

Helping You Access Our Services Policy

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1. Our policy statement

- 1.1. This policy defines what a reasonable adjustment is, in what type of circumstances we'll make them, how customers can request them and how we define, assess, and record vulnerability to meet customers' needs, when necessary.
- 1.2. We acknowledge and understand that by having a disability, it does not automatically mean a person is vulnerable. Equally, not all our customers with vulnerable needs have a disability.
- 1.3. This policy is a statement of our commitment to ensure customers with disabilities and/or vulnerable needs aren't at a disadvantage when accessing our services.
- 1.4. Our wider suite of policies and procedures will advise how service areas adapt to meet the needs of customers with additional needs and provide further support, where necessary. This support may be delivered by us or appropriately through referral to external agencies.
- 1.5. We're 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 customers and when delivering our services.
- 1.6. We'll work with support workers, advocates, family members, or other professionals with disclosure authority to meet the needs of our customers and ensure any necessary support is in place.

2. Vulnerable needs

- 2.1. This policy focuses on customers who are vulnerable but have capacity to make their own decisions. Where a customer has been assessed as lacking or believed to lack capacity, we will work with their care authority appointed person(s) or authorised representatives.
- 2.2. Sage Homes identifies a vulnerable customer as "any person who is experiencing temporary or permanent difficulties with everyday living and/or is in need of additional support services or currently unable to act independently and/or are unable to cope with managing their tenancy without additional support". For possible factors defining vulnerability please see Appendix A.
- 2.3. Customers will be asked whether they, or any household members, have any additional needs at the start of their tenancy. During any type of contact, colleagues may enquire about a customer's needs, and customers are encouraged to state their needs whenever possible.
- 2.4. We expect colleagues and third-party contractors to anticipate the vulnerable needs a customer 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 customers records.
- 2.5. We recognise that some customers will have a degree of vulnerability that may impact how they are able to manage their home and that a customer can become vulnerable at any point during their time in a Sage home. As such, every customer contact with Sage is an opportunity to identify whether they are vulnerable and in need of additional support.
- 2.6. Every customer will be treated as an individual when we assess their circumstances in determining the level of support required. We will not assume whole groups of people are vulnerable.
- 2.7. When a customer is identified as someone in need of additional support, either at the

beginning or any other point during their time in a Sage home, our staff will seek to signpost or refer them to any appropriate support agencies that may be able to assist. We will make reasonable adjustments to help the customer to use our services in a way that suits their circumstances and communicate with them in a manner that factors in any accessibility needs.

- 2.8. We will make safeguarding referrals upon identifying customer needs or support under our Safeguarding policies.
- 2.9. As a responsible landlord, we take account of known vulnerability factors in the provision of services and in decisions around tenancy management and enforcement.
- 2.10. Sage Homes will consider any additional needs due to the vulnerability and where appropriate vary our service delivery to ensure vulnerable customers still receive the same level of service.

3. Reasonable adjustments

- 3.1. A reasonable adjustment is a legal term defined by the Equality Act 2010. Its purpose is to make sure all our services can be equally accessed by customers with vulnerabilities and those without. Examples of reasonable adjustments include (but are not limited to):
 - A physical alteration to one of our homes (e.g. adapting a bathroom or installing handrails)
 - An adjustment to how we communicate (e.g. providing information in alternative formats).
- 3.2. The type of additional assistance or adjustments provided will depend on the level of vulnerability and the specific circumstances of the customer. Additional assistance may be provided by Sage staff directly, third parties acting on our behalf, or via referral to external agencies.
- 3.3. Many of the adjustments to our services we offer can also be made available to our customers without disabilities.

4. Communication

- 4.1. We expect colleagues and third-party contractors working on our behalf to adjust how they communicate with customers to meet their additional needs, where necessary. This can include:
- 4.2. Asking customers if they have a specific communication need and applying that accordingly.
 - Allowing more time to understand information and/or make decisions
 - Providing information in alternative formats
- 4.3. We'll support our colleagues by encouraging them to take extra time or to be flexible when responding to customers with vulnerabilities and/or additional needs
- 4.4. We'll inform customers of any support available to them to meet their needs

5. How to request a reasonable adjustment

- 5.1. A reasonable adjustment can be requested from us in the following ways:
 - By the customer 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 customer's needs.
- 5.2. Details about how we will handle your request is within our Accessible Homes Policy.
- 5.3. All records regarding vulnerable customers including all communication and attempted contacts, offers of support and referrals will be recorded securely on our housing management system.
- 5.4. We will also record information where there's anyone with delegated authority to speak to us on the customer's behalf. This is to make sure that our colleagues have advanced knowledge of any additional factors to consider when delivering services. If there are support agencies working with the customer that they can liaise with to resolve any housing issues. We will review this data regularly to make sure it is accurate and up to date.
- 5.5. We will review our records regarding vulnerable customers as part of our periodic tenancy reviews and customer interactions.
- 5.6. This policy has been developed in line with:
- Human Rights Act 1998 and Equality Act 2010
 - The Care Act 2014 and Mental Capacity Act 2005
 - Data Protection Act 2018 and UK GDPR
 - Housing Ombudsman Complaint Handling Code 2024
 - The RSH Consumer Standards and Tenant Involvement and Empowerment Standard
 - The Housing Ombudsman Service's release of its latest learning from severe maladministration report, focusing on adaptations and landlords' response to mental and physical needs - January 2025.
 - The Housing Ombudsman Services' spotlight report on attitudes, respect and rights - January 2024.

6. Equality and diversity

- 6.1. Sage is committed to making sure all services are accessible to all our customers. Our staff will be trained to make sure they are communicating appropriately with our customers, and they have the relevant information.
- 6.2. This policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristic defined within the [Equality Act 2010](#).
- 6.3. On request we will provide translations of all our documents, policies and procedures in various languages and formats including braille and large print.

7. Delivery of this policy

- 7.1. This policy should be read in conjunction with other policies which can be found on our

website [here](#):

- Accessible Homes Policy
- Antisocial Behaviour Policy
- Domestic Abuse Policy
- Safeguarding Adults at Risk Policy
- Safeguarding Children and Young People Policy.

7.2. The effective delivery of this policy including training, guidance and support required by staff for implementation of this policy will be provided by the Homes and Communities Team.

8. Compliance and monitoring

8.1. Compliance with this policy will be monitored by periodic reviews of case records by the relevant team manager.

1.1. Any customer who receives support from our tenancy management team or in temporary accommodation will have their cases reviewed regularly.

9. Policy review

9.1. We will review this policy at least once every three years to make sure it remains relevant and accurate and at any point where:

- Legislation/ regulation or industry changes require otherwise, making sure that it continues to meet our aims and industry best practice; or
- We identify any problems or failures in this policy as a result of customer and stakeholder feedback, complaints, or findings from any independent organisations.

Version	Checked by	Amendments	Approved at/by	Date of Approval	Published by	Date of Next Review
1.0	Homes and Communities Manager	Introduction of Policy	Head of Housing Operations	April 2024	Office Services	April 2027
1.1	Head of Housing Operations	Review following Housing Ombudsman report	Customer & Assets Committee	February 2025	Policy & Service Improvement	February 2028

Appendix A - possible factors in defining vulnerability

The below factors show possible factors to consider when considering if a customer is vulnerable. These are not exhaustive but cover the more common factors.

Factor one: situational characteristics

People in these groups may not need additional support purely because of these characteristics, but they should still be considered.

Those who are:

- Families with disabled children
- Single parents under 21 years old
- Caregivers or carers
- Leaving care
- 16-21 years old
- 75 years old +
- Disabled
- Ex military or services
- Seeking asylum or refuge
- Living with terminal illnesses

Factor two: personal characteristics

This factor looks at those personal characteristics that may affect a customer's ability to engage with others and cope with their situation. Customers with one or more of these characteristics may be classed as vulnerable.

People with:

- Neurodiversities (including autism spectrum disorder and dyspraxia)
- Impaired mobility (permanent), frailness, or chronic health conditions
- Age-related conditions that affect independent living
- Learning disabilities
- Mental illnesses
- Low/ no literacy levels
- Low/ no English language skills
- Substance/ alcohol abuse issues (including addiction)

Factor three: recent life experiences

Customers may not meet relevant points from factors one and two but could have recently experienced an exceptional or traumatic event and may be classed as currently vulnerable.

These events might include:

- Experiencing bereavement of a close family member
- Being pregnant, giving birth, suffering a miscarriage or stillborn child
- Being discharged from hospital/institutional care
- Being released from prison
- Suffering sustained physical or mental illness at home
- Experiencing homelessness
- Living in/ recently left a refuge or homeless person's hostel
- Moving from supported accommodation to independent living
- Leaving care as a young person
- Experiencing sexual, domestic or racist abuse, or harassment/hate crimes
- Holding multiple debts and experiencing fuel or food poverty
- Dealing with children being excluded from school
- Returning from conflict as ex-service personnel.

Other indicators of vulnerable needs and that further support or assistance could be offered to customers include **but not limited to**:

- Antisocial 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 customer previously had good payment history.