

Housing Services

Vulnerability & Reasonable Adjustment Policy 2025 - 2028

Version Control

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Contents

1. Introduction	3
2. Aim of this Policy.....	3
3. Legal	4
3.1 Legal Duties and Regulatory Requirements.....	4
3.2 Links to other related policies and documents	4
3.3 Customer information	5
4. Definition	5
4.2 Defining 'Reasonable Adjustment'	6
5. Objectives of this Policy	7
The 7 Rs	8
6. Recognised the need for tailored services.	8
7. Responding to customers in need of tailored services	8
8. Reasonable Adjustments	8
9. Review.....	9
10. Relationship.....	10
11. Relevant Training and Awareness	10
12. Reply Complaints / comments and compliments	10
13. Monitoring Performance and Service Delivery.	10
Appendix	12

1. Introduction

Cannock Chase Council Housing Services manages approximately 5,000 council homes. Our aim is to contribute towards maintaining balanced and sustainable communities and we will work towards providing services that are able to respond effectively to the needs of customers.

Tailoring our services to meet the needs of individuals is important, in terms of the many issues faced by those most in need of a particular service. Tailoring our services can have the benefit to our tenants, the Council and the wider community.

In addition, providing tailored services to meet the individual needs of our customers will allow people to prosper and enjoy a good quality of life and live as independently as possible. It is the responsibility of Cannock Chase Council to respond to issues that could affect the physical and/or mental health and general well-being of individuals and their immediate household members.

Needing tailored services does not mitigate a tenant from their responsibility to abide by their tenancy conditions but it is accepted that some tenants will require assistance in meeting this responsibility. This Policy aims to outline how in association with our key Partners we can tailor our Services to assist those customers most in need.

This policy ensures the council, as landlord, complies with the Social Housing Regulator's Consumer Standards under Transparency, Influence and Accountability by ensuring that all customers:

- Have access to good quality and safe accommodation.
- Have choice and protection.
- Can hold the council as their landlord to account.

The policy will ensure that the council provides a consistent and fair approach to providing additional support and it will endeavour to respond flexibly to customers who are facing exceptional circumstances that may make them more vulnerable.

2. Aim of this Policy

The aim of this policy is to outline how to identify and support new and / or existing customers who are, or who may become vulnerable and thus require a tailored service whilst in their tenancy.

As part of our Housing Services Policy, we will provide help and advice to customers at the Pre-tenancy stage and through the life of the tenancy. Our aim is to tailor services for any individual household who may have trouble with meeting the obligations of their tenancy conditions, as well as helping and advice with signposting people to a range of Services.

Our aim is to alleviate poverty, prevent homelessness, keep families together, support the vulnerable in the local community, assist people who are suffering financial hardship and provide the appropriate help and advice.

This policy does not aim to explain how we will approach every circumstance where a customer with disabilities or a vulnerability requires a service to be adjusted. Rather, it is a statement of our commitment to ensure customers with vulnerabilities, disabilities or additional needs are not at a disadvantage when accessing our services.

This policy defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made.

3. Legal

3.1 Legal Duties and Regulatory Requirements

This policy complies with the legal and regulatory requirements, including but not limited to:

- Care Act 2014
- Data Protection Act 2018 and the UK GDPR
- Equality Act 2010
- Equality and Human Rights Commission
- Housing Ombudsman Complaints Handling Code 2020
- Social Housing (Regulation) Act 2023
- Public Sector Equality Duty (PSED)
- Regulator for Social Housing Consumer Standards
- Accessible Information Standard
- The Disability Discrimination Act 1995 (as amended)
- Mental Capacity Act 2005

3.2 Links to other related policies and documents

This policy forms part of a wider policy framework relating to the operation of Housing Revenue Account Services and should be considered with the following key policies and documents:

- Tenancy Services Policy
- Estate Management Policy.
- Building Safety Policy

- Allocations Policy.
- Anti-Social Behaviour Policy.
- Adaptions Policy.
- Tenancy Audit.
- Tenancy Agreement
- Welcome pack
- Personal Fire Risk Assessment.
- Repairs and Maintenance
- Data Protection Policy
- Repairs and Maintenance Policy
- Hoarding Procedure

3.3 Customer information

- <https://www.housing-ombudsman.org.uk/wp-content/uploads/2024/03/Understand-your-rights-as-a-resident.pdf>

4. Definition

4.1 Defining Vulnerability

In the 2022/23 financial year, over half (56%) of households in the social rented sector included at least one person with a long-term illness or disability. The largest disparities relate to homeownership and social renting. Just over half (53.3%) of non-disabled people owned their own home, compared with 39.7% of disabled people. By contrast, a quarter (24.9%) of disabled people rented social housing, compared with 7.9% of non-disabled people.¹ Cannock Chase Council Housing Services already has a large volume of Bungalows and adapted properties and will start to conduct surveys to understand the profile of its residents and its housing stock.

Cannock Chase Council does not assume that whole groups of people need tailored services or does not rely solely on the legal definition of who is seen as 'vulnerable' although this definition must be applied when referring to issues around Safeguarding Children and Vulnerable Adults.

The welfare of children and vulnerable adults is also our primary concern. It is also our responsibility as employees to report any concerns we have to the appropriate authority and follow the Corporate Safeguarding Policy.

For this policy, we will look to provide support and tailor services for any individual or household who may have trouble with meeting the obligations of their tenancy conditions as well as helping and advice.

Being 'in need' in terms of service provision may be due to a single problem a physical or mental health condition, but equally it can be more fluid, and or less permanent. Vulnerability can be a dynamic or changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc.

Whilst some of the factors are constant, some may be a life event, such as bereavement or domestic violence, which may not necessarily remain a permanent state. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy.

The vulnerability procedure is used to profile vulnerability to identify with an individual who may need additional help, support and advice. We will consider each individual case to ensure that the appropriate contact is made and the type and level of service is provided.

4.2 Defining 'Reasonable Adjustment'

Under the Equality Act 2010, the council has a legal duty to make 'Reasonable Adjustments' in the following three circumstances:

- If there is a policy, practice or procedure which disadvantages a disabled person significantly more than a person who is not disabled.
- If a physical feature disadvantages a disabled person significantly more than a person who is not disabled.
- If a disabled person without any aids, adaptations or support service would be disadvantaged significantly more than a person who is not disabled.

Reasonable adjustments may be short term or longer, depending on the needs of the customer.

A reasonable adjustment could include a physical alteration to one of our council homes, for example, fitting a lift, providing wider doors or installing an access ramp.

It could include how we communicate with our customers in order to meet their specific needs. For example, providing information in alternative formats such as through a sign-language interpreter.

It may also be a flexible change to one of our policies, procedures or services.

The council recognises that it is not sufficient to merely meet the legal requirements, and we will endeavour to provide a person-centred approach of service provision. In all circumstances, and in line with the council's policies, the reasonable adjustment will be made to ensure all of our services can be equally accessed by customers with disabilities and other vulnerabilities, as well as those who do not.

When considering whether an adjustment is 'reasonable' or not, the council follows the guidance from the Equality and Human Rights Commission:

- How effective the adjustment(s) will be in assisting a customer with a disability or vulnerability in preventing or reducing the possibility of them being at a disadvantage.
- The practicality of the council making the adjustment(s);
- Availability of resources.
- Any disruption to the service that making the adjustment(s) may cause.

In addition, the council will also consider the future use of the resource and the benefit and impact to the community.

Where a reasonable adjustment cannot be made due to cost or resources, the housing service team will work with the customer to find the most appropriate alternative solution.

5. Objectives of this Policy

The specific objectives of this policy are as follows:

- To ensure that the provision of service to tenants in need of support remains a priority and is embedded at all levels within our Housing Service.
- To develop operational procedures with supporting data management to maintain accurate records in order to enhance current working practices.
- To develop robust referral processes both internally and with external partners to ensure that early help and intervention is in place to target the required support.
- To collect and improve the use of customer profiling information in order to respond more effectively to customers in need of assistance.
- To develop a better understanding of the number of tenants 'most in need' according to the vulnerability indicators adopted.
- To understand the type and level of contact provided to target resources more appropriately.
- To work with customers most in need and to reduce the risk of them not meeting their obligations in relation to the terms and conditions of their Tenancy Agreement.
- Outlines what is meant by a 'reasonable adjustment', the circumstances in which changes may be made, how residents can request an adjustment, and how the Housing Service will consider and respond to such requests

The 7 Rs

6. Recognised the need for tailored services.

Customers in need of help and advice can be identified at the Pre-tenancy stage, at the assisted viewing, and when signing up for a new tenancy. These needs can also be identified for existing tenants when Housing Officers are dealing with tenancy related issues. Regular contact methods are in place, and a number of tenancy audit visits are carried out to identify specific housing related issues, breaches of tenancy and any assistance required.

To enable us to do this, we have introduced a Vulnerability Procedure to identify the specific needs of each individual customer. The information will be recorded, measured and monitored in terms of the customer contact requirements and with regards to the level of help and advice needed.

7. Responding to customers in need of tailored services

The Tenancy Sustainment Team provides customers with help and advice at the start and throughout their tenancy, depending upon the circumstances. Our aim is to deliver sustainability outcomes, and the service is provided at a local level in collaboration with internal and external partners.

A case management procedure is in place, depending on the individual needs of the customer or the household requirements. This enables the Officer to assess, score and evaluate each case as Low, Medium or High Priority. This is to determine the frequency of contact required to ensure that the appropriate help and advice is in place to assist the customer to manage and sustain their tenancy.

For some people, especially those with specific physical or poor mental health issues, welfare issues or those facing more complex family situations. We recognise the need to signpost and that specific referrals are necessary to external Partners for them to provide the appropriate level of support required. In these instances, there will be a need for key Partner Agencies to take the lead. We aim to work in partnership with our Partners to achieve the best outcome for our customers.

8. Reasonable Adjustments

Reasonable adjustments are changes that Council Housing Services can make to its policies, processes, communication methods, or physical environments to ensure that individuals with disabilities and/or vulnerabilities are not placed at a disadvantage when accessing housing services. While primarily intended to support those with disabilities, such adjustments may also benefit others, depending on individual circumstances.

This policy does not attempt to detail every situation where an adjustment might be required. Adjustments are only required where it is reasonable to make them. Determining what is reasonable will depend on several factors, including:

- the nature of the individual's disability or vulnerability.
- the practicality of implementing the adjustment.
- whether the proposed change would effectively address the disadvantage experienced
- the size and capacity of another organisation to implement the change.
- the availability of resources.
- the cost involved in making the adjustment.
- whether any previous adjustments have already been made
- the longevity of the change
- the impact on others

**This list is not exhaustive, and a balance approach of reasonableness, proportionality and justification will be considered in each case*.*

The council will routinely ask if reasonable adjustments are required when individuals access its services. However, individuals are also encouraged to contact the council at any time to request an adjustment. The council will make every effort to accommodate requests and will suggest additional adjustments where appropriate. The council may also recommend adjustments that the individual may not have thought of, to ensure that their needs are fully met. In some cases, people will not know what adjustments they require or what can be provided, and in these circumstances, we can discuss a range of possible options to meet the individual needs. Also, in some cases customers will be put on a list and asked to wait until resources become available or suitable e.g. stock and assets can be located.

9. Review

We will review the vulnerability and reasonable adjustment looking to conduct robust reviews of their policies and procedures for identifying, recording and responding to tenants and customers with a vulnerability, including their safeguarding policies.

This will include consultation with those delivering services and those receiving them as well as looking for good practice from social housing and other sectors.

10. Relationship

We will have strong Partnerships with other statutory agencies such as the police and social services, with the utility companies, with other landlords and with voluntary and local community organisations.

These partners can contribute to identifying individuals with vulnerabilities as well as contributing to responding to the needs of these individuals.

Safeguarding concerns will be raised with the relevant social care team in line with the council's Safeguarding Policy, which sets out how we identify and support vulnerable adults and children at risk.

11. Relevant Training and Awareness.

All relevant housing staff will receive the appropriate training to enable them to carry out their responsibilities, as outlined in this policy and the procedure.

12. Reply Complaints / comments and compliments

The Council actively encourages all customer feedback about its services, and uses complaints, comments and compliments to review and improve our services. The tenants' newsletters, and also the Council website, with its section 'You Said, We Did (and What this means for tenants)' informs customers of its changes as a result of customer feedback.

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the council, its own staff or those acting on its behalf, affecting an individual customer or group of customers. Also, customers can ask for information held on the Housing Management System to be amended or changed.

13. Monitoring Performance and Service Delivery.

The Vulnerability Policy will be reviewed in line with any Legislative and Corporate Policy changes.

Our success in achieving our objectives in line with this Policy will be measured in several ways:

- Analysis of the number of tenants 'in need' at the Pre-Tenancy stage through the number of Tenancy Sustainment referral outcomes identified in our performance.

- The number of tenancy audits, tenancy visits and proactive calls completed annually and how many identified a new vulnerability or safeguarding requirement.
- Number of concern cards completed by Maintenance Team, Property Services and Contractors
- A reduction in the number of evictions or otherwise failed or failing tenancies involving a vulnerable person or household.
- An increase in the customer profiling data held.
- The number of customers with a recorded vulnerability or a protected characteristic.
- Reduction in tenancy breaches and abandoned properties.
- Number of successful matching of applicants with adapted properties
- Customer Satisfaction Surveys and Compliments received.

We will provide annual performance reports identifying the number of tenants who require a tailored service by the range of vulnerability indicators in place.

Appendix

Factors defining vulnerability - Below are some common factors which may help when considering the need for a reasonable adjustment.

Factor 1: Underlying characteristics - people in these groups may not require adjustments or additional support just because of the characteristic:

- Frail older people (particularly those over 75 years or older)
- 16–21-year-olds
- Those with a physical or sensory disability or impairment
- Care Leavers
- Younger Lone Parents (under 21 years)
- Refugee or asylum seekers
- Carers
- Families with disabled children
- Those living with a terminal illness

Factor 2: Ability to act, engage and cope - people may lack ability due to one or more of these factors:

- Learning disability
- Mental Illness
- Autism Spectrum Disorder
- Permanently impaired mobility or frailness
- Chronic, debilitating health conditions
- Addiction / serious substance or alcohol abuse
- Low level of literacy or low / no English language skills
- Age related conditions that impact on independent living
- Lack of capacity to make decisions (under the Mental Capacity Act 2005)

Factor 3: Exceptional life event - people may not have factors 1 or 2 but may have recently experienced an exceptional or traumatic event, leading to a situation where they may need a reasonable adjustment for a period:

- **Recent history of homelessness or living in a refuge or hostel**
- **Recently moved from supported housing to independent living**
- **Bereavement following the death of a partner, child or close relationship**
- **Recently left care as a young person**
- **Experienced sexual, racial abuse or serious harassment or hate crime**
Recent experience of domestic violence
- **Recent discharge from hospital**
- **Periods of sustained physical or mental illness at home**
- **Multiple debts and unable to meet basic needs e.g. fuel or food poverty**
- **Pregnancy**
- **Families with excluded children**
- **Ex-service personnel returning from conflict**