

Communication and Reasonable adjustments Policy

Summary

We are committed to providing a high standard of service to all our residents. We will deal with everyone in a way that is respectful, unbiased and free from discrimination and disadvantage and look at how we can adapt our service and communication to meet individual needs, where reasonably possible.

This policy specifically focuses on our statutory duty as a Landlord. This complements the Equality, Diversity and Inclusion (EDI) Strategy, reasonable adjustment statement and customer promise for Portsmouth City Council and our Portsmouth Homes Equality, Diversity and Inclusion Policy.

This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our commitment and to provide guidance on meeting individual needs covered by the Equality Act 2010 through offering appropriate adjustments and communication for all.

Effective date

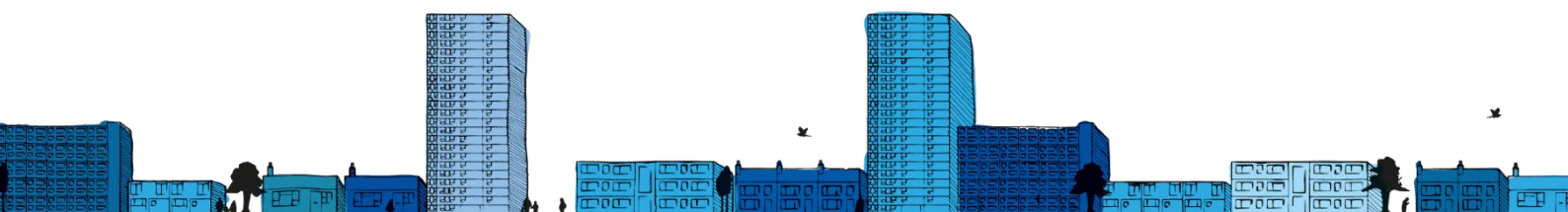
1 June 2025

Review

We will review this Policy every 3 years or when there has been an update to legislative, regulatory, best practice or operational changes.

Version

Version 1.0



Communication and Reasonable adjustment

Policy contents

Summary	1
Effective date.....	1
Review	1
Version	1
Communication and Reasonable adjustment Policy contents	2
Scope	3
Customer Promise	3
Our approach.....	4
Reasonable Adjustments Duty (Equalities Act 2010)	4
How do we decide what is reasonable?	4
Example of Reasonable Adjustments	5
What is an additional need?	6
How will we identify any additional needs?.....	6
What to expect from us	7
Record keeping.....	8
Information Sharing.....	8
Your voice	9
What have we done to make sure this Policy is fair?	9
Regulation and legislation	9
Related documents	10
How to feedback	10
Compliments	10
Complaints	10
Housing Ombudsman Service	10



Scope

This policy applies to anyone who requests or who receives services and communication from us as the Landlord, which include:

- Tenants, Leaseholders, shared owners and members of their household
- Someone acting on behalf of the above with their consent

Any reference in this policy to 'we', 'our' or 'us' refers to Portsmouth Homes.

Any reference in this policy to 'tenant', 'customer' or 'resident' refers to a Portsmouth Homes tenant, leaseholder, shared owner or household members.

Customer Promise

Portsmouth Homes supports the Portsmouth City Council customer promise, which sets out our commitment to providing the best possible customer service. Our staff will treat you with respect, and we ask that residents treat us with respect in return and follow the guidance around what we expect from our residents.

What to expect from us

- we will listen to you
- we will try our best to resolve your enquiry quickly and if we can't, we will pass it to the right place and tell you what is happening
- we will do what we say we are going to do
- we will be polite, helpful, and respectful
- we will explain things clearly in a way that is easy to understand
- we will take the needs of individual residents into account, and adapt our approach to meet your needs

What we expect from our residents

To help us to help you and provide you with the best possible service and keep our customer promise, we expect you to treat our staff and other residents with respect, even if we can't always provide you with the response you would like.

That means we won't accept the following behaviour:

- being aggressive, including being verbally aggressive and shouting
- using rude, discriminatory, or abusive language when communicating with our staff
- any form of harassment of our staff, whether that's in person or via other channels like email and social media, including contacting them repeatedly
- filming or recording of staff without their consent



Our approach

This Policy defines what a 'reasonable adjustment' is, it describes in what type of circumstances we will make them, and how residents can request them.

It sets out how we will make reasonable adjustments to our services, and communications with, residents who have a mental or physical disability, in compliance with the Equality Act 2010 or additional needs. This includes requests from residents to modify the way we provide a service.

We will explain how we manage requests, record the data and how we use this sensitive information to adapt the service to meet resident's needs, where proportionate, legal, appropriate and necessary.

We understand that what may seem like a small change to some, may be a much more important, serious or urgent to others. It is important that we understand the needs of residents that live in our properties, so we are able to effectively respond to their specific requirements.

Reasonable Adjustments Duty (Equalities Act 2010)

Under the Equality Act 2010, there is a legal duty for us to make sure that a disabled person can where reasonably possible access our services as easily as non-disabled people.

If we find there are barriers to disabled people in the way we do things, then we must consider making adjustments. If those adjustments are reasonable for us to make, then we must make them.

We use the definition of a disability set out in the Equality Act 2010. This states a person is disabled if they have a physical or mental impairment, and the impairment has a substantial and long-term effect on their ability to carry out normal day-to-day activities.

There is a similar duty concerning the physical features of the home. This is covered in our Aids and Adaptations policy.

How do we decide what is reasonable?

When deciding whether an adjustment is reasonable we can consider:

- How effective the change will be.
- Whether it can actually be done.
- The cost of the change.
- The available resources.

The duty is 'anticipatory'. This means we cannot wait until a disabled person wants to use the services but must think in advance (and on an ongoing basis) about what disabled people with a range of impairments might reasonably need, such as people who have a visual impairment, a hearing impairment, a mobility impairment or a learning disability.



Example of Reasonable Adjustments

A reasonable adjustment can be a small change that can help people to access services to meet their specific needs.

It could be how our services interact with residents, or things that are needed when accessing appointments or visits. **It is the residents right to ask for reasonable adjustments to be made.**

We acknowledge and understand that having a disability or additional need, does not automatically mean a person may need or want any reasonable adjustments. In addition, they may not be permanent and may change depending on individual circumstances, therefore they can be removed or added as appropriate.

It is not possible to produce an exhaustive list of reasonable adjustments since an adjustment can only be determined as reasonable or not in relation to a specific set of circumstances.

A reasonable adjustment could be:

- A physical alteration to one of our buildings, for example, an adaptation which includes fitting a lift, wide doors, or a ramp in line with our Portsmouth Homes policies.
- An adjustment to how we communicate with our residents to meet their specific needs. For example, providing information in following up a summary of the interaction, regular updates, alternative formats, languages or making contact in the preferred way.
- Give 24 hours' notice of any appointments and / or pre-appointment communication
- Allowing more time to explain repairs or installations to a customer
- Allowing more time to understand information and / or make decisions (where lawful to do so)
- Working with representatives acting on behalf of the customer, with consent.
- Having a Single point of contact (SPOC), if agreed

We will not make assumptions about whether the customer requires any reasonable adjustments or what those adjustments should be.

A hidden disability is a disability that may not be immediately obvious. Hidden disabilities don't have physical signs and include learning difficulties, mental health as well as mobility, speech, visual or hearing impairments.

You do not need to have a registered or diagnosed disability to request an adjustment to our service or preferred method of communication, many are available to all our residents for example, documents in larger font than our usual font or no calls before 10am.

There is no prescribed list of reasonable adjustments or communication, it will depend on the individual needs. We will discuss with the person concerned and seek to reach an agreement on what may be reasonable in these circumstances. If we are unable to accommodate the adjustment, we will communicate the reason why this has not been possible.



In most cases, we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases, we may need to consider how best to overcome the barrier a person with an additional need is experiencing or seek advice from expert disability organisations that can assist with potential solutions, signposting and other forms of support that may help.

For some changes, particularly where significant changes are being made, we may ask for some supporting information about the customer's disability to enable us to make the decision.

Where there is likely to be a period of delay before we can make a reasonable adjustment we will work with the individual concerned to put things in place to mitigate the impact on them as far as reasonably possible.

What is an additional need?

An additional need is where someone (including a member of their household) with any condition or circumstance that either:

- Places them at risk in their home
- Puts them at risk of being unable to comply with the conditions of their tenancy / lease without additional support
- Affects their ability to access our landlord services.

An additional need may be caused by physical, emotional or personal circumstances, timing, and may already have an existing supports in place. This is why it is important that we review our residents needs on a case-by-case basis.

How will we identify any additional needs?

This may be identified by:

- Residents informing our staff
- Any member of our staff who has contact with the resident either in person, or through any other channel of communication
- Our contractors when visiting our residents in their homes
- A referral from an external agency or organisation

Residents will be asked at the start of their tenancy whether they, or any household members, have any additional needs and / or they require a reasonable adjustment or preferred way of communication and this will be reviewed annually.

During interactions with residents throughout the tenancy, we may identify additional support needs or requirements for reasonable adjustments that could be offered to the resident.



What to expect from us

We expect staff and contractors working on our behalf to seek to understand the needs of our residents and adjust how they deliver services and communicate to meet their needs, where necessary and legally possible.

We are committed to assisting, ensuring and maintaining a high standard of accessibility to our services for residents, ensuring they are not at a disadvantage.

We will:

- Ensure residents are aware of any support that we can offer and what is available. Ensure this is published in suitable ways ie. House talk, website, Offices, through interactions with our staff
- Work to keep our systems up to date and data is recorded accurately, so residents **do not** need to continuously request their reasonable adjustment or preferred way of communication.
- Ask residents for their preferred method of communication and using it where possible (There are some legal documents that have to be served in writing)
- Consider each request individually, aiming to agree and provide appropriate reasonable adjustments when required.
- Provide training for staff to fully understand the obligations and responsibilities towards our residents to enable them to confidently recognise and initiate conversations about reasonable adjustments in the appropriate way and will not make assumptions about what those adjustments should be.
- Treat residents with courtesy, fairness and respect and ensure they are listened to and adapting our services and communications, where possible
- Deal with requests sensitively and respectfully, whilst recognising that it may be difficult to recognise that they require additional support, whether that be long or short term.
- Work with support workers, advocates, family members, or other professionals with the consent to share from the resident (where possible), to ensure any necessary support or reasonable adjustment is in place.
- Make appropriate referrals ie. safeguarding
- Take into account known vulnerability factors in the provision of services and decision making around tenancy management and enforcement action
- Ensure we publish this policy on the website for transparency and include information in HouseTalk and on printed information, where appropriate
- Allowing more time to understand information and / or make decisions (where lawful to do so)
- Providing information in alternative formats to meet the customer's needs

We will do all the above where it is lawful to do so.



Staff may signpost to different policies dependent on the need and support required ie. Aids and Adaptations, safeguarding etc. This support may be delivered by us or through referral to specialist agencies.

Where there is a risk of harm, abuse, or neglect to residents, we will follow our Safeguarding policy and / or Domestic Abuse Policy, where appropriate.

In relation to Supported and Sheltered Housing, the services provided may mean there are additional processes in place, to complement this policy.

Record keeping

We will advertise how to request reasonable adjustments, and will log any adjustment made, ensuring our records are up to date and accurate.

We will record the following information:

- Date and details of the request, or adjustment that has been identified
- Details of any adjustment made
- Date adjustment provided / implemented
- Reasons from providing / implementing an adjustment
- Reasons for not providing / implementing an adjustment

If a resident or household member has a reasonable adjustment or preferred method of communication, we will use this information wherever possible to deliver services that meet their individual needs and help them access appropriate support and used for relevant purposes in line with the privacy notice issued and available online.

During any contact with us, we may ask about a resident's needs, and with consent, this will be collected, stored safely, securely and will be shared for relevant purposes and staff who provide a service and come in contact with the resident. There is no requirement for the information to be shared with us, however if we are unaware, we are unable to adapt our service and communications to meet individual needs.

Having accurate records allows us to have greater oversight of any issues that residents face and an understanding on how that will impact them.

At any time, residents have the right to withdraw consent for processing your data, to do this, they can speak to a member of staff in Portsmouth Homes.

Information Sharing

When sharing information about residents outside of the service, we will only do this if you have given your consent or where the law allows or requires us to, and we will comply with the Data Protection Act 2018 and all relevant privacy notices.



Your voice

We provide tenants a wide range of meaningful opportunities to engage, influence and scrutinise the Landlord Strategies, policies and services, to include participation in regular resident meetings and give feedback on services and policies.

We will record and monitor the preferred way to communicate and / or 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.

If you would like to be included in future resident engagement focus groups and would like to know how to get involved, please contact us for more information:

You can contact our team by:

- Email: housing.engagement@portsmouthcc.gov.uk
- Phone: 02392 834835
- Website: visit the [Resident engagement and community resources on our website](#)

What have we done to make sure this Policy is fair?

We completed an Integrated Impact Assessment (IIA) to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#). This Policy should have direct and positive equality and diversity impacts.

Regulation and legislation

We recognise the variety of legislation, and we will continue to monitor relevant legal guidance. The list below reflects some of the existing legal framework and relevant publications:

- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Landlord and Tenant Act 1985](#)
- [Housing Act 2004](#)
- [Social Housing \(Regulation\) Act 2023](#)
- [Regulatory standards for landlords](#)
- [Care Act 2014](#)
- [Data Protection Act 2018](#)



Related documents

This policy should be read in conjunction with:

- Portsmouth Homes Landlord Policies, Strategies and Reports - [Housing policies, strategies and privacy notices](#)
- Tenancy Agreement / Leasehold Agreement
- [Equality and diversity - Portsmouth City Council](#)
- [Our customer promise - Portsmouth City Council](#)
- [Corporate complaints policy - Portsmouth City Council](#)

How to feedback

If you have any questions around the policy or would like to know more about its application, please contact the relevant service in the first instance.

You can get this policy in large print, braille, audio or in another language by contacting your Housing Office. More information is available [translation, interpreting and audio information](#).

Compliments

To help us provide the best service we can. We would like to hear customer views on the services that they use. If the customer is pleased with a member of staff or service, please let us know.

- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk

Complaints

If a customer is unhappy, they can refer to our Landlord Complaints Policy.

- Online complaint form at [Make a housing complaint](#)
- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk
- [Landlord complaints policy](#)

Housing Ombudsman Service

If a customer is unhappy, they can contact the Housing Ombudsman Service for advice and guidance at any time.



- Online complaint form on [the Housing Ombudsman Service website](#)
- Telephone: 0300 111 3000
- For more information, visit [Housing Ombudsman's Complaint Handling Code](#)

