Equity, Accessibility and Reasonable Adjustments Policy

(Brighter Places Customers)

Date of Approval:	May 2026
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Date of next review:	May 2029

You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements

Should colleagues require any reasonable adjustments to allow for engagement with this document please contact the policy lead.

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1. Policy Statement

This policy sets out Brighter Places approach to ensuring we provide reasonable adjustments for our customers in regard to how they access and use our services across the business.

We are committed to providing fair, accessible and inclusive services. We recognise our legal and moral responsibility to ensure that tenants, leaseholders and other customers can access our services without disadvantage due to disability, protected characteristics, or vulnerability.

This policy sets out how we meet our duties under the Equality Act 2010, including the duty to make reasonable adjustments, and how we ensure our services are accessible, responsive and inclusive for all customers.

This policy applies to customers only. For reasonable adjustments for colleagues please ref to HR.

2. Commitment

Brighter Places are committed to promoting equity, accessibility and inclusion in everything we do.

We recognise that our customers have diverse needs and circumstances, and that equality is not achieved by treating everyone the same, but by ensuring fair and proportionate access to our services.

Through the delivery of this Equity, Accessibility and Reasonable Adjustment Policy, we will take proactive steps to identify and remove barriers that may prevent customers from engaging with us or sustaining their tenancy.

We will make reasonable adjustments to our services, communication methods, policies and processes where required, in line with our legal duties under the Equality Act 2010.

In this policy the term reasonableness will consider cost, practicality and effectiveness.

Our approach is person-centred, respectful and evidence-based, ensuring that decisions are fair, consistent and sensitive to individual circumstances. We are committed to embedding equity as a golden thread across service design, delivery and decision-making, and to continually reviewing our practices to ensure they remain inclusive, accessible and responsive to the needs of our communities.

This policy applies to:

- All tenants, leaseholders, and household members
- Applicants for housing and prospective customers
- Customers accessing any of our services including housing management, repairs, complaints, neighbourhood, ASB, safeguarding and support services

3. Linked Documents

This policy is underpinned by the following legislation and regulatory expectations:

- Equality Act 2010
- Public Sector Equality Duty (Section 149 Equality Act 2010)
- Human Rights Act 1998
- Housing and Regeneration Act 2008
- Social Housing (Regulation) Act 2023

Under the Equality Act 2010, we have a proactive duty to:

- Eliminate discrimination, harassment and victimisation.
- Advance equality of opportunity.
- Foster good relations between people with and without protected characteristics.

4. Legal and Regulatory Compliance

- Government Regulatory Consumer Standards
    - Safety and Quality Standard
    - Tenancy Standard
    - Neighbourhood and Community Standard
    - Transparency, Influence and Accountability Standard
- Tenant Satisfaction Measures
- Housing Ombudsman code Housing Ombudsman Complaint Handling Code – including the Ombudsman Spotlight reports on accessibility

5. Policy Detail

5.1 Introduction and scope

We recognise and protect the following characteristics under the Equality Act 2010:

- Age
- Disability
- Gender reassignment

- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

We are committed to ensuring that our services are delivered in a way that is fair, inclusive, and free from discrimination for all customers. In applying this policy, we will have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not.

Emphasis is placed on disability-related access needs, recognising that people with disabilities may face additional barriers in accessing housing services or engaging with us. We acknowledge that disability is diverse, may not always be visible, and can vary in its impact over time.

Disability may include, but is not limited to:

- **Physical disabilities**
  Including mobility impairments or health conditions that affect a person's ability to move around, access buildings, or carry out day-to-day activities.
- **Sensory disabilities**
  Including visual or hearing impairments, which may affect how individuals access information, communicate, or engage with services.
- **Cognitive or neurodiverse conditions**
  Including conditions such as autism, ADHD, dyslexia, or learning disabilities, which may impact processing of information, communication, memory, or organisation.
- **Mental health-related conditions**
  Including conditions such as anxiety, depression, or other mental health needs, which may affect a person's ability to engage, make decisions, or manage day-to-day activities, particularly during periods of distress.
- **Long-term illness or hidden disabilities**
  Including conditions that may not be immediately visible, such as chronic illness, fatigue-related conditions, or fluctuating health issues, which may have a significant impact on daily life and engagement with services.

We recognise that individuals may experience multiple or intersecting characteristics, and that the impact of disability can vary depending on personal, social, and environmental factors.

As such, we will avoid assumptions and take a personalised approach to understanding how protected characteristics, particularly disability, affect each customer's ability to access and use our services.

Our approach is to remove or reduce barriers wherever possible, ensuring that customers are not placed at a disadvantage and can engage with our services safely, effectively, and with dignity.

5.2. Reasonable Adjustments

Reasonable adjustments are changes we make to ensure that customers can access our services fairly and without disadvantage. These changes may be required on a temporary or ongoing basis and wherever possible are tailored to the individual's needs, preferences, and circumstances.

This may include adjustments to:

5.2.1 Policies and procedures

We may adapt how our policies are applied in practice to ensure they are fair and proportionate. This could include flexibility in timescales, alternative approaches to enforcement or compliance, or adjusting processes to enable customers to engage effectively. Decisions will always be evidence-based, lawful, and considerate of individual circumstances.

5.2.2 Physical environments

We may consider changes to the physical environment or how services are delivered in a place-based context. This can include arranging accessible meeting locations, adapting properties (where appropriate and subject to assessment), or making adjustments to how repairs, inspections, or visits are carried out to account for mobility or sensory needs.

5.2.3 Communication methods

We will adapt how we communicate to suit individual needs and preferences. This may include providing information in alternative formats (e.g. large print, easy read, or digital), offering written follow-up to verbal discussions, using different communication channels, or allowing additional time for customers to process and respond to information.

5.2.4 Service delivery approaches

We may adjust the way services are provided to ensure customers can access and benefit from them. This could include modifying appointment arrangements, involving advocates or support workers, adjusting how we manage cases (including ASB,

complaints or arrears), or taking a more flexible and supportive approach where accessibility needs impact engagement.

These adjustments are designed to remove or reduce disadvantage experienced by customers with disabilities or accessibility needs, enabling equitable access to our services.

We will work in partnership with customers to understand what works best for them, record agreed adjustments appropriately and review them at key points to ensure they remain effective and relevant. Adjustments also form an important part of our safeguarding approach, particularly where unmet needs may increase risk or vulnerability.

5.3 How we manage Reasonable Adjustments

We will:

- **Take a person-centred approach, recognising individual needs**

We will work with customers to understand their specific circumstances, preferences, and accessibility needs. We recognise that needs may not always be visible or static, and we will listen carefully to customers, their families, advocates or support networks where appropriate. Our approach is based on dignity, respect, and partnership, ensuring that customers feel heard and involved in decisions that affect them.

- **Act proactively, not waiting for formal requests where needs are apparent**

We will not rely solely on customers identifying or requesting adjustments themselves. Where colleagues become aware of potential accessibility needs—through communication, behaviour, or information already known—we will take reasonable steps to explore and offer appropriate support. This includes anticipating needs at key points such as new tenancies, changes in circumstances, safeguarding concerns, or during service interactions.

- **Apply professional judgement, balancing individual need with proportionality**

Colleagues will use informed and proportionate judgement when considering reasonable adjustments, considering the individual's needs, the effectiveness of the adjustment, and the resources required to deliver it. Decisions will be fair, lawful, and evidence-based, ensuring that adjustments are appropriate while maintaining consistency and accountability across the organisation.

- **Record and share adjustments appropriately**

Agreed adjustments will be recorded clearly and securely to ensure consistency of service and to avoid customers needing to repeat their needs. Information will be shared on a need-to-know basis, in line with data protection requirements, to support safe, coordinated and effective service delivery.

- **Review adjustments regularly to ensure they remain effective**

We recognise that needs and circumstances can change over time. Adjustments will be reviewed at appropriate intervals, including at key contact points, during case reviews, or when a customer's situation changes, to ensure they continue to meet the intended purpose and remain relevant.

- **Embed reasonable adjustments within safeguarding and risk management**

We recognise that unmet accessibility needs can increase vulnerability or risk. Colleagues will consider whether a lack of appropriate adjustments could impact a customer's safety, wellbeing, or ability to engage, and will take appropriate action, including working with partner agencies where required.

Reasonable adjustments may include, but are not limited to:

- Providing information in alternative formats (e.g. large print, easy read, translated or digital formats)
- Offering different communication methods (e.g. written, phone, face-to-face, or via a representative)
- Allowing additional time for customers to understand information or respond
- Arranging home visits or meetings in accessible locations
- Adapting appointment times or scheduling to meet individual needs
- Involve advocates, carers, or support workers in interactions
- Adjusting how policies or processes are applied, including flexibility in timescales or requirements
- Modifying how services are delivered, including repairs, inspections, or case management approaches
- Taking a more supportive or flexible approach where engagement is impacted by disability or accessibility needs
- Using plain English Plain English communication including the use of Reach Deck software
- Offering named officers for casework

5.3.1 Physical and Environmental Adjustments

Physical and environmental adjustments focus on removing or reducing barriers within the home and wider service environment, ensuring that customers can

access, use, and engage with services safely, independently, and with dignity. These adjustments recognise that the physical environment and how services are delivered can significantly impact a person's ability to live comfortably and participate fully.

- **Adapted properties (subject to assessment and funding routes)**

We will consider requests for adaptations to a customer's home where these are necessary to support independent living, safety, and accessibility. This may include minor adaptations (such as grab rails or lever taps) or more significant adaptations (such as level-access showers, ramped access, or layout changes), subject to assessment, eligibility criteria, and available funding routes. We will work with relevant partners, including Occupational Therapists and local authorities, to ensure that adaptations are appropriate, proportionate, and delivered in a timely way wherever possible.

- **Mobility-related access considerations during visits**

When carrying out home visits or arranging interactions with customers, we will take account of mobility, sensory, or health-related needs to ensure visits are safe and accessible. This may include allowing additional time for visits, adjusting how access is gained to properties, ensuring safe entry arrangements, or adapting how colleagues engage with customers within the home environment. Where appropriate, alternative arrangements such as meeting in an accessible location may also be considered.

- **Adjusted arrangements for repairs or inspections**

We will adapt how repairs, servicing, and inspections are delivered to ensure customers can engage safely and effectively. This may include flexible appointment times, clear and advance communication, allowing additional time for access, or making reasonable adjustments to how work is carried out on site. We will also consider the impact of works on customers with accessibility needs (for example, minimising disruption for those with sensory sensitivities or health conditions) and ensure that contractors are aware of and sensitive to any agreed adjustments.

5.3.2 Recording and Managing Accessibility Needs

Accessibility and adjustment needs will be recorded clearly and securely on customer IT records

All identified accessibility needs and agrees reasonable adjustments will be accurately recorded within customer records to ensure a consistent and informed approach across all services. Records will be clear, up to date, and sufficiently detailed to enable colleagues and contractors to understand what adjustments are required and how they should be applied in practice. This helps to avoid customers

having to repeatedly explain their needs and ensures continuity of service across different teams and interactions.

- **Information will only be shared on a need-to-know basis and in line with Data Protection legislation.**

We will handle personal information about accessibility needs sensitively and in line with data protection law. We will share it only with colleagues or partners who need it to provide services, manage risk or support effective engagement. In doing so, we will balance safe, inclusive service delivery with the need to protect customers' privacy and confidentiality.

- **Customers will be involved in confirming what works best for them**

We will work in partnership with customers to identify, agree, and refine reasonable adjustments. Customers are best placed to explain what supports their access and engagement, and their views will be actively sought and respected. Where appropriate, we will also involve advocates, carers, or support networks to ensure adjustments are practical, effective, and tailored to the individual. This collaborative approach helps to build trust and ensures adjustments are meaningful rather than assumed.

Adjustments will be reviewed to ensure they remain appropriate and effective
We recognise that accessibility needs may change over time, and that adjustments must be kept under review to remain relevant. Reviews will be proportionate and responsive to the customer's circumstances, and will take place:

We will use key points of contact with customers, for example, during tenancy changes, case reviews, routine contacts, or when services are initiated to update our knowledge and understanding of customer needs. These contact points provide an opportunity to check that existing adjustments are still effective and to identify any new or emerging needs.

Where there are changes in a customer's health, household composition, support arrangements, or wider circumstances, we will reassess whether adjustments remain suitable and make updates as required.

As part of complaints, ASB or safeguarding cases accessibility needs will be actively considered within case management processes, recognising that unmet needs can impact a customer's ability to engage or may increase risk. Adjustments will be reviewed to ensure that customers are able to participate fully and safely in these processes and that service delivery is fair and inclusive.

This approach ensures that reasonable adjustments are not static, but are actively managed, reviewed, and adapted to support equitable access, effective engagement, and safe service delivery.

5.3.3 Decision-Making and Refusals

Where a requested adjustment cannot reasonably be made, we will provide a clear and accessible explanation to our customer.

We will explain the reasons for our decision in plain language, ensuring the customer understands why the request cannot be fulfilled. This will include outlining any practical, legal, financial, or operational considerations that have been taken into account, and how the decision has been reached. We will ensure explanations are delivered in a way that is accessible to the customer.

- **Explore alternative options**

Where a requested adjustment cannot be met, we will work with the customer to identify reasonable and proportionate alternatives that may achieve a similar outcome. This may include offering different types of support, adjusting the approach in another way, or signposting to partner agencies where appropriate. Our aim will always be to minimise disadvantage and enable continued access to services.

- **Document the decision and rationale**

All decisions will be clearly recorded, including what was requested, what has been considered, and the reasons for the outcome. This ensures transparency, consistency, and accountability, and supports effective oversight and learning across the organisation.

- **Ensure decisions are proportionate, lawful and evidence-based**

Decisions will be made in line with the Equality Act 2010 and relevant guidance, taking into account the nature of the customer's needs, the effectiveness of the proposed adjustment, and the resources required to deliver it. We will ensure that decisions are fair, balanced, and do not result in unlawful discrimination, whether direct or indirect.

- **Offer the opportunity for review or challenge**

Customers will be informed of their right to ask for a decision to be reviewed if they feel it does not appropriately reflect their needs. Where appropriate, we will consider new information or changed circumstances and reassess the decision.

- **Refusals will be rare and subject to appropriate management oversight.**

Any decision to refuse a requested adjustment will be escalated or reviewed in line with internal governance arrangements to ensure consistency, fairness, and

compliance with legal duties. This provides assurance that refusals are justified, proportionate, and applied consistently across the organisation.

5.3.4 Safeguarding and Vulnerability

Accessibility needs and reasonable adjustments form a core part of our safeguarding approach. We recognise that unmet accessibility needs may increase vulnerability, reduce a customer's ability to engage with services, and in some cases contribute to or exacerbate safeguarding risks. Ensuring appropriate adjustments are in place is therefore essential to promoting safety, wellbeing, and equitable access to support.

Officers will:

- **Consider whether accessibility issues create or increase risk**

Officers will actively consider whether a customer's accessibility needs may impact their ability to understand information, communicate effectively, comply with tenancy requirements, or seek help. Where needs are not met, this may increase isolation, distress, or exposure to harm. Accessibility will therefore be treated as a key factor when assessing vulnerability and risk.

- **Liaise with partner agencies where needs overlap with safeguarding concerns**

Where accessibility needs intersect with safeguarding issues, officers will work collaboratively with relevant partner agencies (such as adult or children's services, health providers, or support organisations). Information will be shared appropriately to ensure a coordinated, multi-agency response that supports the customer's safety and wellbeing.

- **Ensure adjustments support safe and effective engagement with services**

Colleagues will ensure that reasonable adjustments are put in place to enable customers to engage safely with our services. This may include adapting how we communicate, how we deliver services, or how we manage risk. Adjustments will be designed not only to improve access, but also to reduce risk, support informed decision-making, and enable customers to participate fully in resolving issues affecting them.

- **Recognise when adjustments alone are not sufficient**

Where accessibility needs indicate heightened risk or vulnerability, colleagues will consider whether additional safeguarding measures are required. This may include making referrals, initiating safeguarding procedures, or escalating concerns in line with organisational policy.

- **Review accessibility needs as part of ongoing case management**

Accessibility and adjustment needs will be kept under review throughout the life of a case, particularly in situations involving complaints, ASB, tenancy sustainment, or safeguarding. Colleagues will ensure that adjustments remain appropriate and continue to support safe engagement as circumstances change.

This approach ensures that reasonable adjustments are embedded within safeguarding practice, rather than treated as a separate consideration, and supports a proactive, preventative approach to managing risk and vulnerability.

5.3.5 Requesting a reasonable adjustment

Customers can request a reasonable adjustment at any point and through any contact channel, including:

- Phone, email, website, or in writing
- Through Housing Officers, Customer Services, or contractors
- Via a representative, advocate, or support agency

All colleagues are responsible for recognising and recording requests, including where needs are identified through conversation rather than a formal request.

Timescales for decisions

- Requests will be acknowledged within **5 working days**
- A decision will normally be made within **10 working days**
- Where further assessment is required, customers will be kept informed of progress and revised timescales

Assessment and specialist input

- Most adjustments will be agreed based on discussion with the customer
- An Occupational Therapy (OT) or external assessment may be required where:
    - Physical adaptations are needed
    - There is uncertainty about the most appropriate adjustment
    - Funding or statutory assessment thresholds apply
- In these cases, referrals will be made promptly and managed in partnership with relevant agencies

Decision-making and escalation

- Decisions will be evidence-based, proportionate, and compliant with the Equality Act
- Where a request cannot reasonably be met:

    - A clear explanation will be provided
    - Alternative options will be explored with the customer
- Complex or refused cases will be escalated to a senior manager for review prior to confirmation
- Customers can use the complaints process if they remain dissatisfied

6. Training Requirements

All colleagues will receive training at induction, alongside regular refresher training throughout their employment, to ensure a clear understanding of:

- Equality Act duties, including our legal responsibilities to eliminate discrimination and advance equality of opportunity
- Reasonable adjustments, including how to identify, implement, and review adjustments in practice

This training ensures that colleagues have the knowledge and confidence to apply this policy consistently and effectively in their day-to-day roles.

Managers are responsible for:

- Oversight of adjustment decisions, ensuring that decisions are appropriate, proportionate, and aligned with legal and organisational requirements
- Consistent application of this policy, promoting a fair and equitable approach across teams and services
- Quality assurance and escalation, including reviewing complex or sensitive cases, providing guidance to colleagues, and escalating decisions where required to ensure compliance and good practice

Contractors delivering services on our behalf must:

- Comply with this policy and our wider Equity, Diversity and Inclusion commitments
- Make reasonable adjustments as required when delivering services to customers, ensuring accessibility barriers are minimised
- Identify and report accessibility issues or barriers encountered during service delivery, so that appropriate action can be taken and continuous improvement is supported

7. Monitoring and Review

The ongoing application of this policy is monitored by Humans resources and Managers to ensure that it remains up to date and accessible to the relevant audience.

This policy will be reviewed every three years, or sooner if:

- There are changes to legislation or regulation
- Learning from complaints, safeguarding or Ombudsman decisions highlights the need for change

8. Data Protection

Any personal data created, collected, shared or retained in connection with abandonment or tenancy fraud investigations will be processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and Brighter Places' Data Protection Policy and Privacy Notices.

In applying this policy, Brighter Places will ensure that:

- Personal data is processed lawfully, fairly and transparently, and only where there is a clear and legitimate purpose connected with legal and regulatory obligations.
- Only relevant and proportionate information is collected and recorded, and data is limited to what is necessary to establish facts and support decision-making.
- Information obtained from third parties (including neighbours, contractors, local authorities, and partner agencies) is handled sensitively and assessed for reliability and relevance before being relied upon.
- Personal data may be shared with appropriate internal teams, local authorities, law enforcement agencies, fraud bodies, or regulators where lawful and necessary, including for the prevention or detection of crime, recovery of possession, or regulatory reporting.
- Appropriate access controls, security measures, and audit trails are maintained on all systems used to record and store investigation data.
- Personal data is retained only for as long as necessary and in line with Brighter Places' retention schedule, recognising that fraud-related records may need to be retained for evidential, audit, or regulatory purposes.
- Individuals' data protection rights are respected, subject to lawful exemptions that apply in the context of fraud prevention, crime detection, or legal proceedings.
- The lawful basis for processing special category data relates to
    - UK GDPR Article 9
    - Equality act Duty

All colleagues involved in customer facing work must ensure that data protection considerations are embedded throughout the reasonable adjustment process and must seek advice where there is any uncertainty.

9. Equity, Diversity and Inclusion

Where required, reasonable adjustments will be considered to support colleagues to engage with this policy. Please speak to the policy owner for assistance.

Brighter Places is committed to ensuring that this policy is applied fairly, consistently and without discrimination.

In applying this policy, colleagues must have due regard to the Equality Act 2010 and ensure that decisions relating to accessibility and reasonable adjustment are:

- Fair, proportionate and evidence-based, and do not result in unlawful discrimination, either directly or indirectly.
- Sensitive to individual circumstances, including where a tenant or occupier may be vulnerable due to disability, mental or physical health conditions, age, caring responsibilities, language barriers, or other protected characteristics.
- Inclusive and accessible, including consideration of reasonable adjustments to communication, timescales or processes where required to enable engagement with the investigation or review process.
- Informed by safeguarding considerations, particularly where concerns relate to household members who may be at risk, or where absence or non-occupation may be linked to hospitalisation, care arrangements, domestic abuse, or other complex personal circumstances.

Where vulnerability or protected characteristics are identified, colleagues must ensure these are appropriately considered and, where necessary, seek advice from relevant internal teams before progressing enforcement or legal action.

10. Health and Safety

The organisation recognises that health and safety considerations are integral to the implementation of this Equity, Accessibility and Reasonable Adjustments Policy.

In meeting our duty to provide safe, healthy and accessible homes and services, we will ensure that reasonable adjustments are designed and implemented in a way that maintains the safety of customers, staff, contractors and the wider community.

Where adjustments may interact with health and safety requirements, including building safety, fire safety or risk management arrangements, these will be assessed on an individual basis using a proportionate, risk-based approach. Health and safety responsibilities will not be used to unreasonably restrict access, but rather balanced to enable inclusion while preventing foreseeable harm.

We will work collaboratively with customers and relevant professionals to identify solutions that uphold both accessibility and safety, ensuring compliance with relevant health and safety legislation while promoting dignity, independence and equitable access to our services.

11. Summary Roles and Responsibilities

Activities	HoH	Managers	Housing Officers	H&S	DofCS	HR	Gov	All Teams
Owner of the policy	X				X			
Monitoring & review of the policy	X				X	X	X	
Approval of changes to the policy					X	X	X	
Responsible for policy implementation		X				X		X
Addressing issues in the implementation of the policy	X				X	X		X
Version control of live policy							X	
Training of colleagues		X				X		

HoH – Head of Housing

H & S – Health and Safety

D of CS – Director of Customer Services

HR – Human Resources

Gov – Governance Team