status after full revision: 1.0, 2.0, 3.0, etc.
- For an amendment to a full issue document you are to use number designation to denote issue status: 1.1, 1.2, 2.1, etc.
- On full issue the draft amendment record should be deleted from the above table.
- Notification of the amendment must be sent to the person maintaining the Central Register.

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1. Introduction

1.1
Blackpool Coastal Housing is committed to ensuring that people who have a disability are not in any way disadvantaged in accessing our services and we will therefore make reasonable adjustments to ensure our services are accessible for all.

1.2
This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy and:

- Confirms our commitment to improving accessibility for everybody that we deal with
- Sets out some of the basic principles of our commitment to provide reasonable adjustments for disabled people
- Sets out the factors that we will take into account in dealing with requests for reasonable adjustments

1.3
This policy provides a general overview of our approach and outlines how we will respond to requests for reasonable adjustments from all our customers, as many of the arrangements we offer for people with a disability, can also be of benefit to all our residents. For example, provision of documents in larger font, convening a meeting at a venue suited to an individual's needs or providing information in an alternative language.

1.4
This policy applies to all Blackpool Coastal Housing customers. The term customer refers to tenants, leaseholders, licensees, looked after children and private customers or homeowners, for which Blackpool Coastal Housing provides a service. A separate policy applies to BCH staff members and applicants. Please also refer to the BCH Customer Advocacy Policy.

2. The Equality Act 2010

The Equality Act 2010 (the Act) is a legislative framework protecting the rights of individuals and ensuring the advancement of equality of opportunity for all. As a provider of services to the public and other public bodies Blackpool Coastal Housing commits to comply with the provisions for public bodies under the Act.

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

- 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
- Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled
- Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled

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

3. What is Reasonable Adjustment?

To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct the disadvantage to a person with a disability.

A reasonable adjustment when communicating or engaging with a customer is a change to the way information or services are provided so that a person with a disability, health condition, communication difficulty, or other specific need can access the service fairly and effectively.

4. Requesting a Reasonable Adjustment

We will publicise how our customers can request a reasonable adjustment in the following ways:

- On our website
- In newsletters, mail shots or text messages
- In our new tenant information
- In our correspondence with our customers i.e. complaint form
- By informing customers of available reasonable adjustments as part of everyday customer interactions and checking if a reasonable adjustment might be required
- By including a note on our published documents indicating that we can provide the document in an alternative format on request
- By recording any required reasonable adjustments as part of a resident profiling exercise

5. Types of Reasonable Adjustments We Can Offer

There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

Some examples of the adjustments that staff can make include:

- Providing specialist equipment or additional support such as a sign language interpreter or hearing loop for a meeting or event
- Providing information in another format, such as large print or on coloured paper
- Using plain language and avoiding jargon
- Not contacting or visiting at certain times of the day
- Allowing extra time for conversations or decision-making
- Communicating through a customer's preferred method, such as email, text message, letter, or telephone
- Offering a quiet meeting space for someone with anxiety or sensory sensitivities
- Permitting a family member, advocate, or support worker to assist with communication (with the customer's consent
- Arranging a meeting in a suitable venue
- Rest or comfort breaks in meetings

6. Our Response to Requests for Reasonable Adjustments

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

7. How Do We Decide What is Reasonable?

The Equality Act does not define what is 'reasonable' but guidance from the Equality and Human Rights Commission Suggest that the most relevant factors are:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person
- The practicality of us making the adjustments
- The availability of our resources including external assistance and finance
- Any disruption to the Service that making the adjustment may cause

7.1 – Effectiveness
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 the disabled person if there are other requirements that need to be overcome, for example the customer also has a hearing impairment.

7.2 – Practicality
For example, it may not be possible for us to provide additional time to customers if there are legislative deadlines to meet.

7.3 – Resources
For an adjustment to be reasonable, it should be effective. However, it is important to remember that is 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 staff 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.

The reasonableness of an adjustment will be evaluated against the resource available to our Service. In practice many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

In changing policies, criteria or practices we are not required to change the basic nature of the service we offer.

7.4 - Potential Disruption to Blackpool Coastal Housing Service activities
For example, it would not usually be reasonable for a staff member to cease on all other work functions and devote all of their time to one person as others will inevitably suffer. The amount of extra time provided must therefore be 'reasonable' in all the circumstances.

8. Monitoring

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.

Recorded reasonable adjustments will be reviewed every 2 years, or sooner if we are advised of a change of circumstances or new information is received.

9. Dealing with Complaints

We are committed to provide accessible services for all that are fair and free from discrimination. If someone is dissatisfied with the arrangements we have made for providing reasonable adjustments, we will respond in accordance with our complaints policy.