

## Reasonable Adjustments Policy

### Introduction

We recognise that we must take reasonable steps in the way that we work with and provide our services to you if you have a disability, so that you are not disadvantaged compared with people who are not disabled. By law, we have to make reasonable adjustments to our services. These adjustments are often complicated and will vary depending on a person's individual circumstances.

This policy does not cover how we will deal with every situation. Instead, it sets out:

- our commitment to improving accessibility to our services for everybody that we deal with;
- some of the basic principles of our legal duty to provide reasonable adjustments for people with a disability; and
- what we will take into account when dealing with requests for reasonable adjustments.

Many of the arrangements that we offer you may also be made available for those who do not have disabilities. For example, some people may find it easier to read the information we send out if it is in a larger-sized font.

This policy applies to everyone who uses our services, including anyone who has a complaint about a company or trader (and the companies or traders themselves).

### What is a reasonable adjustment?

A reasonable adjustment involves changing the way that we usually do things to make sure that we are fair to disabled people. We may change our usual practice if we find it puts you at a substantial disadvantage. (For example, we may provide our information in alternative formats if it makes it easier for someone to read).

We will not make assumptions about whether you need any adjustments or about what those adjustments should be. We will discuss your requirements with you and try to reach an agreement on what is reasonable and appropriate in the circumstances.

### Our legal duties

Under the Equality Act 2010, we have to provide reasonable adjustments for disabled people. The Act defines disabled people as 'those who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities'. This will sometimes mean that disabled people receive more favourable treatment than non-disabled people, which is allowed within the law in this context.

### **Our duty to make adjustments**

When dealing with consumer disputes, we are providing a service and so have a duty to make reasonable adjustments. This will apply to all parts of our service to the public.

We have a duty to make reasonable adjustments if the way that we provide our services puts you at a substantial disadvantage compared with someone who is not disabled.

This duty also requires us to consider what we can do to overcome anything that might disadvantage you, and whether we can make an adjustment which is reasonable in the circumstances.

We will do our best to agree with you beforehand the reasonable adjustments that we are able to make and tell you when it may not be possible to make an adjustment.

- providing documents or correspondence in a larger font size;
- providing documents on coloured paper or with a specific colour contrast, which can often help people with conditions such as dyslexia;
- allowing a person who has a learning disability or mental-health problem with slightly more time than would usually be allowed to provide further information;
- using email or the phone rather than 'hard copy' letters where appropriate, which may help those with sight difficulties;
- speaking clearly to you and offering you more time to cover the issues you need to discuss;
- using plain English appropriate to the person we are dealing with and avoiding jargon;
- translating documents or correspondence into Braille;
- communicating with you through a representative approved by you, if you ask us;
- helping someone who has mental-health problems to understand and manage the action we are taking by arranging a single point of contact for them with us (where possible); and
- providing access to British Sign Language translations for those with hearing difficulties.

We may need to consider a small number of requests in more detail. There is more information about these below.

### **Our response to requests for reasonable adjustments**

We will usually be able to agree and provide reasonable adjustments with little delay. In some cases, we may need to consider in more detail how best to overcome the difficulty you may be experiencing (for example, if it might be difficult for us to provide the adjustment).

### **How do we decide what is 'reasonable'?**

The Equality Act does not define what is reasonable. However, when deciding whether an adjustment is reasonable, we will take the following into account:

- how effective the adjustment would be in preventing the disadvantage;
- how practical it is for us to make the adjustment;
- the cost and availability of resources, including from outside of our organisation; and
- the extent to which making the adjustment would disrupt our activities.

### **Monitoring**

We will record and monitor the reasonable adjustments that we have made. This will allow us to review the services we provide and help us identify whether there are any other ways we can improve our services.

### **Dealing with complaints about our service**

We are committed to providing a high standard of service and dealing with everyone in a way that is fair and does not discriminate. If you are not satisfied with the arrangements that we have made for providing reasonable adjustments, we will deal with it in line with our complaints procedure.

