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## 1. Purpose

- 1.1. Lewisham Council is committed to delivering high-quality, accessible housing services to all residents. We recognise that individuals may choose to contact us through various channels; however, the quality and consistency of the service provided should remain the same, regardless of the method of contact.
- 1.2. We are dedicated to ensuring equal access to our housing services for everyone, regardless of their circumstances. We recognise our legal obligation under the Equality Act 2010 to remove barriers that may place disabled people at a disadvantage, and we are committed to making reasonable adjustments to ensure equal access to our services. This includes support for individuals with physical or mental health conditions, learning disabilities, and language or communication difficulties.
- 1.3. This Reasonable Adjustments Policy outlines our approach to supporting accessibility. It explains what a reasonable adjustment is, how residents can request one, what forms these adjustments might take, and the factors the Council considers when assessing such requests.
- 1.4. An Easy Read version of this policy is available on our website. If needed, we can also provide the policy in alternative formats- such as braille, large print, or with the support of a language interpreter- upon request.

## 2. Scope

- 2.1. This policy applies to all housing services provided by Lewisham Council. This includes services delivered as part of our statutory housing functions to residents within the borough, services provided to residents for whom the Council is also the landlord, as well as any residents who approach our housing services for support or assistance.
- 2.2. For the purposes of this policy, reasonable adjustments refer to changes made or requested to usual practices or the delivery of housing services, in

order to reduce the disadvantage that disabled people may face in accessing them. These adjustments are focused on how we provide or facilitate access to our services. (*Note: This policy does not cover physical adaptations to properties owned and managed by the Council. For information on adjustments to the home environment, please refer to our separate Aids and Adaptations Policy*).

- 2.3. While the main focus of this policy is to support equal access to services for disabled people, reasonable adjustments may also be appropriate in other circumstances where a disability is not present, but another barrier to accessing services exists.
- 2.4. The term 'reasonable' reflects what can be accommodated within the Council's available resources, operational efficiency, and practical responsibilities. While there may be instances where certain requests cannot be fulfilled, we will always provide an explanation and explore alternative ways to support access wherever possible.
- 2.5. This policy does not aim to detail how the Council will respond to every situation in which a resident may require an adjustment to a service. It should be read alongside other relevant policies, statutory duties, and contractual obligations, which may include other specific adjustments for residents (such as priority repair timeframes, as outlined in our Vulnerable Residents Policy). The adjustments made will depend on the individual's specific needs and circumstances. For common examples of adjustment requests, see Section 3 below.

### 3. Requests for reasonable adjustments

As referenced in the earlier section, for the purposes of this policy- reasonable adjustments refer to changes made or requested to usual practices or the delivery of housing services, in order to reduce the disadvantage that disabled people may face in accessing them. These adjustments are focused on how we provide or facilitate access to our services.

This section explains how residents can request reasonable adjustments, outlines the factors the Council will consider when reviewing a request, and provides common examples of the types of adjustments that may be made.

#### 3.1. Who can request a reasonable adjustment

Any resident engaging with Lewisham Council's housing services can request a reasonable adjustment. This includes individuals accessing services through our statutory housing functions, those for whom the Council is the landlord, and anyone seeking support or assistance from our housing teams.

Under the Equality Act 2010, we have a legal duty to make reasonable adjustments to remove barriers that may place disabled people at a disadvantage. This ensures fair and equal access to our services.

While the primary focus of this policy is on supporting disabled residents, we may also consider reasonable adjustments in other situations where a disability is not present but a resident faces a different barrier to accessing services. Although not a legal requirement in such cases, we will assess these requests and provide support where appropriate and feasible.

### 3.2. How to request a reasonable adjustment

3.2.1. Residents may request reasonable adjustments through any member of staff they interact with, using any of the following methods:

- in-person
- in writing- for example by email or post
- by telephone
- through an authorised third party, where we have permission to do so

3.2.2. While you can request a reasonable adjustment through any member of staff you contact about a housing service, you may also use the following email addresses if you have any general queries related to reasonable adjustments, based on your circumstances:

- Council tenants: [HousingManagement@lewisham.gov.uk](mailto:HousingManagement@lewisham.gov.uk)
- Leaseholders: [HOS@lewisham.gov.uk](mailto:HOS@lewisham.gov.uk)
- Residents in temporary accommodation: [ta.mgmtandresettlement@lewisham.gov.uk](mailto:ta.mgmtandresettlement@lewisham.gov.uk)
- Residents seeking housing needs services: [housingoptionsenquiry@lewisham.gov.uk](mailto:housingoptionsenquiry@lewisham.gov.uk)
- Private Rented Sector residents: [pshe@lewisham.gov.uk](mailto:pshe@lewisham.gov.uk)

3.2.3. When requesting a reasonable adjustment, please briefly explain why the adjustment is needed, the impact the current situation has on you, and the type of adjustment you are seeking. This information helps us understand your circumstances and consider how best to support your access to our services.

### 3.3. What We Will Consider When Assessing a Request

3.3.1. When considering a request for a reasonable adjustment we will take into account the following:

- The nature of the disability or disadvantage- what is the barrier to access and the potential impact if the adjustment is not made.
- Will the requested adjustment be effective – i.e. will it help to reduce or overcome the disadvantage experienced.
- How feasible and reasonable it is to implement the change with the resources we have available.
- Will making the requested change have a noticeable adverse impact on the wider delivery of the service.

- What alternative solutions are already in place or could be considered, including external provision or assistance.

3.3.2. We aim to be proactive in identifying when adjustments might be needed, but we won't assume what kind of adjustment is best for you. We'll do our best to meet your request and may suggest other options if we think they could help. We'll consider every request and talk with you to explore possible alternatives if needed.

3.3.3. Where a reasonable adjustment is agreed upon, we will aim to implement it without unnecessary delay, provided it is also reasonable and practical to do so.

3.3.4. In some cases, we may decide that a request cannot be met. The law requires adjustments to be made where they are considered reasonable. If we are unable to agree to a request, we will clearly explain the reasons and, where appropriate, suggest alternative adjustments. All requests and decisions will be recorded.

### **3.4. Examples of reasonable adjustments**

3.4.1. Examples of reasonable adjustments that residents may request include, but are not limited to, the following:

- Providing information in larger print or in a specific colour contrast to aid those with visual impairments or dyslexia, or in an alternative format to aid those with learning or cognitive disabilities.
- Providing sign language, interpretation or other communication support.
- Allowing extra time for appointments for those with communication or mobility difficulties.
- Allowing extra time for responses or providing alternative means of communication for those with communication difficulties.
- Holding events/meetings in a range of formats, including online and in person. Where held in person, ensuring that facilities are accessible.
- Engaging with a nominated advocate or support worker on behalf of the resident, where appropriate, to help facilitate communication or decision-making.

## **4. Ensuring Accessible and Inclusive Services**

4.1. We aim to ensure our services are accessible to everyone who needs them. To support this, we are committed to continuing the following actions:

- Provide a range of ways for residents, housing applicants, and others to access our services and contact us

- Offer alternative communication formats on request, such as braille, large print, or access to a language interpreter
- Encourage our staff to get to know residents, and share relevant information or feedback about their needs
- Record relevant information, in line with GDPR, to help us anticipate and adjust future services to individuals
- Analyse and learn from resident feedback, previous requests, complaints, as well as good practice from other organisations on adjusting their services
- Explore ways to diversify our services to meet the needs of residents, where practical and where it does not negatively affect our ability to deliver them

4.2. While we will strive to be proactive in identifying when adjustments are required, we recognise that people's needs can change over time. We therefore encourage individuals to let us know if they require an adjustment, and will regularly check for signs of vulnerability, and review whether previous adjustments are still appropriate.

## 5. Legislation and regulation

The following legislation and regulations are particularly relevant to the scope and application of this policy:

### 5.1. The Equality Act 2010

Under the Equality Act 2010, a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to carry out normal day-to-day activities. 'Substantial' and 'long-term' means:

- 'substantial' is more than minor or trivial, for example it takes much longer than it usually would to complete a daily task like getting dressed
- 'long-term' means 12 months or more, for example a breathing condition that develops as a result of a lung infection

The Act also includes special rules for conditions that are recurring or fluctuate over time, such as arthritis. Additionally, individuals with progressive conditions, those that worsen over time, can also be classified as disabled under the Act.

The Equality Act 2010 establishes a legal framework to protect individual rights and promote equality. Under Section 20, there is a duty to make reasonable adjustments to avoid substantial disadvantage for disabled people. This duty applies in three situations:

- When a provision, criterion or practice places a disabled person at a substantial disadvantage compared to non-disabled people
- When a physical feature creates such a disadvantage
- When, without an auxiliary aid, a disabled person would be at a substantial disadvantage

### 5.2. The Regulator of Social Housing

According to the Regulator of Social Housing's Consumer Standard: Transparency, Influence and Accountability, registered providers must ensure tenants have access to clear and accessible information about their rights in relation to the provider's legal obligations and relevant regulatory requirements concerning homes, facilities, and landlord services. This includes a specific requirement to inform tenants about the rights of disabled tenants to reasonable adjustments.

### 5.3. The Housing Ombudsman

The Housing Ombudsman's Complaint Handling Code became statutory on 1 April 2024. One of the key areas of focus within the Code is 'Accessibility and Awareness', which aims to ensure that all residents can easily access the complaints process.

Under this section, landlords must make it easy for residents to complain by providing multiple channels for submitting complaints. Landlords must also consider their duties under the Equality Act 2010 and anticipate the needs of residents who may require reasonable adjustments to engage with the complaints process effectively.

Our complaints policy and practices have been reviewed and updated in the light of this statutory code.

### 5.4. Data Protection

We are committed to ensuring that individuals' privacy is protected and will only collect, use and store personal data in line with the Data Protection Act 2018, and in line with our Data protection policy.

We will only use information supplied, for the purpose intended – in the context of this policy that is to consider and provide a reasonable adjustment. If we need to use personal data for an unrelated purpose, we will notify them, and we will explain the legal basis which allows us to do so.

## 6. Equality, diversity, and inclusion

6.1. An Equality Analysis Assessment (EAA) was undertaken during the development of this policy.

6.2. Older adults are more likely to require adjustments to access services. The introduction of a formal framework for requesting and assessing reasonable adjustments will support equitable access and enhance service delivery for this group.



- 6.3. Disabled residents will benefit from a clear policy that outlines the process for requesting reasonable adjustments, helping to ensure fair access to housing services and improved outcomes.
- 6.4. Individuals with physical or mental health conditions may also require reasonable adjustments. A clear and consistent policy will support these residents by ensuring they understand how to request adjustments, promoting fair access and better outcomes.
- 6.5. Overall, the EAA indicates that the policy is expected to have a positive impact on residents by ensuring they can access services in ways that meet their needs and support equal outcomes.

## 7. Communications

- 7.1. This policy will be published on Lewisham Council's website, alongside other housing policies.
- 7.2. We will ensure that housing staff stays informed about the principles of reasonable adjustments to ensure they can deliver an inclusive service to all residents. This policy will also be accessible to staff via the staff intranet.
- 7.3. We may from time to time, seek residents' views on how we can provide a more accessible service, or request specific feedback about an adjustment we have made, in order to help us to continue to improve our services.
- 7.4. Where an individual is unhappy with our response to a request for reasonable adjustments, or with the adjustments made, they may submit a complaint in line with our housing services complaints policy- [Lewisham Council - How to send us a complaint or feedback](#)

## 8. Reviewing this policy

Amendments to this policy not reflecting a major change of policy may be made by the Executive Director for Housing in consultation with the Director of Law and Corporate Governance. Such changes will be reported to Members annually.

<b>New:</b> Reasonable Adjustments Policy 2025 (v 1.0)	
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<b>Next review:</b> September 2027	
<b>Approved by:</b> Mayor and Cabinet	
<b>Policy owner:</b> Director of Housing Resident Engagement and Services	