

Vulnerability, Support for Customers and Reasonable Adjustments Policy

Policy name	Vulnerability, Support for Customers and Reasonable Adjustments Policy
Effective from	May 2026
Effective to	May 2028
Approved by	Customer Connect Panel – March 2026 Risk and Compliance Group – April 2026 Customer Services Committee – May 2026
Date approved	May 2026
Policy owner/department	Director of Housing & Customer
Policy author	Service Manager – Safeguarding and Support
Version number	V2.0

Version Control

Version	Date	Changes	Reason for the changes	Approver
Version 2	18.03.26	Section 6 Inclusion of description of Your Housing Group's (YHG) support services.	Operational Update	Customer Services Committee
Version 2	18.03.26	Change to safeguarding terminology.	Legislative update	Customer Services Committee
Version 2	18.03.26	Confirmation of our approach to safeguarding	Legislative update	Customer Services Committee
Version 2	18.03.26	Changes to YHG team names.	Operational update	Customer Services Committee
Version 2	18.03.26	Change to operational terminology	Operational update	Customer Services Committee
Version 2	18.03.26	Section 6.1 Inclusion of statement confirming that type of support offered linked to accommodation offered	Operational update	Customer Services Committee

Version 2	18.03.26	Section 6.1 Change to description of how support will be assessed and offered	Current good practice	Customer Services Committee
Version	18.03.26	Section 6.1 Inclusion of statement that we will signpost to relevant specialist services if long term support need identified.	Current good practice	Customer Services Committee
Version 2	18.03.26	Section 6.1 Inclusion of statement on mental capacity	Current good practice	Customer Services Committee
Version 2	18.03.26	Section 6.1 Inclusion of description of YHG support for customers impacted by domestic abuse	Operational Update- Domestic abuse team has been re-modelled	Customer Services Committee
Version 2	18.03.26	Section 6.1 Inclusion of list of support related activities we will not undertake	Current good practice	Customer Services Committee
Version 2	18.03.26	Section 6.2 Inclusion of all 9 protected characteristics in description of customer data collected and confirmation YHG will work in line with Equality Act 2010 and Equality Act guidance for neuro-divergent customers.	Current good practice	Customer Services Committee
Version 2	18.03.26	Section 6.2 Statement setting out how we consider a reasonable adjustment and that YHG will consider reasonable adjustment requests irrespective of disclosures of vulnerability.	Current good practice	Customer Services Committee
Version 2	18.03.26	Section 6.3 Confirmation of our approach to reasonable adjustments for customers with vulnerabilities experiencing property related risks.	Current good practice	Customer Services Committee

Version 2	28.04.26	Review process and where adjustment request declined by YHG and template form	Good practice	Customer Services Committee
Version 2	18.03.26	Section 9 Inclusion of reference to UK GDPR and Data Use and Access Act 2025.	Legislative update	Customer Services Committee

The YHG Plan	
Passionate people <input checked="" type="checkbox"/>	Efficient business <input checked="" type="checkbox"/>
Safe buildings <input type="checkbox"/>	Viability <input checked="" type="checkbox"/>
Safe environment <input checked="" type="checkbox"/>	Advocating <input checked="" type="checkbox"/>
Secure and connected <input checked="" type="checkbox"/>	Working in Partnership <input checked="" type="checkbox"/>
	Growth <input type="checkbox"/>

Relevant National Standards or Regulation	<ul style="list-style-type: none"> • Safety and Quality Standard • Neighbourhood and Community Standard • Tenancy Standard
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Relevant Legislation	<ul style="list-style-type: none"> • Anti-Social Behaviour Crime and Policing Act 2014 • Health and Safety at Work Act 1974 • Data Protection Act 2018 • UK GDPR • Data Use and Access Act 2025 • Equality Act 2010 • Housing and Planning Act 2016 • Social Housing Regulation Act 2023. • Mental Capacity Act 2005 • Care Act 2014 • Children Act 2004 and 1989 • Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaab’s Law) • Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) Regulations 2025
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Partner Responsibilities	YHG work with a range of partner agencies to support customers with vulnerabilities or a support need. These include statutory services such as Adult Social Care, Occupational Health, Children’s Services, Mental Health Teams, the Police, Local Authority Domestic Abuse Teams and non-statutory services such as other Registered Housing Providers, advice services such as National Debt Line and Citizens Advice and specialist support agencies such as local domestic abuse services, substance abuse, and mental health services.
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1. Purpose of the Policy

This policy sets out Your Housing Group's (YHG's) approach to providing support to our customers and tenants in order to provide the best chances of their tenancy or lease being sustained, and to improve their customer experience with YHG. This policy also sets out how we will record the information that customers disclose to us in relation to any vulnerabilities.

2. Scope of the Policy

This policy applies to all customers of YHG including tenants, leaseholders and applicants. This policy is applicable to all colleagues and training is mandatory for colleagues who work with customers or assets.

3. Definitions

- **Vulnerability** – Customers who have a particular characteristic and/or experience an exceptional life event and are currently unable to act independently and/or are unable to cope with managing their tenancy without additional support. This can be an interchangeable state which can be influenced by a number of factors and experiences e.g. age, bereavement, mental health, neurological/development disorders (including autistic spectrum disorders (ASD)), disability, poverty, domestic abuse etc.
- **Reasonable Adjustments** – These are changes that YHG when providing services to customers will consider and may implement with customers (where appropriate) in order to prevent their vulnerability or support needs putting them at a disadvantage when accessing our services.
- **UDC** – User Defined Characteristic – the way that we record a vulnerability or other information in relation to a customer or an asset (property) or tenancy.
- **Customer Data** – this is the data that is collected from customers in order for us to be able to improve the services we deliver and may also result in reasonable adjustments being offered.
- **Protected Characteristics** – these are the 9 protected characteristics under the Equality Act 2010, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

4. Consultation

Consultation has taken place with internal stakeholders, and our involved customer groups. This policy has been approved by Customer Connect Panel, Risk and Compliance Group and our Customer Services Committee.

5. Background and Context

YHG provides services to circa 28,000 properties, across a wide mix of tenures including assured tenants, leaseholders, shared ownership and customers in our market rent properties. It is therefore likely that we will be dealing with a range of customers who have a variety of needs, some of which have to be identified and noted to enable colleagues to assist customers in the most appropriate way, in order to meet their requirements, whilst also ensuring colleagues safety.

6. Policy Detail

The aim of this policy is to set out the levels of support that will be provided for customers who are vulnerable or have additional or complex needs. A customer vulnerability can be disclosed to us by a customer, or we may tailor our service to meet the needs of the customer as they are

presenting to us without disclosure, for example, a very elderly frail person who may need additional time and support to carry out a task such as signing a document.

There are a number of different services within YHG that offer advice and support to customers, these include our Tenancy Support Service, Welfare and Benefit Team, and Domestic Abuse Teams. We also deliver support in Supported Housing schemes through Project Officers and in Older Person's Services(OPS) through OPS colleagues. The level of support offered to customers depends on the service and the customer's needs. In any situation where a child or adult with care and support needs is suspected or known to be at risk of abuse, neglect or exploitation, YHG will notify the relevant statutory authority immediately in accordance with our Safeguarding policies and procedures.

As part of our approach to supporting customers, on occasion, depending on presenting factors we may need to:

- Liaise with appropriate agencies to assist in meeting the needs of vulnerable customers.
- Make appropriate referrals to agencies to provide relevant support to vulnerable customers.

6.1 Types of Support Offered

We offer the following support to customers which can vary depending on the customer needs which can also vary depending on the information known and recorded.

- **Welfare Benefit and Debt Advice**

We can offer advice on a one-to-one basis to all customers who either request this or present as needing support with accessing benefits, welfare support (for example emergency food and fuel vouchers) and debt advice. This confidential support can be provided either over the phone or in person either at one of our customer hubs or in the customer's own home if preferred. We will make every effort to engage with customers and to continue working with them to provide the best possible welfare benefit and debt advice and outcomes for them.

- **Housing-based Support**

We can offer support through a number of teams to provide customers with one-to-one support to provide the best chances of them being able to live well in one of our homes. The type of YHG accommodation the customers occupies may also determine the type of support they are offered e.g. Supported Housing, Older People's Services or general needs housing.

The support is tailored according to customer need and demand and could be for one of the following reasons (but this is not an exhaustive list).

- Support to set up a tenancy, including assistance with provision and sourcing of goods, setting up utilities and budgeting for household expenditure.
- Support to maintain independence in one of our Older Persons' Schemes. This can include additional support for reporting repairs and issues; welfare checks and the installation of equipment for emergency purposes.
- Where a customer needs ongoing support to assist with day-to-day tasks that they are unable to do independently due to a vulnerability, for example dealing

with appointments or processes for customers with a diagnosed mental health condition, we may be able to provide immediate assistance then signpost to a relevant specialist service that can provide longer term support.

We will speak to the customer and any agreed representatives to understand the level of support needed and if this is something we are able to offer. If we feel that the level of support is greater than we can provide then we will signpost and make referrals to other agencies who may be better placed to provide this support.

Where we believe a customer may not have the mental capacity to make a specific decision for themselves, or needs additional support to do so, we will work with carers, advocates and legal representatives of customers in line with the Mental Capacity Act 2005 to ensure the individual is still able to access the YHG services they need.

Where a customer experiences a crisis triggered by events such as bereavement, mental ill-health, addiction, or severe change in life circumstances we can offer support. This may include signposting or referring to specialist services or providing direct one to one support or advocacy. We will speak to the customer and any agreed representatives to determine the level of need and if we are able to provide support then we will arrange for a Support Worker to make contact and agree a plan of support.

Where safeguarding concerns have been raised by customers, colleagues and contractors our team will agree an appropriate course of action based on a risk-based person-centred approach. This could include referrals to local authority Social Care to request that they carry out a safeguarding enquiry or a care needs assessment. We will ensure that all safeguarding referrals made by colleagues, contractors and customers are recorded appropriately, and we will also record any incidents where we refer onto another agency.

Our Support Workers can also provide support to customers who have a tendency to hoard, and work in a positive way with those customers to try to improve the condition of the property, so that this is a safe environment for customers to live in and for their neighbours, and our colleagues to carry out their work in. We will also work with Social Care and will sign post to specialist agencies if we cannot provide support ourselves.

Please also see YHG's Hoarding Policy and Safeguarding Policy.

- **Domestic Abuse**

We will offer support to victims of domestic abuse, and we will work with local authorities, police and other agencies to assess and reduce risk to customers and help them access our services and other specialist services as required. We will ensure that we establish a safe method of contact, and as far as practical, engage with the customer in their chosen manner. We will also work with the Multi Agency Risk Assessment Conference (MARAC) for the area to ensure that victims are safeguarded and receiving the appropriate support. Please also see our Domestic Abuse Policy.

- **Type of Activities not covered by YHG's support offer**

There are some types of help which may be requested by customers which sit outside any support offer we might make, examples of these include but are not limited to:

- Personal care – for example help with dressing, personal hygiene
- Domestic help - for example cooking, domestic cleaning
- Counselling, or therapeutic activities

- Medical support or supervision- accompanying customer to medical appointments, arranging medication
- Support to manage physical or mental health conditions

Where these types of interventions are needed, we will assist by signposting to relevant services.

6.2 Recording of customer data, vulnerabilities

We will collect information from customers both at the start of a tenancy or lease and at intervals throughout.

The purpose of collecting the data is to enable us to understand customer needs in order to provide a better quality service and offer a service tailored to the customer where needed.

The type of customer data collected may include ethnicity; marriage and civil partnership; disability; age; gender; religion; gender re-assignment, pregnancy and maternity, language and sexuality and neurodiversity.

Reasonable Adjustments

Many customers with vulnerabilities or protected characteristics do not require support intervention as set out above, but they may require YHG to tailor how we deliver our services so they can fully benefit from them.

This is known as a reasonable adjustment and can include things like a faster appointment slot for an emergency if a customer has a specific need or vulnerability that would impact them more or arranging for a female colleague member to accompany male colleagues to a customer visit due to cultural or other reasons.

Reasonable adjustments are required under the Equality Act 2010 in the UK. YHG are committed to making reasonable adjustments that help individuals access our services with ease, especially when facing barriers due to disability or support needs.

Consideration of a reasonable adjustment

The adjustment made is considered reasonable by looking at the resources available, and the practicality of the change.

We will work in line with the Equality Act 2010 in making reasonable adjustments, including 2025 Equality Act guidance for customers with neurodivergent conditions.

Customers' vulnerabilities and those of their household should be taken into account when offering day to day services, as a customer's needs may be different due to their vulnerability. This means that all colleagues will be trained to look out for vulnerabilities that may affect a customer's ability to receive services, to record this appropriately and to tailor the service where this is possible. We also understand that customers may have hidden vulnerabilities or may not choose to disclose them to us. We will ensure that we remain responsive and consider all reasonable requests for service adjustments whether or not a vulnerability or disability is disclosed.

Some examples of this are given below:

Mr PG

Mr PG let us know that he suffers from post-traumatic stress disorder and is currently being treated for depression and anxiety. As a result, he does not like unannounced visits and prefers

to know who is coming to see him at any given time so that he is able to prepare for the visit and arrange for an advocate to be present if possible.

We would record this on our system which would let others in YHG know that they would need to make appointments in advance rather than sending contractors without an appointment or calling unannounced. This would only refer to the disclosure, as follows:

Customer (and address)	Vulnerability	Notes or reasonable adjustment
Mr PG	Mental health condition - PTSD - Anxiety	Does not want any unannounced visitors – please make appointments

Ms DF

Ms DF advised us that she is not fluent in English. Therefore, where possible Ms DF would like information sent in her preferred language and any telephone or in person conversations to be with an interpreter using a translation service.

We would record this on our system using a UDC so that when we needed to write to Ms DF, we could arrange for text to be translated and also arrange for interpreter services if we needed to speak to Ms DF, so that she was able to understand our communications.

Customer (and address)	Vulnerability	Notes or reasonable adjustment
Ms DF	Language	Not fluent in English please use translation and interpreter

There may be occasions when we cannot deliver or fully deliver requests due to the way our systems work, for example in the case of bulk mail outs. However, requests will be considered and customers informed about options and any reasonable alternatives.

Due to restrictions on the many systems we use and the links between these, it may not always be possible to fully deliver the request, for example when large mail outs are done. Some UDCs will generate an alert, which can be viewed by colleagues to help them deliver services to customers.

6.3 Building related risks

We recognise that building related risk arising out of repair issues, damp and mould or other property issues may disproportionately impact on customers with support needs or vulnerabilities. We will work with the customer and/or their representatives to explore the issues, impact and concerns and provide a tailored solution. This may involve faster appointment times, support whilst work is being carried out or the offer of practical solutions such as additional space heating, or temporary accommodation for the duration of the work.

6.4 Review of an adjustment request decision

Where a reasonable adjustment is requested and we are unable to offer it, the customer can request a review of our decision. See review form in appendix 1. The request will be reviewed by a YHG senior manager who will respond in writing (or by the communication method requested) within 10 working days.

7.Responsibilities under this Policy

The Director of Housing & Customer is responsible for the development, review and implementation of this policy.

8.Risk Management

The following risks have been identified in relation to non-compliance with this procedure

- Breach of the Data Protection Act 2018 resulting in action being taken against YHG by the Information Commissioner's Office.
- Action being taken against YHG by customers due to incorrect or out of date information being held about them, resulting in financial loss and reputational harm to the organisation.
- Health & Safety risk to colleagues and contractors as a result of incorrect or out of date information or no information being available to alert them to a risk.
- Health & Safety risk to colleagues as a result of failing to check the UDCs against a customer or property before carrying out a visit.
- Any relevant information stored in Datix will be transferred to the housing management system manually.

9.Data Protection, Record Storage and Retention

YHG take their responsibilities under the Data Protection Act 2018 UK GDPR and Data Use and Access Act 2025, seriously.

Alerts around customer vulnerability will have to be accessible to appropriate colleagues, but YHG will ensure that only information necessary is included on alerts, that they are subject to regular review to ensure accuracy and relevance and there is oversight offered by both the Risk and Assurance Team and the Data Protection Lead.

Customer data will be retained in line with customer records and fall under the YHG Data Retention Policy. They will be reviewed periodically and removed if no longer needed. If colleagues become aware of the need to remove an alert, they should notify a manager who can remove it.

10. Equality and Diversity

This policy complies with the Equality Act 2010. Issues of vulnerability are considered as part of our customer offer and services tailored as required. This is done on a case-by-case basis.

This policy has been Equality Impact Assessed and any findings addressed.

This policy is available in alternative formats on request

11.Communication

This policy will be stored on the YHG intranet and a communications plan is in place to notify colleagues.

This policy will be a mandatory read for all colleagues who are customer facing.

12.Learning and Development

All colleagues who interact with YHG customers and assets will be trained on this policy.

13.Performance Management of this Policy

We will monitor the effectiveness of our support offer to customers in a variety of ways, including (but not an exhaustive list):

- Number of referrals into each support service
- % of tenancies sustained
- Support provided to customers with reasonable adjustments

14. Review of this Policy

This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Group wide policies. The Director of Housing & Customer has responsibility for updating this policy.

Related Documents

Document Type	Name
Connected Policies and Procedures	Domestic Abuse Policy and Procedure Hoarding Policy Safeguarding Policy and Procedure Customer Feedback Policy
Forms and Letters	As above – where applicable
Leaflets/Publicity Material	As above – where applicable
Training Materials Available	As above – where applicable
Intranet/ Website Page	Will be uploaded once approved

Appendix 1

REASONABLE ADJUSTMENT REVIEW FORM

Customer Name:

Address:

Telephone / Email:

Date of Request:

Reference / Account Number:

Reasonable Adjustment Requested:

Why do you believe the refusal of this reasonable adjustment was unreasonable?

Outcome you are seeking:

Signature and Date: