



Vulnerable Person and Reasonable Adjustments Policy

Scope:	This policy applies to all employees of the council and customers living within the borough, including tenants and leaseholders.
Effective Date:	June 2024
Review Date:	June 2027 (or sooner if there are changes to guidance and legislation)
Author:	Assistant Director (Customer Services & Transformation)
Policy Owned by:	Executive Director (Finance & Transformation)
Statute:	Equality Act 2010
National Standards and Guidance	Housing Ombudsman Spotlight on Attitudes, Respect and Rights Housing Ombudsman Relationship of Equals
Related Policies	Complaints Policy Unreasonably Persistent and Abusive Behaviour Policy Equality, Diversity and Inclusion Strategy Aids and Adaptations Policy Corporate Enforcement Policy Anti-Social Behaviour Policy Damp and Mould policy Decant Policy Domestic Abuse Policy Housing Responsive Repairs Policy Mutual Exchange Policy Private Sector Housing Assistance Policy Rent Arrears Policy Succession Policy

1 Introduction

- 1.1 This policy sets out the council's commitment to supporting vulnerable customers so they can access our services and receive the assistance they need.
- 1.2 This policy encompasses all customers living within the borough, including tenants and leaseholders.

2 Definition of Vulnerability

- 2.1 Our overall definition of vulnerability is:

'A dynamic state which arises from a combination of a customer's characteristics and personal circumstances.'

- 2.2 This definition recognises that individual's relevant vulnerabilities can interact with an individual's situation and therefore can change over time.

- 2.3 Additionally, in our role as a landlord, we acknowledge that poor housing can impact on all aspects of life and in some cases can directly cause resident's vulnerabilities. With this in mind, and when dealing with our tenants and leaseholders, we will adopt the full definition of vulnerability as identified by the Housing Ombudsman.

'A dynamic state which arises from a combination of a resident's personal circumstances, characteristics, and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint... if effective reasonable adjustments have been put in place, the vulnerability may be reduced.'

- 2.4 Whilst not exhaustive, some common factors of vulnerability are provided in Table 1.

Table 1: Common Vulnerability Factors

Underlying Characteristics (people may not always require additional support due to this characteristic):
Older people
Younger people
Disabled people/Families with disabled people
Carers (non-professional)
Lone parents under 21
Those living with a terminal illness
Ability to engage:
Learning disability
Mental illness

Impaired mobility
Health conditions
Addiction
Low/no English skills
Low level of literacy
Exceptional Life Event (an event that might make a customer vulnerable at this point in time):
Homelessness
Bereavement
Recently left care
Pregnancy
Debt
Abuse
Recently released from prison
Families with children excluded from school
Refugees/Asylum Seekers
Ex-service personnel

3 Our interactions with Customers

- 3.1 Through our interactions with our customers, we need to be able to recognise, respond and record vulnerabilities.
- 3.2 We understand that our customers will not always want to disclose their vulnerabilities to us but we will encourage our customers to be open with us by listening to their concerns and ensuring requests for support are not ignored.
- 3.3 Staff will also use clues, communication, and professional curiosity to recognise potential vulnerabilities as appropriate.

4 Our Staff

- 4.1 All staff are required to attend mandatory Equality & Diversity and Safeguarding training.
- 4.2 We offer additional tenancy support to tenants and signpost customers to a range of support services as required.
- 4.3 To support our own staff, we have a pool of Mental Health Champions to provide staff support and signposting.

5 Data Protection and Data Management

- 5.1 Where appropriate, vulnerabilities will be recorded in different systems. This will help staff to support customers and tenants to access our services and used to meet the customers need. Information that has no impact on the way we provide services and customer care will not be recorded and stored.
- 5.2 At the start of a tenancy with us, customers will be asked to confirm their support needs and communication preferences.
- 5.3 Information on a customers' vulnerability will be shared between service teams when it is in their best interest. For example, if a tenant requests an assisted waste collection, it is recognised it would be good practice to share this information with their neighbourhood officer.
- 5.4 Personal and sensitive data will be managed in line with our Data Protection Guidelines.

6 Safeguarding

- 6.1 We are committed to safeguarding children, young people and adults at risk who live in the community. All staff are required to attend safeguarding training and will report all incidents or concerns they have relating to the wellbeing of an individual.

7 Reasonable Adjustments

- 7.1 We make a commitment to always communicate in plain English and will record a customer's preferred communication method and ensure we communicate clearly through this channel.
- 7.2 We will use reasonable adjustments to ensure residents with a disability or vulnerability are not disadvantaged when accessing our services.
- 7.3 Reasonable adjustments will be determined by how effective it will be in preventing any disadvantage, the practicality of the adjustment and the costs of making the adjustment.
- 7.4 Reasonable adjustments will also depend on the individual customer's need and therefore there is no definitive list; however, some examples include:
 - 7.4.1 Providing information in different formats (e.g. large print).
 - 7.4.2 Arranging for translation or sign language services.
 - 7.4.3 Communication through a representative or intermediary.
 - 7.4.4 Asking the resident to tell us how they want us to resolve their complaint.
 - 7.4.5 Offering support to access services e.g. assisted waste collection.
 - 7.4.6 Delivering some services to tenants e.g. assisted gardening (grass and hedge cutting).

- 7.4.7 Allocating some repair cases as an emergency, depending on the need of the tenant.
- 7.4.8 Asking contractors to carry out works outside our normal working hours, or spread over more visits, if necessary due to a resident's health condition.

8 Digital Exclusion

- 8.1 In line with our Transformation Strategy, we are committed to providing accessible services.
- 8.2 We understand that not all our customers will want to engage with us digitally and we will always have staff available to take phone calls and can offer face to face appointments, as appropriate.
- 8.3 For our customers who want to engage with us digitally and self-serve, we will make sure our websites and forms are accessible. We also use accessibility software to run weekly checks across our website.

Appendices to be listed

- Equality and Human Rights Commission. Human Rights at Home: Guidance for Social Housing Providers (equalityhumanrights.com)
- Housing Ombudsman Service. Relationship of Equals. [Relationships of equals summary report. v3 \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)
- Housing Ombudsman Service. Attitudes, respect, and rights. [Attitudes, respect and rights \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)
- College of Policing. Introduction to vulnerability-related risk. [Introduction to vulnerability-related risk | College of Policing](https://www.collegeofpolicing.org.uk)