

Reasonable adjustments and supporting vulnerable residents policy and procedure

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Document owner: Head of Service Improvement

See also:

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This Policy will be applied in a way that will not discriminate on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It applies to all staff.

Version number	Amendment	Amended by	Date
1.0	New policy created by combining the reasonable adjustments and vulnerability policies	Annette Morrison	December 2024

1. **Our policy on reasonable adjustments and supporting vulnerable residents.**

- 1.1** At Newlon Housing Trust we are committed to providing an inclusive service that recognises and responds to the needs of all our residents. We understand that some residents may face challenges that require us to adjust how we deliver services. These challenges can be long-term, temporary, or arise unexpectedly, such as physical disabilities, mental health issues, or difficult personal circumstances like bereavement or domestic violence.
- 1.2** We aim to identify and support residents with these needs at any point in their contact with us, whether it's through a phone call, visit, or repair request. Once a need is identified, we will work with the resident to assess how best to adjust our services. Adjustments may include:
- **Communication support:** Providing information in large print, Braille, or alternative formats, or communicating via a nominated advocate or family member.
 - **Physical adjustments:** Installing adaptations in your home, such as ramps, stairlifts, or wet rooms, or providing temporary support for short-term injuries.
 - **Service adjustments:** Offering flexible rent payment plans or prioritising repairs and adaptations.
 - **Safety adjustments:** Implementing personalised safety measures, such as enhanced fire safety checks or evacuation plans.
- 1.3** We record and regularly review these adjustments to ensure they continue to meet the residents' needs as their circumstances change.

2. **Introduction**

- 2.1** We seek to understand the diverse needs of our residents, including those arising from protected characteristics, language barriers, and additional support needs; and we aim to provide fair access with equitable outcomes for all residents.
- 2.2** We are committed to ensuring that those residents with disabilities are not disadvantaged in accessing or receiving services. To achieve this, we seek to make relevant adjustments which are reasonable and achievable for Newlon. What we are able to provide may vary depending on the level of disability or vulnerability disclosed, as well as other factors such as resources.
- 2.3** Our residents will access our services in different ways and want to receive our services differently depending on their needs, expectations, and experiences. We need to ensure that we make adjustments to meet our residents' needs and where this is not possible to make clear what adjustments can be made and what cannot.
- 2.4** Broadly this falls into the following:
- Adjustments under the Equality Act.

- Requests for adjustments due to a stated vulnerability – Wherever possible this will be adhered to when this can be delivered, and the adjustment is linked directly to the vulnerability.
- Request for adjustments due to experience or a preference. Wherever possible this will be adhered to and where this is not possible or there are exceptions this will be clearly communicated to the resident.

2.5 Our approach should be empathetic and respectful and when delivering services a person's vulnerability should always be considered, particularly in terms of the impact that any service delivery or failure will have on the resident.

2.6 We aim to enable staff to understand vulnerabilities and make assessments around this, as well as creating an environment that encourages individuals to disclose relevant information.

2.7 Where the request for the adjustment is to be declined, the staff member should consider the risk associated with not providing the adjustments to the service and the likely impact this will have on the resident.

3. The Equality Act 2010

3.1 The Equality Act 2010 (the Act) provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

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

- Where there is a provision, criterion or practice which puts a resident with disabilities at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled.
- Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.

Substantial disadvantage is defined in the Equality Act 2010 as 'more than minor or trivial'.

4. Recognising vulnerabilities

4.1 We recognise that the needs of our residents may change over time and that some may require reasonable adjustments to access services effectively. Identifying these needs early allows us to provide the appropriate support and tailor our services. Vulnerabilities can be permanent, long-term, or temporary, and it is essential that staff are attentive to all types.

- **At initial letting** – in advance of the sign up, all residents are asked to complete a sign-up assessment form as well as a vulnerability form where appropriate. It is

then the responsibility of the Homes and Lettings (H and L) team to ensure that this is logged, and any service adjustments required noted.

- **At the time of accessing services** - for example, if a person requires a medical transfer or aids and adaptations, then the person processing the application should ensure that any vulnerability is logged, and any service adjustments clearly recorded.

4.2 What is vulnerability?

A vulnerable person may be physically disabled or suffering persistent and serious chronic health problems, examples include serious lung/heart and kidney disease. These definitions may apply to anyone within the household.

This also includes someone who:

- Has a mental illness such as bi-polar disorder or schizophrenia or dementia.
- Has a learning disability.
- Is old and frail; 70+ is how Newlon define this and over 65 if there are underlying health problems.
- Misuses drugs and/or alcohol.
- Is very young (16-21) - particularly if leaving care and/or without parental support.
- Exhibits challenging behaviour.
- Is experiencing domestic violence.
- Has very young children; this would be under 12 months, or with pre-school aged children with severe asthma or respiratory problems.
- Has serious health issues such as heart conditions, respiratory insufficiency, severe asthma, sickle cell; HIV/AIDS and COPD (chronic obstructive pulmonary disease).
- Has difficulty reading or speaking English well, this could be due to literacy levels or language barriers.
- Has a child/children who are autistic, and it has been evidenced what impact that this has on their living environment. A Unique Description Characteristic (UDC) should be added to flag this as it may have an impact on other aspects of service delivery such as carrying out works within that child's bedroom which will require special consideration, as autistic children often find change to their routine and environment difficult.
- Is the victim of gang violence.
- **Bereavement:** Recently bereaved residents may be emotionally vulnerable, impacting their ability to engage with services or make decisions. This could be recorded as a temporary vulnerability with a possible end date. Staff when made aware of a bereavement should consider how that person may be dealing with this and the impact it may have on their ability to manage other aspects of their life.

- **Temporary injury or incapacity:** Residents with a temporary injury or medical condition may require short-term adjustments, such as help with mobility or modified communication methods. This could be recorded as a temporary vulnerability with a possible end date.

4.3 If the resident's situation isn't listed, they may still be vulnerable, for example, if they have returned to living independently after some time in residential care.

5. Recording and managing vulnerability information

5.1 All identified vulnerabilities, whether permanent or temporary, must be recorded accurately in the following systems to ensure continuity of care.

- **Dynamics System:** To ensure consistent communication and note any special preferences or needs.
- **Rent Management System:** To accommodate any adjustments related to payment schedules, arrears management, or Breathing Space requests.
- **Building Safety Systems:** To ensure that any adaptations related to safety are in place and regularly reviewed.

5.2. Service Managers will be responsible for ensuring that operatives are aware of any service adjustments that are required to deliver services and that systems allow for this transference of information.

5.3. All findings from the assessment must be documented, including:

- Nature of the vulnerability.
- Required adjustments.
- Expiry date of adjustment where it is temporary.
- Referrals to specialist services.
- Follow-up actions where applicable.

6. Responding to vulnerability and requests for adjustments to how services are provided

6.1 The assessment process should involve:

- **Resident input:** Engage with the resident (or their advocate) to understand the nature of their vulnerability and any adjustments they believe would help. This could be via phone calls, meetings, or written communication.
- **Risk and impact evaluation:**
 - **Health and safety risks:** Assess whether the lack of an adjustment poses any health or safety risks (e.g. mobility impairments that affect fire safety).
 - **Service access:** Determine how the vulnerability impacts the resident's access to essential services.

- **Urgency of need:** Evaluate how critical and time-sensitive the adjustment is. For example, residents with severe impairments may need immediate interventions.

7. Existing residents – assessment process – roles and responsibilities

7.1 There will be occasions when a resident not previously assessed as vulnerable will require an assessment to be carried out, this will be when there are concerns about their behaviour, how they are managing their tenancy, or they have brought new information to our attention. There may be several ‘trigger’ factors which could suggest that there is an issue with vulnerability, or this could occur at various points of interaction with residents.

7.2 All staff must take responsibility for this.

7.3 Where there are safeguarding concerns the officer with the concerns should check the Safeguarding policy for guidance as to whether a Safeguarding case should be raised or a Vulnerability case and this should be passed to the Complex Case worker, within the Investigations team.

7.4 Reviewing the assessment

Vulnerability and adjustment needs may change, so regular reviews should be scheduled based on changes in circumstances, feedback from the resident.

7.5 Clear communication

Inform the resident of the agreed adjustments and the expected timelines for their implementation.

It should be noted that the Equality and Human Rights Commission offer the following guidance:

- The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the disabled person.
- The practicality of making the adjustments.
- The availability of Newlon’s resources including any external assistance and finance.
- Any disruption to services caused by making the adjustment.

The reasonableness of the adjustment will be evaluated against the resource available to provide the service. For example, the amount of extra spent needing to provide this service must be reasonable.

7.6 Appeal process

Where a resident is unhappy with the decision made relating to their request for a service adjustment, this should be reviewed by two managers not involved in the case, where they are unable to make a decision, they should seek external advice from equalities expert.

8. Keeping data up to date

All staff have a responsibility to ensure that the information we hold on residents is up to date. We rely on residents to inform Newlon of any change in circumstances.

When a person's vulnerability is complex and there is insufficient expertise within the organisation to make a decision on what reasonable adjustments would be then we will seek expertise from an equalities expert.

We will publish our policy on the website and promote this in newsletters and also on the website.