



# Vulnerability and Reasonable Adjustments Procedure 2026

## Provision of Services

The Council's Housing Services will embed within its working practice, the need for a consideration of vulnerable customers' needs, abilities and circumstances in the delivery of its services. This is to ensure that they receive the required support, advice or assistance to sustain their tenancy and live well.

As part of our routine delivery service, the Council's Housing Services team already provide a significant level of support for vulnerable and disabled customers. Where a vulnerable or disabled customer has been identified, they can be assessed for further advice and support, and, if appropriate, may be referred to the Housing's Tenancy Services Teams, Community Safety Hub, Housing Property Services, Adult and Children Social Care Teams and the Occupational Therapy.

Each service area will consider what additional support, or variation in usual service provision is appropriate for vulnerable and disabled customers. This may vary from service to service, but some examples include:

- Allowing longer for customers to answer their door when we call for an appointment.
- Arranging a joint visit with a carer/support worker/advocate.
- Offering visits in-person where we would normally provide a phone service.
- Explaining a letter over the phone in addition to sending it or making referrals for additional support.

## Recording and Review of Vulnerability Information and reasonable adjustments

The Council will record on a customer's account, or application notes in the case of a housing applicant, any known vulnerability or disability on the part of the tenant or other household member, including any communication or access needs.

The notes will record whether there is anyone with delegated authority or an approved advocate to speak to the council on the customers' behalf, such as a care/ support worker or family member/friend. This will ensure our teams will have advanced knowledge of any additional factors to consider when delivering services. The processing of all data recorded will be in accordance with the Council's data protection policy and all relevant data protection legislation and regulations.

The Council will proactively check, through planned calls, tenancy audits and any housing related interaction with customers that have the appropriate support flags/alerts and communication preferences recorded on our systems, and where information is missing or requires updating, that this will be actioned.

All data will be reviewed regularly to ensure it remains relevant and current and that the information is not retained any longer than necessary. Customers will be informed about the

## **Communication Needs**

Customers will be asked about any communication needs when attending the tenancy sign-up and at other opportunities during their tenancy. Where required, the council will make documents available in other languages and formats such as large print and audio. All information regarding building and fire safety is provided to customers in their first language and/or required format.

## **Customers Lacking Capacity**

In line with the Mental Capacity Act 2005, the Council will liaise with those who have legal authority to act on behalf of the customer or other who lacks capacity. That may be a representative who has or is, a/an:

- Lasting Power of Attorney (LPA).
- Deputyship Order from the Court of Protection.
- Litigation friend appointed in Court proceedings if the customer lacks capacity to litigate.
- Appointee of the Department of Works and Pensions to manage a person's benefits if they lack capacity.
- Independent Mental Capacity Advocate (IMCA) commissioned by the Council or other local authority and who are appointed where a person aged 16 or over lacks ability to act or to decide for themselves where to live and has no-one, such as a friend, relative, attorney or deputy to advise or support them.

## **Customer Profile - Vulnerability Procedure Document**

This procedure is to ensure we tailor our services and respond effectively to the individual needs of the customer.

## **Tenancy Services**

### **Lettings**

When allocating a council home, the Council will review any information received on vulnerability to help ensure any offer of housing is right for the individual and their family, known as 'Right First Time' lettings as a commitment to longer-term tenancy sustainment. Supporting information may be requested from an appropriate medical professional or other support agency before giving any additional priority due to vulnerability, this will be in line with the Allocations Policy.

Where a customer has an identified vulnerability and it is determined they may have a higher risk of not being able to sustain their tenancy without support, a tenancy sustainability plan will be developed in partnership with the incoming customer, and any support services will be offered where applicable. This will ensure there is appropriate support in place from the start of the tenancy to enable the customer to manage their tenancy and live well.

### **Mutual Exchanges**

Vulnerable customers who are registered for a mutual exchange and are unable to access the Home Swapper / Swap Tracker website due to their vulnerability e.g. elderly people without access to a computer/smartphone, will be helped.

### **New Tenancy Visits, Tenancy Audits and Proactive Calls.**

Every new customer will have a new tenancy visit within six weeks of their tenancy commencing, and at least one further visit within twelve months. Tenancy audits are also carried out regarding existing customers; the frequency of the audit is determined by the property type.

The new tenancy visits and tenancy audit process provide customers with the opportunity to tell the Council about any care and support needs they may have, or the needs of any

vulnerable household members and any care and support services received or required. Where appropriate, referrals will be made to Staffordshire County Council Social Care teams or external support agencies for further advice and support, in addition to the ongoing Tenancy Sustainment support provided by the customer's housing officer.

The Council, via its Housing Services, also offers a grass cutting service, a vulnerable decorating scheme and support of tenants who want to live independently, the latter is via telecare service.

### **Tenancy Sustainment Support**

If a customer is identified as vulnerable or in need of extra support to maintain their tenancy, will be offered housing related support. This offer of support will include helping the customer address any potential tenancy breaches and advocating on their behalf to resolve housing-related issues. For example, the officer could help with repair requests, support with rehousing if the customer needs to move, and referrals to the Income Team for help with income maximisation and budgeting. If a customer requires more specialist support, the housing officer can refer the customer to more appropriate support providers such as the relevant social care team.

### **Rent Arrears**

All customers must pay their rent on time and in advance. The Council will offer advice and support to customers who may be struggling to make their payments. Customers who approach the Council for help, or who fall into arrears, can be referred to our Income Team and other external money advice services who can help to maximise their income, provide support in managing budgets, and to set a realistic plan to repay their rent and arrears.

In addition, the Council offers a wide range of payment methods to ensure that there is a suitable method of payment for any customer, including those who may be vulnerable.

Before commencing legal proceedings due to rent arrears, the Council will ensure that a customer's vulnerabilities are considered in line with the public sector equality duty to make sure that its actions are fair, reasonable and proportionate. Being in arrears or in receipt of a low/no income is not in itself regarded as a vulnerability for the purposes of this policy.

### **Anti-Social Behaviour**

The Council recognises that anti-social behaviour (ASB) may be directed towards a vulnerable individual or household because of prejudices held by a perpetrator. It is acknowledged that in some instances vulnerable customers may be reluctant to report ASB to the Council and may be less able to cope with what may traditionally be regarded as low-level anti-social behaviour.

As such, a victim-centred approach is taken for all reports of ASB and a victim vulnerability risk assessment is carried out in all cases. This tool helps to measure any additional risks to vulnerable victims. It is recognised that perpetrators as well as victims of ASB can be vulnerable adults, too. Therefore, before commencing legal proceedings, we will ensure that proportionality assessments are carried out in line with the public sector equality duty to make sure that our actions are fair, reasonable and proportionate.

### **Repairs**

The Housing Maintenance Team within its repair's delivery service recognise that our customers have different needs and that in some circumstances customers may require additional assistance. The Council is committed to ensuring the repairs service is accessible by all and where required we may adjust response times and increase our service offering on a case-by-case basis.

If customers requires additional assistance every attempt will be made to identify any individual circumstances at first point of contact to ensure all operatives and staff are aware when visiting residents' homes, and where necessary make reasonable adjustments to carry out the repair.

The Council is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults and expects all staff and contractors to share this commitment. Where safeguarding concerns are identified, staff will follow the Safeguarding Children and Vulnerable Adults Policy & Procedure. The onsite staff will fill out a 'concern card' and share this with the line manager at the most opportune time. This is then processed through the Tenancy Service Team.

The Council will engage with, and fully contribute to, multi-agency working in response to safeguarding concerns. This includes responding to requests for information from the local authority, Safeguarding Adult Boards, Safeguarding Children Boards, Child Protection Conferences and Serious Case Reviews, Domestic Homicide Reviews wherever appropriate.

### **Damp and Mould**

- Record customer details, including known vulnerabilities of any occupiers (e.g., age, health conditions, pregnancy) from existing records or tenant correspondence, ensuring compliance with UK GDPR and Data Protection Act 2018
- Acknowledge the report to the tenant within 24 hours at the latest via preferred communication method (e.g., email, letter, SMS), confirming receipt and next steps.
- Ensure staff and contractors are trained to recognise and escalate potential hazards, even if reported indirectly (e.g., via a council officer)
- Avoid assumptions about 'lifestyle' causes for damp and mould; all reports are investigated.
- Process:
  - A competent member of the team will review the initial investigation report, tenant circumstances and all available evidence (e.g., photos, videos, maintenance records, any reports from third parties – e.g., GP, medical expert, social worker)
  - Use a risk matrix to assess:
    - ♣ Severity: extent and location of the hazard (e.g., mould in bedrooms, widespread condensation)
    - ♣ Customer vulnerabilities: age, health conditions (e.g., asthma, pregnancy), or time spent indoors
    - ♣ Dwelling factors: property age, insulation, ventilation issues.
- Complexity considerations:
  - Consider any medical evidence or reports of symptoms
  - If customer vulnerabilities (e.g., pregnancy, young children) indicate heightened risk, prioritise immediate action.

### **Community Safety**

Some customers may act in an anti-social way due to behaviours related to a vulnerability. We try to engage with perpetrators responsible for anti-social behaviour before taking any tenancy enforcement action or civil enforcement action in conjunction with other departments or external agencies.

We aim to investigate all reports of anti-social behaviour, criminal or otherwise, and where these include domestic abuse, hate crimes or harassment we will work closely with the police to support residents who are victimised or taken advantage of due to a protected characteristic or vulnerability.

We balance the safety and wellbeing of neighbouring residents alongside the wellbeing of vulnerable victims, and perpetrators before deciding the best course of action for community safety.

### **Case Reviews**

Where there are complex cases, concerning behaviours or indications of vulnerability, internal case reviews are held which provide a cross-department approach to supporting customers.

Where needed The Council will attend multi-agency risk management meetings relating to safeguarding concerns, multi-agency risk assessment conferences (MARAC) where domestic abuse is involved and multi-agency public protection arrangement (MAPPA) meetings where violent or sexual offenders are housed in our homes.

[The Council review lessons learned and actions from complaints and Housing Ombudsman cases.](#)

### **Housing Property Services**

The Housing Property Services Team acknowledge that our customers have different needs and that in some circumstances customers may require additional assistance when we provide building safety checks and upgrades within their homes. The Council is committed to ensuring the building safety function and upgrades service are accessible by all and where required we will increase our service offering as and when required.

When customers are contacted for upgrade works, property adaptations, to carry out building safety checks and risk assessments we will ensure that we are aware of any recorded additional requirements and establish any unrecorded requirements at first point of contact to ensure reasonable adjustments are in place before the visiting the property to carry the actions out

Where a property has a gas supply an annual gas safety check must take place. Where required and notified joint visits and liaison with social worker or family members, to ensure the safety of the resident, is maintained. Contractors and staff are advised through alerts from our system or will look to update records and inform the neighbourhoods team as required. Checks are also required for other works, such as fire doors, maintaining fire compartmentation, fire alarms, water hygiene, to assess lifting equipment, for electrical work and safety checks on electrical systems and to assess where asbestos is present.

When accessing a property or booking in for checks or work to be undertaken our staff and contractors are made aware that vulnerable people live in our properties and consider and make reasonable adjustments on a case-by-case basis when vulnerabilities are identified or where we are made aware of them.

### **Housing Services**

#### **Complaints -**

As a member of the Housing Ombudsman scheme, the Council will adhere to the [Complaint Handling Code](#). The headline requirement being, Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. Therefore, we'll consider and make reasonable adjustments on a case-by-case basis.

As per the Council's complaint procedure, in respect of unreasonably persistent and/or vexatious complaints and unreasonable behaviour:

Handling such complaints can place strain on time and resources and can be stressful for staff dealing with these complex and challenging issues. In order to counter this, we will decide how to manage

direct communication with the customer if matters are repeatedly raised or widely escalated. We may decide to limit or cease further contact with customers if we consider they are behaving unreasonably by making persistent or vexatious complaints. We may also redirect email or other correspondence received to a single point of contact.

Unreasonable and unreasonably persistent complainants are those who, because of the nature or frequency of their contacts with an organisation, hinder the organisation's consideration of their, or other people's, complaints.

The Council will not tolerate rude, offensive, abusive, threatening or intimidating behaviours towards its staff or Councillors and will act where appropriate to report such behaviours to the Police and may restrict or prohibit access to Council premises or staff where necessary to protect Council staff, Councillors or other people using Council premises.

### Resident Engagement

The Housing Services Team acknowledge that our residents have different needs and that in some circumstances residents may require additional assistance when wanting to engage with the Service. The Housing Service will adhere to the [Transparency, Influence and Accountability Standard](#) to ensure that tenants can access services, raise complaints, influence decision making and hold their landlord to account. In respect of this function through the Housing Services' Resident Engagement Strategy and framework of engagement opportunities.

### Service Improvement

As above, the Housing Service will adhere to the Transparency, Influence and Accountability Standard to ensure that tenants can access services, raise complaints, influence decision making and hold their landlord to account, through the provision of accessible information about the landlord's services and performance information to hold the Council to account. Information will be presented and published in an accessible format and also made available in alternative formats on request, such as large print, braille, audio, easy read and translated into other languages.

**A Vulnerability Profile Referral Form** shall be completed by the referring officer, taking into account the Vulnerability Policy and the criteria set below and any recommendations with regards to specific service requirements. This is to profile the types of vulnerability on The Housing Management System.

CODE	PROFILE	CRITERIA RECOMMENDATIONS TO BE CONSIDERED WHEN CONTACTING AND RESPONDING TO A CUSTOMER
<b>DIS</b>	<b>Disability</b>	
	Physical Impairment Sensory Impairment Hearing Impairment Wheelchair User Chronic Poor Health Serious ill Health	Check if a BSL interpreter is required Check whether tenant has requested contact via an advocate. Make contact with Social Services where support is required Check OT recommendations if appropriate, consider reasonable adjustments/adaptions required. Liaise with Housing Maintenance/ Property Services When repairs are being carried out at the property, keep access clear and unobstructed
<b>LIT</b>	<b>Literacy</b>	Assistance may be required for reading letters / completing forms Service Information in pictorial format Contact methods and communication methods to be considered carefully
	<b>Visual Impairment</b>	Check if tenant would require information in large print/pictorial/different colours Check whether tenant has requested contact via an advocate. Liaise with Housing Maintenance/Property Services

		When repairs are being carried out at the property, keep access clear and unobstructed.
<b>LAN</b>	<b>Speech Impairment Language is not English</b>	Check if tenant has a preferred method of communication Check if interpreter required – Use of Language line. Check if contact made via advocate.
<b>MHN</b>	<b>Mental Health Concerns</b>	All visits/ contacts should be managed sensitively Check whether contact is to be made via advocate, Check if Tenancy Sustainment Case open -Referral for Tenancy Sustainment if appropriate Referral to Mental Health Support Worker re Housing Support
<b>VUL</b>	<b>Vulnerability Concerns</b>	Difficulty understanding and or making decisions relating to a tenancy. Behavioural, lack of understanding. Learning Difficulties -Consider making referral to the Learning disabilities team, Social Services Contact methods via advocate Check if Tenancy Sustainment Case open? -Referral to Tenancy Sustainment if appropriate.
<b>VTM</b>	<b>Safeguarding Concerns</b>	Consider communication and sensitively (Male or Female Visits). Corporate Safeguarding Referral for Vulnerable Adult or Child at risk Victim of ASB/Hate Crime/Domestic Violence Property Security measures - Safe as Houses, Safer community security grant Communication methods via advocate Is there a Support worker ? Victim Support/Womens Aid/New Era TSO case open? Referral to Tenancy Sustainment officer may be required.
<b>YP</b>	<b>Young Person Leaving Care</b>	Visits or any contact with tenant to be managed sensitively Contact methods to be considered – via advocate Check Tenancy Sustainment case open ?- Referral TS may be required for a period of time Make contact with Social Services/Personal Advisor
<b>EXO</b>	<b>Ex-offender</b>	Check Tenancy Sustainment case open? – Referral to TS may be required. Make contact with relevant agencies where necessary, depending on circumstances both internally and externally, Probation, Support Worker etc.
<b>FIN</b>	<b>Financial Hardship Severe / multiple debt problems</b>	Check Tenancy Sustainment case open? Pre/post- tenancy Sustainment may be required. Liaise with Income Team and Housing Benefits Affordability, Pre-tenancy. Citizens Advice to establish a budget plan for multiple debts (one of the debts may be current rent arrears). Sensitive approach. Consider contact methods via advocate.