

1. Background and objectives

- 1.1. At Alliance Homes we know that some customers experience vulnerability and may, temporarily or permanently, need support or adjustments made to the way we deliver our services to them to enable them to have fair access to our services. We are committed to identifying these customers to make sure our working practices and services meet their needs.
- 1.2. This policy applies to Alliance Homes residents, leaseholders, licensees, shared owners, and customers receiving support services who may not be tenants.
- 1.3. This policy explains how we will support customers and it provides guidance for colleagues and contractors on how we define vulnerability.
- 1.4. There are legal and regulatory codes which all housing providers must follow. Links to these are found in Appendix A along with other relevant legislation. Where vulnerability or protected characteristics are identified, key regulations include:
 - The Equality Act 2010
 - The Regulator for Social Housing's Transparency, Influence and Accountability Standard [2024].
 - The Housing Ombudsman's Complaints Handling Code 2024
 - Human Rights Act 1998 – Article 14.

2. Policy detail

Defining Vulnerability

- 2.1 In providing services Alliance Homes defines vulnerability as:

Individuals over 18yrs with a temporary or permanent reduction in capacity, or resilience, due to their physical / mental health or a life event that prevents them from being able to manage their tenancy without additional adjustments or support.
- 2.2 We understand that vulnerability can be changeable, affected by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence and poverty etc.

Identifying the need for reasonable adjustments

- 2.3 A customer's need for a reasonable adjustment may be identified at any time, for example when signing up for a tenancy, through a call with our contact team, via a repair operative, a support worker, any operational colleague, another professional or third-party contractor, or by a self-referral for support.
- 2.4 Signs of vulnerability which may need a different approach could include the following:
 - Falling into rent arrears or other debt
 - Issues maintaining a tenancy
 - Being a victim or perpetrator of anti-social behaviour
 - Disputes with neighbours
 - Damage to the person's home
 - Detrimental change to physical appearance and / or poor hygiene
 - Failing to respond to letters or answering the door or phone
 - Self-neglect, hoarding, or other behaviour which results in the home / garden becoming damaged, neglected or unfit for occupation

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 of time]

- 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

- 2.5 We do not assume that any group or individual needs additional support, this is decided on a person-by-person basis.

Recording

- 2.6 We will record known protected characteristics and known vulnerability factors on our housing system. Records will be reviewed during routine contact with customers to ensure that permanent vulnerability is not assumed.
- 2.7 Records will include any adjustments needed to deliver a fair service e.g. communication and /or language needs, access needs, authority to speak to another person, known risks, details of support staff involved with the customer etc.
- 2.8 Where safeguarding adults or children concerns arise, these must be reported to the relevant local authority in line with the Safeguarding Policy.

Reasonable adjustments

- 2.9 Alliance Homes acknowledges its duty under the Equality Act 2010. Whilst the Act doesn't define what a 'reasonable adjustment' is, the Human Rights Commission recommends considering the following factors:
- How effective an adjustment will be in avoiding the disadvantage the customer would otherwise experience
 - The practicality of the adjustment
 - The extent of any disruption the adjustment may cause
 - The financial and other cost of making the adjustment
 - The amount of budget or support already in place
 - The availability of financial support or other assistance
- 2.10 We may change the way we usually do things if we find a service places a customer at substantial disadvantage. Examples might include:
- Allowing more time for a customer to reply to information
 - Providing information in large print, braille or digital formats
 - Offering easy read tenancy agreements
 - Ensuring our offices don't present obstacles for disabled people [accessible ground floor meeting rooms, lift access or offer of other locations]
 - Offering translation and interpretation and language line services
 - Providing information and leaflets in other languages
 - Communicating via preferred method [email, post, webchat, portal, in-person].
- 2.11 Where adjustments are related to the structure of the home, the relevant policy e.g. adaptation policy or decant procedure will be followed. [The decant procedure explains what happens when a customer is moved to allow for repairs or adaptations to the home].

How our services will apply this policy

Alliance Contact Team [ACT]

ACT are often the first point of contact for customers who call with general enquiries or to report a repair.

- 2.12 When customers make contact, we ask if there are support needs or other issues such as health concerns for example that we need to be aware of. Calls also check whether needs have changed.
- 2.13 Agreed adjustments are recorded on the housing system e.g. allowing a customer longer to answer the door, communication needs or access needs, large print etc. Larger adjustments will be forwarded to relevant services to consider.

Lettings

- 2.14 When letting homes, customers can tell us about their needs. We review information received on vulnerability to help ensure that an offer of housing is right for the individual and their family. See Alliance Homes Lettings policy.
- 2.15 Vulnerability does not override our expectation that customers should be able to understand and meet their tenancy / contractual responsibilities, as failure to meet these expectations may result in eviction.
- 2.16 Referrals for resettlement support, or to external services help support long term tenancy sustainment.
- 2.17 Tenancy checks are carried out on new residents at 28 days which provides a further opportunity to identify additional needs.

Home Repairs

- 2.18 Residents with additional needs may find it more difficult to cope if something goes wrong in their home. When a repair is reported the contact centre check to see if there are disabilities, access arrangements or support needs that should be considered. Repairs are prioritised according to urgency and consideration of known vulnerabilities and needs. See Alliance Homes Repairs, maintenance and improvement policy.
- 2.19 Aids and adaptations may also be requested to support needs arising from protected characteristics and/or vulnerability. These may be minor such as a grabrail or more major alterations requiring a move for work to be carried out. See Alliance Homes Adaptations policy and Decant procedure.

Rent Arrears and Financial Inclusion

- 2.20 Maintaining regular rent / service charge payments are a tenancy responsibility. However, we recognise that poverty and debt and failing to make payments can be a form of vulnerability.
- 2.21 Our Income and Financial Inclusion teams operate an early debt prevention approach and they work proactively and sensitively with customers to improve their financial circumstances.
- 2.22 We will ensure we are satisfied that we have fully considered a customer's vulnerability in relation to their rent management before taking enforcement action. See Alliance Homes Rent Arrears procedure.

Community Safety

- 2.23 Some residents 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.
- 2.24 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.
- 2.25 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. See Alliance Homes Anti-social behaviour policy.

Customer Engagement

- 2.26 We support customers to have equal access and opportunity to influence and scrutinise Alliance Homes strategies, policies and services using our Customer Panel and HIVE group, and take their views in to account about how landlord services are delivered and communicate how their views have been considered.

Case Reviews

- 2.27 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.
- 2.28 Where needed we attend multi-agency risk management meetings [MARM] 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.
- 2.29 We review lessons learned and actions from complaints and housing ombudsman cases.

Support Services

- 2.30 Alliance Homes provides a range of support services. Customers can be referred [or self-refer] to the following support services:
- Carers Support service
 - Financial Inclusion team
 - Housing related support service
 - Home from Hospital service
 - Home Energy Advice team
 - Social Prescribing and Community Link Worker services
 - Tenant Wellbeing service
 - Funding from the Alliance Charitable fund
- 2.31 Where internal services can't meet customer need, we refer customers to other services e.g. adult social care, mental health.

Training and Support

- 2.32 We want all colleagues to be aware that customers may experience vulnerability. Training supports vulnerability to be recognised and responded to appropriately.
- 2.33 Associated E-learning includes Safeguarding Adults and Children, Domestic Abuse Awareness and Equality, Diversity and Inclusion.
- 2.34 Discussing vulnerability is encouraged during real conversations, work plan reviews and team meetings.

3. Monitoring, consultation, and review

- 3.1 We will monitor performance delivering the objectives of this policy by reporting equalities and vulnerability data to our leadership team. [A consumer standards project is underway to look at data collection of protected characteristics and vulnerability].
- 3.2 The Head of Housing and Community Services is responsible for the implementation and review of this policy.
- 3.3 Customers and colleagues will be involved in giving feedback on this policy, leading to amendments where appropriate.
- 3.4 This policy will be reviewed within 2 years of its approval date.
- 3.5 This policy will be signed off by the Strategic Leadership Team and the Board.
- 3.6 This policy will be published on the Alliance Homes website. A customer friendly version will be developed at the request of customers.

4. Equality and diversity

- 4.1 This policy is subject to a periodic Equality Impact Assessment (EIA).
- 4.2 The purpose of this is to consider the effect of the policy on the 'protected characteristics' to ensure that it does not unfairly impact any individual or group. The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity or other grounds set out in our Equality and Diversity Strategy and Single Equality Scheme. Remedial action will be undertaken if a detrimental effect is identified.
- 4.3 The EIA requires the policy author to consider whether it may negatively impact on a person's Human Rights.
- 4.4 This policy and other Alliance Homes publications can be provided in other formats for those with visual, literacy or language difficulties.

5. Associated policy and procedure

- Safeguarding Adults and Children policy and procedure
- Equality, Diversity & Inclusion policy
- Language Line identification card
- Anti-social behaviour policy and procedure
- Person Alerts procedure
- Customer complaints policy and complaints handling procedure
- Domestic Abuse policy and procedure
- Lettings policy
- Repairs, maintenance & improvements policy
- Decant procedure and Adaptations policy
- Debt Management Policy and Rent Arrears procedure
- Data protection policy
- Human Rights policy

6. Version control and approval dates

| Approval stage | Date completed |
|--|----------------|
| Equality Impact Assessment completed | 24 June 2024 |
| EIA reviewed by Equality & Diversity Manager | 24 June 2024 |
| SLT review / approval | 11 July 2024 |
| People and Culture Committee review | 17 July 2024 |
| Board approval | 21 August 2024 |
| Next review date | August 2026 |
| Minor Amendment Approved | 19/12/2024 |

Appendix A: Further reading - Links to regulatory and legal considerations

[Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Transparency, Influence and Accountability Standard - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[The Complaint Handling Code | Housing Ombudsman Service \(housing-ombudsman.org.uk\)](https://housing-ombudsman.org.uk)

[Pre-Action Protocol for Possession Claims by Social Landlords – Justice UK](https://www.justice.gov.uk)

[Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Legislation relating to safeguarding adults - SCIE](https://www.scie.gov.uk)

[Mental Capacity Act 2005 at a glance - SCIE](https://www.scie.gov.uk)

[The Human Rights Act | EHRC \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

Appendix B: Equality Impact Assessment

An Equalities Impact Assessment must be conducted alongside the review of an existing policy or the creation of a new one.

GUIDANCE ON COMPLETING AN EQUALITY IMPACT ASSESSMENT IS AVAILABLE [HERE](#)

1. Name the Strategy, Policy, Procedure or Function (SPPF) being assessed and name of author.

Reasonable Adjustments Policy 2024 – Alex Armstrong Community Services Manager

2. Aims of the SPPF being addresses.

- *Whose need is it designed to meet?*
- *Are there any measurable elements such as time limits or age limits?*

This policy is designed to ensure we meet the needs of Alliance Homes customers who may need additional support or adjustments due to vulnerability or protected characteristics. It is aimed at supporting colleagues and contractors to understand and implement adjustments to meet identified needs.

The is no age limitation to this policy and we acknowledge that vulnerability is not a static attribute.

3. Who has been consulted in developing the SPPF?

- *Make reference or links to consultation/evidence documents.*

This policy has been drafted by Alex Armstrong Community Services Manager.

To achieve the final policy, consultation has occurred with Head of Housing & Community Services, tenancy services manager, income team manager, community safety manager, community investment manager, leasehold manager, repairs manager and support services managers.

Customers from HIVE and the Customer Panel were consulted. They provided worthwhile feedback in relation to the target audience, plain English, overall ease of read and for a customer friendly version to be developed.

4. Does the SPPF promote equality of opportunity?

Yes – all protected characteristics and other temporary or permanent vulnerabilities of customers are included in this policy, which will strengthen our approach to tailoring services to the individual and making reasonable adjustments where needed.

5. Identify potential impact on each of the diversity “groups” by considering the following questions:

(The list is not exhaustive but an indication of the sort of questions assessors should think about):

- *Might some groups find it harder to access the service? Do some groups have particular needs that are not well met by the current SPPF? What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)? Have staff/residents raised concerns/complaints? Is there local or national research to suggest there could be a problem?*

| Protected Characteristic | No Impact | Negative Impact | Positive Impact | Information source/s* | Comments/Evidence |
|--------------------------------|-----------|-----------------|-----------------|-----------------------|---|
| Race | | | x | | This policy aims to address vulnerabilities across all protected characteristics. Progress will be monitored and reported on. An easy read version of the policy will also be produced. |
| Disability | | | x | | |
| Gender | | | x | | |
| Transgender | | | x | | |
| Sexual Orientation | | | x | | |
| Religion or Belief | | | x | | |
| Age | | | x | | |
| Marriage and Civil Partnership | | | x | | |
| Pregnancy and Maternity | | | x | | |
| Rural Issues | | | x | | |
| Social Mobility | | | x | | |

*Possible information sources for assessing impact or understanding issues related to target group, such as:

- Demographic data, studies of deprivation, statistics on health etc, Results of consultations, results of equality monitoring data, complaints, customer feedback, Information collected from partner agencies and groups, support groups, professional expertise, 'peer review', project leads/teams, inspection reports etc.

Was there a negative impact in question 5? If yes go to question 6. If not go to question 7.

6. If “negative impact” identified in table (4) above, is it?

| | | |
|-------------------------------------|------|-----|
| Legal | YES | NO |
| What is the level of impact? | HIGH | LOW |

If it is not legal and/or high impact (i.e. If you have highlighted NO to legal and HIGH to impact) **then the document should be referred to Head of HR**

7. If positive impact has been identified in table (4) above, how can it be improved upon or maximised, either in this SPPF or others?

This policy is new, and it formalises our approach to making a reasonable adjustments for customers where vulnerability is identified. We will make this policy a mandatory read for operational colleagues and deliver workshops to managers to help embed the understanding of this policy and how to apply it.

A Consumer Standards Data Collection Project is underway to prepare for the collection of essential data to help us understand our customer demographic.

8. Full EIA (or if you decide full EIA is not necessary but some changes should be considered)

- *Are there changes you could introduce which would make this SPPF work better for this group of people? Is further research or consultation required?*

| | |
|-----|----|
| YES | NO |
|-----|----|

9. Does this proposal have any human rights implications? If yes, please describe (If necessary, please refer to the Alliance Homes Human Rights Policy)

Article 14 of the Human Rights Act is an 'absolute' right, meaning there are 'no circumstances under which a person may be discriminated against'. This policy strengthens Alliance Homes approach to ensuring customers are not disadvantaged or discriminated against due to protected characteristics or vulnerability.