



PA Housing

PA Housing Vulnerable residents and reasonable adjustment policy

March 2025

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Department	Neighbourhoods
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Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats we will provide them.

1. Introduction

Paragon Asra Housing Limited (PA Housing) is committed to supporting vulnerable residents by ensuring that they are not disadvantaged when accessing housing services. It recognises that vulnerabilities can be varied, temporary, or long-term and may affect people at different stages of life. We understand that to do this effectively, we need a consistent approach, ensuring that colleagues have the information and tools to effectively provide the right support for our vulnerable residents. This includes considering in advance what residents may need when accessing the service.

This policy has been written in accordance with the Housing Ombudsman Service Complaints handling code 2024 and the Spotlight Report 'Attitudes, Rights and Respect; A Relationship of Equals' 2024.

2. Objectives

PA Housing aims to ensure that vulnerable residents receive the support they require to access our services and sustain their tenancies. The aim of this policy is to ensure that our services are easily accessible for all residents, we are providing information and communication that is appropriate to meet residents' diverse needs, and to demonstrate that we understand and can respond to the individual needs of residents. To achieve this, we will:

- Identify vulnerable residents, including members of the household.
- Record any vulnerabilities and ensure records are kept up to date.
- Take account of vulnerability when delivering services to make appropriate reasonable adjustments.
- Record any delegated authority and permission to disclose.

3. Defining Vulnerability

There is no universal definition of 'vulnerability', as this can be a changeable state influenced by a number of factors (detailed in Appendix 1).

We also recognise that a resident's ability to act and engage with everyday activities varies, and it is important to consider this when assessing vulnerability. For example, someone with a disability may not need any additional assistance.

This policy has therefore taken into account guidance from the Housing Ombudsman Service, an independent, impartial, and free service for social housing residents, and defines vulnerability as:

- **A dynamic state** which arises from a combination of a resident's personal

circumstances, characteristics, and their service request. Vulnerability may be exacerbated when a social landlord does not act with appropriate levels of care when dealing with a resident's service request. If effective reasonable adjustments have been put in place, vulnerability may be reduced.

4. Key Points of the Policy

This policy applies to PA Housing residents, including household members. Any external contractors, third parties, or subcontractors providing services based on a specification set by PA Housing are responsible for adhering to this policy.

5. Identifying Vulnerability (Recognise)

PA Housing is committed to knowing who is behind our doors. Through knowing our residents, we will effectively be able to identify vulnerabilities. At all touchpoints during a resident's tenancy, we will capture information around vulnerabilities for them or any of their household members. This includes at the start of the tenancy at the letting stage and during the tenancy through regular engagement, tenancy audits and surveys. PA Housing regularly asks residents during interactions if they or their household members have vulnerabilities.

A resident's vulnerability may be identified in a number of ways, including:

- Residents telling us about their vulnerability.
- Any PA colleague.
- Our contractors.
- An external agency, such as the local authority or a support agency.

We will also ask residents during our annual *You and Your Neighbourhood* visit to their home if they would like to share information with us, such as if their individual circumstances have changed, or to flag any vulnerability or disability.

We will utilise our data to identify customers we have not had engagement with to provide targeted support to vulnerable residents. For example, reviewing internal records (e.g., rent arrears, repair requests, lack of engagement) to identify potentially vulnerable residents and welfare checks for 'at risk' residents.

6. Addressing the Resident's Needs (Respond)

When a resident is identified as vulnerable, with the resident's permission we will:

- Record the nature of the vulnerability on our Housing Management system, and any other relevant case management, together with reasonable adjustment requirements.
- Check the system for any vulnerabilities before contacting a resident and when opening a case to ensure we act in an appropriate way with regards to the type of vulnerability. Where the resident makes contact i.e through the contact centre the call handler should check the system for vulnerabilities.
- Undertake reviews every 12 months to ensure the information we have is up to date and accurate.

7. Reasonable Adjustments

PA Housing will make every effort to make reasonable adjustments to ensure that residents are able to access all services equally and fairly.

In many cases, residents will not need to make a formal request for a reasonable adjustment, as this can be identified during interactions with PA colleagues, who will record it in the system. A colleague may recognise the need for a reasonable adjustment during various touchpoints with the resident, such as the "You and Your Neighbourhood" survey, tenancy audits, home visits, or when a resident calls the Customer Service Centre. For example, if a resident has mobility issues and requires additional time to answer the door, a colleague will ensure this is recorded and implemented. If a resident wishes to request a specific reasonable adjustment, they can do so through any form of contact with PA Housing, including face-to-face, in writing, over the phone, or by email.

Alternatively, these requests may come from

- By referral from a local authority or other relevant professional service, for example Occupational Therapy.
- A family member when we have been given permission for them to do so

PA Housing aims to 'know who lives behind the door', so we can support our residents and make reasonable adjustments where needed. When considering this, we will take into consideration the impact of the disability, condition, or circumstance to the individual, and if the adjustments would improve accessibility for the individual. There is no definitive list of reasonable adjustments that we will consider for resident, but they may include:

- Using advocates and working with support agencies
- Providing delegated authority

- Ensuring preferred communication methods are used- e.g. verbal communications, email, large print
- Arranging to fit around residents needs
- Providing interpretation or translation, including BSL.

We will contact residents using an appropriate communication method which considers any need or preference. Details of the adjustment will be updated on our Housing Management systems so that all colleagues can access and provide the adjustments required.

Whilst PA Housing will always try to meet residents' needs wherever practicable, it may not be possible or reasonable to achieve this in every circumstance. When deciding whether an adjustment is reasonable, we will consider:

- How effective will the change be?
- Can it be done?
- The cost and resources

If after taking these points into account and it is reasonable we will make the adjustment.

8. Recording

We keep the record of residents' needs on our Housing Management systems, ensuring that we meet their specific needs throughout the duration of their tenancy or home ownership. At the beginning of a resident's tenancy, they will be asked whether they have any support needs and/or communication preferences. Residents can update us on changes or additional needs at any point.

We will proactively and routinely check that we have the appropriate support flags and communication preferences recorded on our systems in line with our approach to reasonable adjustments and recording customer characteristics information and vulnerability.

9. Appeals

If a resident is dissatisfied with the decisions we have made regarding a reasonable adjustment request they have a right to appeal.

The appeal must set out in writing why the resident feels the decision is not justified in accordance with this Policy. It must be within 14 working days of

receiving notification of the restriction. A manager not involved in the original decision will review the appeal and respond within 10 working days.

10. Implementation

To achieve the objectives of this policy, we will promote identifying, responding to (including any reasonable adjustments), and recording of vulnerabilities through the following methods:

- By including a paragraph in written communications (e.g., acknowledgement letters).
- Embed our approach into service delivery by training staff so they identify vulnerable residents and their needs.
- By including a note on our published documents indicating that we can provide the document in an alternative format on request.
- By publishing our policy on our website.
- Ensure we have the necessary data fields to record specific requirements as a result circumstances and characteristics.
- Publicising on scheme noticeboards and at key stakeholder locations.
- By collaborating with key representative groups and others to raise awareness of this policy.

11. Training

All colleagues at PA Housing will be informed of this policy, and all colleagues and contractors who interact with residents will receive specific training to provide them with the skills and knowledge to implement this policy.

Front-facing colleagues will receive mandatory annual training on identifying and supporting vulnerable residents.

This policy is accessible on PA Housing's intranet and website and will be actively promoted to all employees.

12. Monitoring and Reporting

PA Housing undertakes monitoring to meet statutory requirements and achieve best practice. This is used to inform and improve our services.

All cases are recorded on the housing management IT system. Regular reviews, monitoring and reporting will be conducted as required. We will use anonymised data to report on the adjustments being offered and use this to further shape the future for service delivery.

PA Housing will monitor the number and nature of reasonable adjustments that are put in place to identify any trends in service delivery that could lead to changes being made in the service which may benefit a large number of residents. It will also report on characteristic data such as the reporting of disabilities to ensure we are capturing this information to enable us to profile our residents and deliver better services.

We will regularly review the reasonable adjustment flags on our system to ensure they are relevant, and the information is up to date. More details on this can be found in the UDC procedure.

13. Review

To ensure best practice around supporting our vulnerable residents, this policy will be reviewed yearly (from the date it is approved) by the Executive Management Team (EMT). This will ensure its continuing suitability and effectiveness.

If you have any questions about this policy, please contact:

Sally-Anne Underhill – Director of Neighbourhoods & Customer

Services

Sally-anne.underhill@pahousing.co.uk

14. Legislation

PA Housing has responsibilities under legislation, regulation and codes of governance including, but not limited to:

Legislation:

- **Equality Act 2010:** Places a statutory duty upon service providers to ensure people with 'protected characteristics' are not unlawfully discriminated against and have equal access to services. We recognise that many other residents can be vulnerable for reasons other than characteristics protected under the equality legislation and this policy sets out how we aim to respond to those resident's needs.
- **Care Act 2014 and Safeguarding Vulnerable Groups Act 2006:** We recognise that vulnerability and the risk of abuse are connected. Residents who are vulnerable may meet the statutory definition of 'an adult at risk' and in these cases appropriate safeguarding referrals will be made

- **Data Protection Act 2018:** Applies GDPR requirements within the UK and imposes additional obligations for ensuring the security of personal data.

Regulatory:

The Regulator of Social Housing Consumer standards set out several duties for Housing providers in responding to resident's needs in the provision of services.

The Transparency, Influence and Accountability Standard (2024) sets out how service providers should respond to the diverse needs of residents.

2.1 Diverse needs:

2.1.1 Registered providers must use relevant information and data to:

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

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

2.1.2 Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

2.1.3 Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.

2.1.4 Registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services

15. Linked Policies

- EDI policy
- Safeguarding policy

Appendix 1- Factors in Defining Vulnerability

The categories below do not list every factor as the whole spectrum of who could be regarded as vulnerable at any point is wide, but these are the most common factors to take into account when identifying a resident's vulnerability.

Factor 1- Underlying characteristic (it is important to note that these groups may not always require additional support because of this characteristic)	Factor 2- Ability to act, engage and cope	Factor 3 – Life event (this where a resident may have experienced a life event that makes them vulnerable at that point in time)
<ul style="list-style-type: none"> • Age (older people (particularly 75 and over) and 16–21-year-old) • Refugee • Care leaver • Physical or mental disability • Carer • Family with disabled children of all ages • Ex service personnel (Veterans) • Those living with a terminal illness 	<ul style="list-style-type: none"> • Learning disability • Mental Illness • Neurodiversity- for example ADHD and autism • Permanently impaired mobility • Chronic health conditions • Addiction • Where English is not the first language • Unable to read or write • Hoarding 	<ul style="list-style-type: none"> • Recent history of homelessness • Recent move from supported to general needs housing • Bereavement • Recently leaving care • Experiencing ASB or a hate crime • Domestic abuse • Recently discharged from hospital • Debt and financial hardship including worklessness • Pregnancy • Recently released from prison • Cuckooing

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