

## Vulnerable Residents and Reasonable Adjustments Policy

Document Owner	Operations Director
Prepared by	Policy Officer
Approved by	Directors Group
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Lines of Defence/how is the document audited?	<ol style="list-style-type: none"> <li>1. Regular performance reporting</li> <li>2. Regular reviews and reporting on data held</li> </ol>

## **1. Scope and Aims**

- 1.1. This policy sets out Hexagon Housing Association's (Hexagon's) commitment to assisting vulnerable residents and/or their household members to ensure they can access our services and receive the assistance they need to sustain their tenancy.
- 1.2. Hexagon is committed to providing fair and respectful services by listening to residents, understanding differing needs, and providing accessible and responsive services and communications.
- 1.3. The aim of this policy is to ensure:
  - 1.3.1. A consistent approach in identifying and offering support to vulnerable residents and/or their household members to maintain their tenancy.
  - 1.3.2. We offer reasonable adjustments in the delivery of our services to accommodate the needs of residents and/or their household members.
  - 1.3.3. We recognise, respond, and react to the changing needs of residents, and provide a sensitive, professional and respectful service to all residents.
- 1.4. The use of 'Hexagon' in this policy applies to all Hexagon staff, volunteers, contractors, and those working on Hexagon's behalf.
- 1.5. This policy does not address our Safeguarding, Anti-Social Behaviour, Complaints, or Adaptation processes. Please see our relevant policies for each of these areas.

## **2. Equality and Diversity**

- 2.1. Hexagon is committed to promoting equality and diversity and this policy aims to ensure that the diverse range of Hexagon residents receive equitable access to our services.
- 2.2. An equality and diversity impact assessment has been carried out and is attached as an appendix to this Policy.
- 2.3. This policy aims to meet our obligations under the Equality Act 2010, the Care Act 2014 and the Human Rights Act 1998.

## **3. Consultation**

- 3.1. Residents were consulted on this policy by email in December 2023 and their feedback has been incorporated into this policy.

## 4. Defining Vulnerability

4.1. Hexagon defines 'vulnerable' in relation to the provision of its services as:

*residents who have a particular characteristic and/or experience an exceptional life event and are currently unable to manage their tenancy, or access our services, without additional support or reasonable adjustments.*

4.2. Our definition reflects our understanding that 'vulnerability' can be a changeable state influenced by multiple factors and experiences. The more common characteristics, events and factors we take into consideration when considering a resident's state of vulnerability are set out below.

4.3. Long-term factors:

- 4.3.1. Physical, mental, or learning disabilities, impairments, or long-term health problems
- 4.3.2. Neurodiversity
- 4.3.3. Low level of literacy
- 4.3.4. Low or no English language skills
- 4.3.5. Households with disabled children
- 4.3.6. Households with children excluded from school
- 4.3.7. Ex-service personnel
- 4.3.8. Experiencing difficulties in caring for themselves
- 4.3.9. Lacking capacity as defined by the Mental Capacity Act 2005
- 4.3.10. Care Leavers
- 4.3.11. Refugees or Asylum Seekers
- 4.3.12. Experiencing substance dependency or addiction
- 4.3.13. Terminal illness

4.4. Short-term factors:

- 4.4.1. Moving from supported accommodation
- 4.4.2. An ex-offender and recently released from prison

4.4.3. An ex-rough sleeper or recently left a refuge or homeless persons hostel

4.4.4. Experiencing domestic abuse, hate incidences, or harassment

4.4.5. Bereavement

4.4.6. Unemployment

4.4.7. Relationship breakdown

4.4.8. Financial exclusion, fuel or food poverty

4.4.9. Pregnancy, recently given birth, or still born or miscarried

4.4.10. Recently discharged from hospital or other institutional care

4.4.11. Debilitating illness

4.5. Some of these factors are a constant and some can be a life event such as bereavement or domestic violence that does 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, or what reasonable adjustments they require to access our services.

4.6. An individuals' ability to act, engage or cope with everyday activities varies and so is an important factor in considering vulnerability. For example many older or disabled people are very independent and active and often do not need any additional assistance to sustain their tenancy and remain independent.

## **5. Identifying and Recording Vulnerability**

5.1. Hexagon acknowledges that we do not have comprehensive information on the characteristics and potential vulnerabilities of our residents, and that individuals' circumstances change. Therefore, Hexagon commits to embedding a process of identifying vulnerability into our day-to-day service delivery. We may ask about vulnerabilities during tenancy sign-ups, home visits, tenancy reviews, and other occasions where we are communicating with residents.

5.2. Relevant staff will receive training to support them to identify vulnerabilities and to support them to propose reasonable adjustments. Hexagon will ensure that colleagues are aware of this policy and feel empowered to discuss any potential vulnerability or additional need with the customer.

5.3. We will record on the customer record any known vulnerability, any required reasonable adjustments, including any particular communication or access

needs, and whether there is anyone with delegated authority to speak to us on the residents' behalf, such as a care or support worker. This will ensure our staff will have advance knowledge of any additional factors to consider when delivering services.

5.4. Hexagon will review our records regularly to ensure the information we hold is accurate and up-to-date.

5.5. Hexagon will process data in accordance with our Data Protection Policy, Data Retention Policy, and Privacy Policy, and in line with our obligations under the Data Protection Act 2018 and UK GDPR.

## **6. Support for Vulnerable Residents**

6.1. Hexagon recognises that responding and reacting to the changing needs of residents requires a willingness to do things differently and find individual solutions to ensure equitable access to our services for all.

6.2. Hexagon will offer Housing Sustainment support for those residents requiring additional support. This will include signposting or referral to relevant support agencies.

6.3. Hexagon's Community Investment team will offer Financial Inclusion and Employment advice and support to residents, including access to work experience and training.

6.4. Hexagon will maintain a Tenant Hardship Fund.

6.5. All Hexagon staff will complete Customers at the Heart (or similar) training to ensure that communication with, and service provision to, residents aligns with Hexagon's CARE values:

6.5.1. **C**ustomers at the heart

6.5.2. **A**ppreciating difference

6.5.3. **R**esponsible and accountable

6.5.4. **E**mpowering people

6.6. This training aims to ensure that staff attitudes, belief-systems, tone and approaches are respectful, non-judgmental, empathetic, and sensitive to resident's lived experiences. Staff training will address unconscious bias, perspective, inclusivity, and taking a holistic approach to service delivery.

- 6.7. Hexagon will consider creative, person-centred and bespoke responses to the individual needs of residents to ensure they can access our services and maintain their tenancies.
- 6.8. Hexagon will take seriously any allegations of bias, prejudice or discrimination made by residents against our staff, contractors, or the organisation. This will be investigated through our Complaints process.
- 6.9. Vulnerable residents may need extra care or support during periods of Anti-Social Behaviour (ASB), either as victim or perpetrator. This will be identified through a risk-assessment process specific to the ASB and Harassment procedure.

## **7. Reasonable Adjustments**

- 7.1. To make an adjustment means to make a physical change to premises or to change work practices to avoid or correct a disadvantage to a person with a disability. Hexagon will also consider reasonable adjustments for those who do not have a disability but are otherwise vulnerable as defined by this policy.
- 7.2. Hexagon will offer adaptations as per our Adaptations Policy. Hexagon strongly believes in improving the quality of life for residents by providing aids and adaptations that meet their specific needs.
- 7.3. Hexagon will identify, record, and adhere to residents' preferred communication methods. Hexagon will adhere to our Communications Framework, including:
- 7.3.1. To provide a variety of communication methods at a reasonable frequency;
  - 7.3.2. To ensure communication is accessible; and
  - 7.3.3. To use communication methods that meet the needs of diverse groups
- 7.4. Whilst Hexagon aims to expand our digital communication offering to tenants, we understand the risk of digital exclusion and will ensure that we are always offering a range of ways to communicate that includes non-digital methods.
- 7.5. Hexagon will also adapt to residents' communication needs as per our Translation Policy.
- 7.6. While we do not define whole groups of people as vulnerable by default e.g. 'the young', 'the old' or 'single parents', we will embed in our way of working consideration of vulnerable residents' needs, abilities and circumstances in the

delivery of our services and ensure they receive the required service, advice or assistance to sustain their tenancy.

7.7. Each service area will consider what additional support, consideration or variation in usual service provision is appropriate for vulnerable residents. This may vary from service to service but some examples are:

7.7.1. Allowing longer for customers to answer their door when we visit for an appointment;

7.7.2. Allowing more time to explain repairs or installations to a resident

7.7.3. Allowing more time or breaks during meetings or telephone calls

7.7.4. Allowing more time at a viewing or for the customer to make a decision

7.7.5. Providing an induction loop or assistance from a sign language interpreter

7.7.6. Providing information or documents in appropriate alternative formats such as large print, Braille, coloured paper, or easy read language.

7.7.1. Working with representatives acting on behalf of the resident

7.7.2. Visits in person where we would normally provide a phone service

7.7.3. Explain a letter over the phone in addition to sending it

7.8. When considering what is reasonable, we will take into account:

7.8.1. The effectiveness of the adjustment(s) in preventing or reducing the disadvantage for the person with a disability

7.8.2. The practicality of us making the adjustments

7.8.3. The availability of our resources, including external assistance and finance

7.8.4. Any disruption to the service that making the adjustment may cause.

## **8. Monitoring and Compliance**

8.1. Service areas will monitor and report on their performance under this policy to ensure compliance.

8.2. Hexagon will monitor and report on the completeness of our resident data to track progress with identifying vulnerabilities across our resident base.

## 9. Legal Framework

9.1. Under the Equality Act 2010 the legal duty to make reasonable adjustments arises in three circumstances:

9.1.1. Where there is a provision, criterion or practice which puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled.

9.1.2. Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

9.1.3. 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 s.212(1) as 'more than minor or trivial'.

9.2. Hexagon has a duty under the Equality Act 2010 to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it” but as a social landlord we recognise that many other residents can be vulnerable for reasons other than the characteristics protected under the equalities legislation, and this policy sets out how we define vulnerability and how we aim to respond to those residents’ needs.

9.3. The Social Housing Regulator’s Transparency, Influence and Accountability Standard requires registered providers to “treat all tenants with fairness and respect” and requires that we “must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants”. The Standard requires Hexagon to use relevant information and data to:

9.3.1. understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and

9.3.2. assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.

9.4. The Housing Ombudsman Complaints Handling Code 2024 states that:

“Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has



disclosed. Any agreed reasonable adjustments must be kept under active review.”

## 10. Related Hexagon policies

10.1. Safeguarding Policy

10.2. Adaptations Policy

10.3. Anti-social Behaviour Policy

10.4. Complaints Policy

10.5. Housing Sustainment Procedure

10.6. Hardship Fund Procedure

10.7. Translation Policy

10.8. Domestic Abuse (and Violence Against Women and Girls) Policy

## Appendix 1: Equality Impact Assessment

### Part one: Initial Screening

<b>Name of policy, service or function</b>	<b>Vulnerable Residents and Reasonable Adjustments Policy</b>
<b>Persons completing Initial screening</b>	<b>Policy Officer</b>

#### Resident Involvement

<b>Method</b>	<b>Data</b>
Email consultation	A resident raised the question of why our Equality Impact Screening does not include sections on people who have suffered from abuse, care leavers, and ex-service personnel. This assessment is intended to assess whether the Policy meets our commitments under the Equality Act 2010 and so focuses on the characteristics protected under that Act. We do, however, include socioeconomic status and literacy in addition to these characteristics, so there is scope for further additional characteristics to be included in future. We feel that in this case the impact on those raised by the resident is addressed in the Policy itself. At our next review of the Equality Impact Assessment we will consider whether to change the format to address the characteristics outlined in this policy in addition to the protected characteristics under the Equality Act 2010.

## Screening

Protected Characteristic	Is impact positive, negative, or none			Reason
	Positive	Negative	No Impact	
<b>Age</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to age.
<b>Disability</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to disability.
<b>Sex</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' sex.
<b>Gender reassignment</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' gender.
<b>Race</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' race.
<b>Religion or belief</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' religion or belief.
<b>Sexual orientation</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' sexuality.
<b>Socio-economic status</b>	X			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate to a persons' socio-economic status.

<b>Literacy</b>	<b>X</b>			This policy pays due regard to the potential vulnerabilities or requirements for reasonable adjustments that may relate literacy.
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<p><b>What are the arrangements for monitoring the policy and its impact on customers?</b></p>
<p>Service areas will monitor and report on their performance under this policy to ensure compliance.</p> <p>Hexagon will monitor and report on the completeness of our resident data to track progress with identifying vulnerabilities across our resident base.</p> <p>This Policy and this Equality Impact Assessment will be reviewed every 3 years.</p>

***As no negative impact has been identified for any group, this screening is sufficient and Hexagon will not complete part 2 of the Equality Impact Assessment.***