



# **Reasonable Adjustments and Vulnerabilities Policy**

**December 2025**

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## **1. Introduction**

- 1.1 SW9 Community Housing (SW9 CH) is committed to supporting its vulnerable residents. SW9 CH recognises that it has a responsibility to ensure that vulnerable people are able to enjoy a good quality of life and to live as independently as possible.
- 1.2 This policy sets out how we will support our residents with vulnerable needs and explains how we define, assess, and record vulnerability to meet residents' needs, when necessary. Additionally, it defines what a 'reasonable adjustment' is, in what type of circumstances we'll make them, and how residents can request them.
- 1.3 This policy applies to all residents, household members, and customers. The type of support we provide may depend on the type of tenancy or lease.
- 1.4 Where there is a risk of harm, abuse, or neglect to residents, we will follow our Safeguarding policies and procedures and/or our Domestic Abuse Policy.

## **2. Policy Statement**

- 2.1 SW9 CH acknowledges and understands that by having a disability does not necessarily mean a resident is vulnerable. Equally, not all our residents with vulnerable needs have a disability.
- 2.2 This Policy is a statement of our commitment to ensure residents with disabilities and/or vulnerable needs are not at a disadvantage when accessing our services. It does not explain how we will support or assist a resident with additional needs in every circumstance.
- 2.3 Our wider suite of policies and procedures will advise how service areas adapt to meet the needs of residents with additional needs and provide further support, where necessary. This support may be delivered by us or through referral to external agencies.
- 2.4 We are committed to being a supportive, diverse, inclusive, and equal opportunities organisation. Our colleagues receive mandatory training to embed this in all their interactions with our residents and when delivering our services.
- 2.5 We will work with support workers, advocates, family members, or other professionals with disclosure authority to meet the needs of our residents and ensure any necessary support is in place.
- 2.6 Residents, or someone on their behalf, can make a complaint through multiple channels as detailed in our Complaints Policy. We will ask residents about their needs and any reasonable adjustments they require when dealing with a complaint.

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### 3. Definition of Vulnerabilities

- 3.1 We define a resident with vulnerable needs as someone (including a member of their household) with any condition or circumstance that either:
- Places them at risk in their home.
  - Puts them at risk of being unable to comply with the conditions of their tenancy or lease without additional support or intervention.
  - Affects their ability to access our services.
- 3.2 Vulnerability may be caused by personal circumstances, timing, and/or whether there is existing support in place.
- 3.3 This is why we will assess vulnerable needs/priority on a case-by-case basis.

### 4. How vulnerability is defined

- 4.1 Residents will be asked whether they, or any household members, have any additional needs at the start of their tenancy.
- 4.2 During any type of contact colleagues may enquire about a resident's needs, and residents are encouraged to state their needs whenever possible.
- 4.3 We expect colleagues and third-party contractors to anticipate the vulnerable needs a resident may have, and that they may need support or assistance. This can be from their own observations or by using the information available to them from the resident's records.
- 4.4 The below indicators do not necessarily mean a resident has vulnerable needs however may mean they have additional needs. It is important for colleagues and third-party contractors to be aware of these, as early identification will mean the resident will receive any necessary help and support as soon as possible:
- **Health and abilities** – physical health impairment, sensory impairment, cognitive impairment, mental health issues, developmental condition, and addiction.
  - **Access and skills** – lack of language, literacy, numeracy, digital access, and technical skills.
  - **Personal circumstances** – major life events such as bereavement, redundancy, loss of income, divorce or a relationship breakdown, being the victim of domestic abuse, anti-social behaviour, or harassment.
  - **Financial** – low knowledge of financial matters or low confidence in managing money, difficulty in enduring financial or emotional shock due to debt or a one-off unexpected expense; low or unstable income.

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4.5 Other indicators of vulnerable needs and that further support or assistance could be offered to residents include:

- Anti-social behaviour as a result of mental health issues.
- A repeated failure of non-engagement with correspondence or to answering the door when visited.
- Hoarding, self-neglect, or other behaviours that could cause harm to themselves or their property, and their home and/or garden becoming unfit for occupation.
- A detrimental change in the person's physical appearance.
- Erratic and unusual patterns of rent payments and falling into arrears when the resident previously had good payment history.

## 5. Reasonable Adjustments

5.1 Under the Equality Act 2010, we have a legal duty to make adjustments in the following three circumstances:

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

5.2 A reasonable adjustment is a legal term defined by the Equality Act 2010. Its purpose is to ensure all our services can be equally accessed by residents with disabilities, as well as those without. A reasonable adjustment can be:

- **A physical alteration to one of our premises**, for example, fitting a lift, wide doors, or a ramp.
- **A change to one of our policies, procedures or services**, for example, a comfort or rest break in a meeting or an extension of time limits (where lawful to do so),
- **An adjustment to how we communicate** with our residents to meet their specific needs. For example, providing information in alternative formats.

This list is not exhaustive.

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- 5.3 We use the definition of a disability set out in the Equality Act 2010. This states a person is disabled if they have a physical or mental impairment, and the impairment has a substantial and long-term effect on their ability to carry out normal day-to-day activities.
- 5.4 Many of the adjustments to our services we offer can also be made available to our residents without disabilities.
- 5.5 Our *Aids and Adaptations Policy* sets out how we will provide adaptations to help residents continue to live independently in their home. An 'adaptation' is a physical alteration or addition to a home, designed to make it easier or safer for use by older people or people with a health condition or impairment.

## **6. How to request a reasonable adjustment**

- 6.1 A reasonable adjustment can be requested from us in the following ways:
- By the resident themselves
  - By referral from a local authority or other relevant agency
  - By a family member when we've been given permission for them to do so and/or
  - A member of staff may suggest for one to be made, when they're aware it will support the resident's needs.
- 6.2 SW9 CH will review all applications and they will be decided on a case-by-case basis at the discretion of SW9 CH. In some cases, we may seek advice from expert disability organisations that can assist with signposting and other forms of support.

## **7. What do we mean by 'reasonable'?**

- 7.1 The Equality and Human Rights Commission advises the following when deciding whether an adjustment is 'reasonable' or not:
- How effective the adjustment(s) will be in assisting a resident with a disability and in preventing or reducing the possibility of them being at a disadvantage
  - The practicality of us making the adjustment(s)
  - The cost of the adjustment(s) and whether this is possible within our resources; and
  - Any disruption to the service that making the adjustment(s) may cause.
- 7.2 Where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the resident to find the best alternative solution for

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them.

- 7.3 If you disagree with our decision, you may be able to challenge it through our Complaints Policy.

## **8. Communication**

- 8.1 We expect colleagues and third-party contractors working on our behalf to adjust how they communicate with residents to meet their additional needs, where necessary. This can include:

- Asking residents if they have a preferred method of communication.
- Using the resident's preferred method of communication.
- Allowing more time to understand information and/or make decisions (where lawful to do so).
- Providing information in alternative formats or providing a sign language interpreter at workshops and events.

- 8.2 We will support our colleagues by encouraging them to take extra time or to be flexible when responding to residents with vulnerabilities and/or additional needs.

- 8.3 We will inform residents of any support available to them to meet their needs.

## **9. Keeping record of residents' needs**

- 9.1 We will record any known vulnerability or disability on our internal systems, including any communication or access needs and whether there is anyone with delegated authority to speak to us on the resident's behalf.

- 9.2 If a resident or household member is recorded as having vulnerable needs or a disability, we will use this information wherever possible to deliver services that meet their individual needs and help them access appropriate support.

- 9.3 We will review this data periodically to ensure its accurate and up to date.

## **10. Information sharing**

- 10.1 When sharing information about residents, we will comply with our Data Protection Policy.

- 10.2 We are permitted to share information with an appropriate agency where there are overriding and serious concerns about the risk to an individual's health or

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personal safety. The law allows us to disclose information to, and request information from, relevant authorities where it works towards reducing crime and anti-social behaviour.

- 10.3 We will communicate information about a resident's vulnerable needs or disability to our contractors whenever necessary to ensure services are delivered appropriately.
- 10.4 We will respect the wishes of the resident at risk in relation to what information should be shared, and with whom, where possible.
- 10.5 Colleagues will always respect confidentiality and not share any information given in confidence unless justified by the assessed risk to the resident or required by law.

## **11. Equality and Diversity**

- 11.1 We have carried out an Equality Impact Assessment to consider the positive and negative impacts this Policy may have on people with protected characteristics under the Equality Act 2010.

## **12. Related documents**

- Safeguarding Policy
- Safeguarding Procedure
- Domestic Abuse Policy
- Aids and Adaptations Policy

## **13. Legislation and regulation**

- Equality Act 2010
- Tenant Involvement and Empowerment Standard
- Financial Conduct Authority Handbook – Principle 6.

## **14. Review**

- 14.1 This policy will be reviewed every three years, or whenever there are changes to legislation, regulation or best practice.

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<b>Policy author:</b>	<b>Policy and Performance Manager &amp; Supported Scheme Manager</b>
<b>Policy owner:</b>	<b>Head of Customer Services</b>
<b>Adopted from Network Homes: y/n</b>	<b>No</b>
<b>Review schedule (1, 2 or 3 years):</b>	<b>3 years</b>

## Change Record

<b>Date</b>	<b>Reviewed by (name and title)</b>	<b>Version</b>	<b>Summary of changes</b>
May 2025	Zoe Christodoulou & Lana Hunte	V1.0	Replaced the Vulnerable Residents Policy with Vulnerability and Reasonable Adjustments Policy

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