



# Reasonable Adjustments Policy

## 1. Aim of policy

We are committed to ensuring that our services are accessible for all our customers. This policy is intended to provide guidance on meeting individual needs covered by the Equality Act (2010) through offering appropriate, reasonable adjustments and reflects our responsibilities under the Energy Act (2023) and the Heat Networks (Market Framework) Regulations (2025), ensuring appropriate support for heat-network customers.

The Equality Act primarily focuses on reasonable adjustments to be made for individuals with disabilities. This includes any physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. To align with the regulatory framework, our policy extends our approach to reasonable adjustments to other circumstances that may not be strictly defined as disabilities under the Act. This includes vulnerability and diverse needs which require special consideration to ensure accessibility and equitable outcomes, such as translation or other requirements.

It is also to ensure we continue to deliver high standards in customer service, meet customers' needs and align these standards with those set out in our Equality and Diversity and Inclusion Framework.

The aim of the policy is to:

1. Articulate our commitment to improving accessibility for all our customers
2. Set out the principles of our commitment to provide reasonable adjustments for customers who require them.
3. Details what factors we will consider when dealing with requests for reasonable adjustments.
4. Ensure we continue to deliver high standards of customer service in alignment with our approach to equality, diversity and inclusion.
5. Ensure that customers who receive heat through a heat network and who may be in vulnerable situations related to their heat supply are supported through appropriate reasonable adjustments in line with regulatory expectations.

## 2. Scope of policy

This policy sets out the approach we will adopt when tailoring our services to meet the individual needs of customers with diverse needs and vulnerabilities.

The policy applies to services we deliver rather than VIVID as an employer.

The policy should be read in conjunction with other related policies as detailed in Section 6.

We can provide reasonable adjustments in circumstances which are not defined as a disability according to the Equality Act but will make services accessible to customers with special need or circumstance.

The scope also includes customers with vulnerabilities arising from heat supplied through heat networks regulated by Ofgem, where additional support may be required to maintain safe and reliable access to essential heat.

## 3. Policy statement

We're committed to ensuring that the services we provide are accessible, inclusive and meet the diverse needs of our customers.

This policy outlines our legal and regulatory obligations and provides guidance on our approach to making reasonable adjustments to ensure our services are inclusive and accessible for customers who have diverse needs and vulnerabilities.

The Equality Act 2010 provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. We commit to comply with the provisions for public bodies under the Act.

Under the Act the legal duty to make reasonable adjustments arises in three circumstances:

1. When changing a policy, procedure or any standard practices.
2. Where a physical feature puts a disabled customer at a substantial disadvantage in comparison with customers who are not disabled.
3. Where a disabled person, without the provision of an additional aid or service, would be put at a substantial disadvantage\* in comparison with customers who are not disabled.

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

The Heat Networks (Market Framework) Regulations 2025 set out requirements for customer service, fair treatment, billing transparency, complaint handling and support for vulnerable customers. We are committed to meeting these obligations and ensuring customers receive accessible, fair and reliable heat services, with tailored support where needed.

In addition we are committed to providing appropriate support to our customers and this forms part of our wider commitment to ensuring our services meet the expectations contained within the Regulator of Social Housing's Consumer Standards, the Housing Ombudsman's Complaint Handling Code, the Energy Ombudsman's Complaint Handling Code and published guidance outlining the requirement for landlords to recognise vulnerabilities, respond to them appropriately with reasonable adjustments and to record the details.

#### 4. Policy

A reasonable adjustment involves making a change to the way we usually do things to take account of the diverse needs and vulnerabilities of our customers. Reasonable adjustments remove barriers and ensure that our services are accessible

Every time a policy is reviewed, or a new policy is introduced we will undertake an equality impact assessment to remove an intended barriers and promote inclusive and accessible services.

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.

However, the relevant Code of Practice suggests that, when deciding whether an adjustment is reasonable, the following factors should be considered:

1. The effectiveness of an adjustment in preventing or reducing the disadvantage – for example, the adjustment should be designed to fully address the disadvantage it is meant to overcome.
2. The practicability of the adjustment – for example, it may not be necessary or practical to have a wheelchair accessible toilet on every floor of an office, providing that at least one such toilet is available to wheelchair users.
3. The financial and other costs of any adjustment – for example, if a customer requests higher specification of an aid or adaptation than the standard item issued, as long as the standard item will

perform the same task – it may be reasonable to refuse on grounds of cost, provided the alternative is suitable.

4. The extent of the disruption caused – for example, it would not be practical for a staff member to devote all of their time to one customer, as other customers would inevitably suffer.
5. The availability of financial or other assistance – for example, a grant for funding may be available to supplement any adjustment needed.

Some of the examples of reasonable adjustments we can provide are as follows:

- Providing an accessibility tool on our website and facilitating online access to our services.
- Services on our online account and website enabling customers to adjust the pages to meet their accessibility needs.
- Providing translation or interpreting services for customers whose first language is not English, including sign language interpretation.
- Providing additional support for customers with literacy challenges; (eg provision of auxiliary aids such as coloured overlays).
- Adjusting the priority of repairs where the impact of the fault is disproportionate due to a household member's vulnerability (including vulnerable heat customers).
- Providing adaptations to customer's homes to meet disability needs in accordance with our adaptations policy.
- Provision of information in appropriate alternative formats (eg large print, coloured paper, providing voice recordings of information for customers to retain etc).
- Extension of time limits (where it is lawful to do so).
- Calling customers to explain the content of letters before sending them.
- Use of email or telephone in preference to hard copy letter.
- Consideration around neurodiversity and how this may impact accessibility to services.
- Use of plain English or Easy Read service.
- Communication through a representative or intermediary.
- Rest or comfort breaks in meetings, and
- The gender of staff visiting customers based on customer need (eg female visiting female).

To ensure the effective delivery of our approach we will adopt the VIVID CARES framework as follows:

C-Consider vulnerability and diverse needs

A-Actively listen to get the full picture

R-Recognise every situation is unique

E-Employ empathy and understanding

S-support each other to do the right thing

Supporting customers with heat-related vulnerabilities:

We recognise that some customers may experience vulnerability related to their heat supply. We will provide reasonable adjustments and appropriate support to ensure continued access to essential heat, particularly for those in vulnerable circumstances. We will communicate clearly, take individual needs into account, and work with relevant teams and partners to provide support in line with applicable regulatory requirements.

## 5. Statutory requirements

The policy is being introduced as a supplement to the Equality, Diversity and Inclusion Policy to ensure we meet the Housing Ombudsman Service Guidance and to comply with the legislative and regulatory framework governing heat networks.

<b>6. Related policies</b>
<p>Equality, Diversity and Inclusion Policy          Adaptations policy          Customer influence strategy          Complaints policy          Data Protection Policy</p>
<b>7. Monitor and review process</b>
<p>The Policy will be reviewed annually with customers, in conjunction with the Equality, Diversity and Inclusion Policy.</p> <p>The policy will be monitored in accordance with the Equality, Diversity and Inclusion Policy  <b>Policy review or implementation includes the completion of an Equality Impact Assessment to ensure the removal of any barriers and to promote inclusive and accessible services.</b></p>
<b>8. Equality Impact Assessment</b>
<b>9. References/appendices</b>
<p>The Equality Act 2010 - <a href="http://www.legislation.gov.uk/ukpga/2010/15/contents">http://www.legislation.gov.uk/ukpga/2010/15/contents</a>          The Energy Act 2023 - <a href="https://www.legislation.gov.uk/ukpga/2023/52/contents">https://www.legislation.gov.uk/ukpga/2023/52/contents</a>          The Heat Networks (Market Framework) (Great Britain) Regulations 2025 - <a href="https://www.legislation.gov.uk/uksi/2025/269/contents">https://www.legislation.gov.uk/uksi/2025/269/contents</a></p>

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