



Reasonable Adjustments Policy

Stevenage Borough Council

2024

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| Business Unit and Team | Housing & Neighbourhoods (Corporate Policy & Business Support Team) |
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1. Purpose

- 1.1 Stevenage Borough Council is committed to ensuring that disabled people seeking access to council services are not disadvantaged in doing so, and that reasonable adjustments are considered in order to remove or minimise the disadvantage in-line with the requirements of the Equality Act (2010).
- 1.2 In addition, under the requirements of the Public Sector Equality Duty (PSED) and as set out in the council's Equality, Diversity & Inclusion (EDI) Policy (2022), the council is committed to carrying out its functions in a way that promotes equal opportunity across the 10 protected characteristic groups¹. This includes taking action to remove barriers where it is reasonable to do so.
- 1.3 This policy does not seek to outline how the council will approach every scenario or specific request for reasonable adjustments, these will need to be considered on a case-by-case basis and the process set out in the Operational Procedures of the council's Business Units.

2. Scope

- 2.1 All staff and contractors working on behalf of the Council who have direct contact with service users and have a role in the provision of services are responsible for upholding this policy.
- 2.2 This policy does not cover requests for property adaptations by disabled tenants as this is set out under the Aids and Adaptations Policy (2020). Nor does this policy cover the council's employer responsibilities in regard to recruitment or workplace adjustments, as covered under the Recruitment Policy (2013) and Sickness Absence Policy (2023).

3. Legal and Regulatory Framework

- 3.1 The Equality Act (2010) places a duty on local authorities to make reasonable adjustments for disabled people and comprises the following 3 requirements:
 1. The first requirement is to take reasonable steps to avoid putting a disabled person at a substantial disadvantage² in comparison with persons who are not disabled

¹ Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and Maternity, Race, Religion and Belief; Sex; Sexual Orientation; Socio-economic

² Substantial disadvantage is defined in the Equality Act (2010) section 212(1) as 'more than minor or trivial'.

2. The second requirement is to take reasonable steps to avoid putting a disabled person with a physical feature (for example mobility impairment requiring wheelchair access) at a substantial disadvantage in comparison with persons who are not disabled
3. The third requirement is to take reasonable steps to provide auxiliary aids (for example a piece of equipment such as an induction loop) to avoid putting a disabled person at a substantial disadvantage in comparison with persons who are not disabled

3.4 A disabled person within the meaning of the Equality Act (2010) is an individual who can show they have ‘a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.’ This means there must be evidence of:

- A physical or mental impairment
- That has an adverse effect on the person’s ability to carry out normal day-to-day activities
- The effect of that impairment is substantial, and
- The substantial effect is long-term.

3.5 There is no statutory definition of what is ‘reasonable’, and this will depend on the factors of each case, although the following will usually be considered relevant:

- The cost involved of making any adjustment
- The nature and size of the undertaking
- The practicalities involved in making the adjustment
- The potential effectiveness of any adjustments in removing or reducing the disadvantage suffered by the disabled person when compared to a non-disabled person.

3.6 In addition, under the Equality Act (2010) the council has a legal duty (Public Sector Equality Duty) to carry out its functions in a way that:

- a. Removes discrimination, harassment, victimisation and any other conduct that is unlawful under the Equality Act (2010)
- b. Promotes equal opportunities between people who have a protected characteristic(s) and those who don’t
- c. Encourages good relations between people who have a protected characteristic(s) and those who don’t

Policy

4.1 Stevenage Borough Council is committed to ensuring the way we work does not place people with disabilities at a disadvantage when accessing services. The council therefore commits to making reasonable adjustments to our services if a person is disadvantaged because of their disability.

- 4.2** In carrying out its functions the council is required to understand the needs of its service users and to be able to demonstrate equality in the delivery of services. For example, taking action to eliminate or minimise any disadvantage that a person from a protected characteristic group might have. Requests for reasonable adjustments in relation to protected characteristics will be considered on a case-by-case basis.
- 4.3** A reasonable adjustment involves adapting and making a physical change to a service, premise or work practice to avoid or correct a disadvantage to a person with a disability. As a result, we assess the reasonableness of adjustments depending on practicality, effectiveness and availability of resources. Considerations are made as to whether the changes asked for would overcome the perceived disadvantage effectively, if it would be practical for the changes to be made, if they would be made at the expense of other services, or if we have the available resources to meet the demands of the proposed adjustments.
- 4.4** Service users can request that the council make reasonable adjustments in the following ways:
- in person
 - in writing for example by email or post
 - by telephone
- For further details on how to contact the council, please see Appendix A.
- 4.5** As a council, we will let service users know they can request reasonable adjustments by:
- Publishing this policy on our website
 - Providing information in our Customer Service Centre (CSC) that will make it clear for those who need reasonable adjustments how to request assistance
 - Provide information and support to staff who may be approached by service users requesting reasonable adjustments
 - Provide information on published documents advising how alternative versions can be requested
- 4.6** Whilst we will consider in advance, and on an ongoing basis, how we can make our services accessible to all, the specific adjustments we can provide will be dependent upon each individual's needs. Each person's request and requirements will be discussed with the person concerned to identify and reach an agreement on what is deemed reasonable in each circumstance. These adjustments will be recorded and kept under active review.
- 4.7** Examples of reasonable adjustments include:
- Giving residents the opportunity to be accompanied by a representative when meeting with the council

- Provision of auxiliary aids such as hearing loops and adapted computer software and devices.
- Interpretation service (for example British Sign Language (BSL) interpreter)
- Print off and provision of accessible documents (for example in large print, braille, easy read)
- Arranging for residents to provide details over the phone or in-person rather than on-line or paper copy.

4.8 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. In cases, where the reasonable adjustment request is not agreed, this will require approval by the appropriate Head of Service.

4.9 Whilst requests for adjustments will be considered, it may not be possible for us to provide additional time to customers or make the requested adjustment if there are legislative deadlines or requirements outside of the councils control that we cannot change.

4.10 In accordance with the Public Sector Bodies Accessibility Regulations (2018) accessibility can also mean the use of plain English, incorporating accurate captions, and utilising a set colour palette in all documentation. More information on accessibility and our accessibility statement can be found on our website through the link found in Appendix C.

4.11 If a service user is unhappy with the outcome of a reasonable adjustment request, then a complaint can be made through the council's complaint process. The complaint must be made within 12 months of the problem occurring or the resident becoming aware of the issue. If a complaint is made outside this time limit, it is at the council's discretion if it is to be considered. For more details on how to make a complaint please refer to the council's Complaints Policy (2024).

5. Data Protection

5.1 The council regards respect for the privacy of individuals and the lawful and careful treatment of personal information as very important to delivery of services. The council will ensure that it treats personal information lawfully and proportionately as set out in the General Data Protection Regulation (GDPR) and Data Protection Act (2018). For further information on the council's approach to handling information please see [Data Protection Act \(stevenage.gov.uk\)](https://www.stevenage.gov.uk/data-protection-act)

6. Monitoring and Review

- 6.1** This policy will be reviewed by the relevant Business Unit's Head of Service or Service Manager every 2 years (see page 1 for details of Business Unit) or earlier if there is a change in legislation. Where more than 10% of the policy content is changed the Assistant Director and appropriate Portfolio Holder will be required to decide if the policy needs to be formally reconsidered by the Executive or appropriate decision-making body.
- 6.2** Where there is a request for the content of the policy to be reviewed in response to a complaint, the relevant Business Unit's Assistant Director will be notified. If the Assistant Director agrees that a review of policy is required, this will be discussed with the appropriate Portfolio Holder. The Head of Service or Service Manager will be responsible for implementing a subsequent policy review.

7. References and Resources

[Equality, Diversity and Inclusion Policy 2022 - 2026.pdf](#)

Stevenage Brough Council (SBC) Complaints Policy (2024)

SBC Aids & Adaptations Policy (2020)

SBC Recruitment Policy (2013)

SBC Sickness Absence Policy (2023)

The Equality Act (2010) <https://www.legislation.gov.uk/ukpga/2010/15/contents>

8. Abbreviations

| | |
|------|------------------------------------|
| BSL | British Sign Language |
| BU | Business Unit |
| CSC | Customer Service Centre |
| EDI | Equality, Diversity and Inclusion |
| GDPR | General Data Protection Regulation |
| PSED | Public Sector Equality Duty |
| SBC | Stevenage Borough Council |

9. Appendices

Appendix A [Contacting Stevenage Borough Council](#)

Appendix B [Reasonable Adjustment Policy Equality Impact Assessment](#)

Appendix C [Accessibility Statement](#)

10. Version History

| Date | Outlined Amendments | Author |
|----------|----------------------------|--------------|
| 19/03/24 | Final Draft Approved - SLT | Sally Norman |

Appendix A – Contacting Stevenage Borough Council

If you are having difficulty accessing our services and require support to help you do so, please get in touch with us in one of the following ways:

- Using our online form which can be accessed at:
<https://www.stevenage.gov.uk/have-your-say/compliments-and-complaints>
- Using your My Stevenage online account
- By phone on 01438 242242
- Through a third party, like a relative, support worker or advocate, with your written consent

If you do not have access to online or telephone services please visit the council's office at Daneshill House to use a council computer. Our doors are open between 9am and 5pm Monday to Friday.

If you would prefer to meet with an advisor please book and appointment using the online booking form available at:
https://myaccount.stevenage.gov.uk/service/Customer_Service_Centre_Appointment_Booking