



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Housing Operations

Document Ref No: GRPOLHM30

Subject Title: Reasonable Adjustment Policy

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Introduction

- 1.1 Many customers of the Group will have protected characteristics (as defined by the Equality Act) that may impact how they are able to manage their tenancy or access services. A customer can also become more vulnerable or less over the course of their tenancy. This Policy sets out the general approach we will take in these circumstances.
- 1.2 It is against the law to discriminate against someone because of the following protected characteristics as defined under the Equality Act 2010 :
- age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation
- 1.3 In addition some customers may be vulnerable. Vulnerability can be a variable state and can occur at different points in a person's life. It can be temporary, periodic or recurring as well as ongoing and developing over time. There are a number of indicators that someone may be vulnerable or in need of individual support.
- 1.4 The aim of this Policy is to ensure that all customers have equal access to services provided by the Group and that the Group is able to tailor services to meet need. This approach will help customers to sustain tenancies, safeguard customers, and promote wellbeing.
- 1.5 The Housing Ombudsman recognises that social landlords have a proud history of tackling social injustice and should contribute to tackling new social injustices in health, equality, and race. They also recommend that social landlords should debate and define what being vulnerable means in social housing.

2 Scope of the policy

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- 2.1 This document relates to all of the Group's customers who meet the definition detailed below, regardless of the property type that they are occupying, or the nature of their relationship with the organisation.
- 2.2 This policy should be read in conjunction with safeguarding policies as it also aims to address welfare concerns that may not have met the safeguarding criteria, but where customers may need additional support, for example to sustain their tenancy.
- 2.3 All employees need to be aware of this policy; understand the contents; and be able to implement it in practice at an operational level.

3 Responsibility

3.1 Executive Leadership Team (ELT)

The ELT are responsible for promoting equality, diversity and inclusion in the workplace and creating an organisational culture where customer needs are considered as part of any decision making.

Heads of Services, and line managers

- 3.2 It is the responsibility of Heads of Services and line managers to have read and understood the policy and the values & principles embodied within it. Colleagues will raise awareness within their departments and ensure their teams are fully aware of the policy and are implementing it in practice.
- 3.3 It is the responsibility of each Head of Service to monitor and implement this policy and ensure that any welfare concerns that are raised are addressed and tracked where they do not meet the safeguarding thresholds, but where there are still concerns raised.

All employees

- 3.4 It is the responsibility of all employees to read, understand and implement the policy. Colleagues will be innovative in finding flexible ways of providing services that meet the needs of all customers. Colleagues will embed safeguarding approaches to their roles and will promote and support wellbeing in all aspects of housing management and service delivery.

4 Policy

Responsibility of Progress Housing Group

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- 4.1 The Group will fulfil our obligations around human rights, including the Equality Act when delivering services to customers.
- 4.2 The Regulator of Social Housing Consumer Standards require registered providers to treat all tenants with fairness and respect, and to demonstrate that they understand the different needs of tenants, including in relation to the equality strands and tenants with additional support needs.
- 4.3 The Housing Ombudsman Complaints Handling Code 2020 states that landlords should “comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. Landlords shall have a reasonable adjustments policy in place to address this”.

What is Vulnerability?

- 4.4 ‘Vulnerability’ can be a changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc. The more common characteristics, events and factors we take in to consideration when considering individual needs are included at **Appendix 1**.
- 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 what reasonable adjustments they may require to sustain their tenancy or access Group services.
- 4.6 A person’s ability to cope with daily life varies and so taking a person-centred approach is an important factor in considering vulnerability. For example many older or disabled people are very independent and active so may not need any additional assistance to sustain their tenancy.
- 4.7 Where we have identified issues of vulnerability or where a customer expresses a need for a service to be adapted due to a protected characteristic, we will provide services which are sensitive to and responsive to their needs and circumstances to enable them to fully access our services and sustain their tenancy. It is important that we ask them how we can adapt our services to meet their needs.

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4.8 We will ensure colleagues working with customers are trained to comply with best practice.

4.9 Where we do not have the expertise required by a particular customer, we will work with suitable partner organisations to ensure that appropriate support is made available by working with other agencies.

Identifying additional needs

4.10 Vulnerability and or additional needs may be identified by:

- customers, when they apply for housing or contact us, or self-refer
- any member of the Group who has contact with customers in person, on the phone or through any other channel of communication
- our contractors
- a referral from an external agency or organisation.
- as a result of a report of antisocial behaviour due to mental health issues
- a report of harassment or domestic violence
- a repeated failure to respond to correspondence or to answer the door when visited
- a report of hoarding, self-neglect/abandonment or other behaviour which results in the person's home/ and or garden becoming damaged, neglected or otherwise unfit for occupation.
- erratic rent payments and falling into arrears when the tenant previously had a good payment history
- struggling to manage tenancy, such as utilities cut off by supplier
- in supported housing schemes, refusing to access support
- any other signs of abuse or neglect, such as lack of food/health support

How will we support people we identify as vulnerable or who need extra support?

4.11 Where we identify vulnerability we will: take account of known protected characteristics in the provision of services and in decisions around tenancy management and enforcement including:

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- assisting customers in accessing additional services that they may need
- recording any known third party representatives who act as a 'delegated authority' or with power of attorney to act on the customers behalf.
- considering any additional needs and where appropriate making reasonable adjustments to service delivery to ensure all customers receive the same level of service
- making appropriate referrals to the Group's own advice and support services to provide enhanced support where appropriate to do so
- referral to statutory agencies and other external partner support agencies where appropriate to ensure equal access to services and make reasonable adjustments for those with protected characteristics under the Equality Act 2010
- reporting any safeguarding concerns for adults at risk or children (i.e. domestic abuse, physical, emotional or financial abuse) to the relevant local authority in accordance with the Safeguarding Policies
- prioritising repairs according to their urgency and customers' particular needs or vulnerabilities where appropriate
- supporting adaptations to a property to accommodate a disability in accordance with the Aids and Adaptations Policy
- exercising discretion when making tenancy management decisions including granting a tenancy, taking rent arrears/possession action, effecting management transfers, approaching hoarding, applying recharges, and supporting victims of anti-social behaviour
- supporting customers to sustain their tenancy by sign-posting and accessing support services with relevant partners
- considering making provision for the requirements of customers with particular needs in new developments, such as appropriate size and space standards, access and safety, appropriate fixtures and fittings, and support requirements
- providing support through Tenancy Sustainability Fund to enable customers to continue to maintain their tenancies
- recording on the customer record any known vulnerability, 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

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will have advance knowledge of any additional factors to consider when delivering services.

Making Reasonable Adjustments

4.12 The Group recognises it's legal obligation to make reasonable adjustments to our services and facilities to remove barriers to customers accessing services. This means changing or adapting services to meet the individual needs of tenants. Examples are as follows:

- Pre-Action Protocol for Possession Claims by Social Landlords (2015). This protocol sets out the requirements that a Registered Provider of Social Housing must have either considered or complied with in relation to possession proceedings.

The protocol requires us to consider the vulnerability of the tenant prior to the commencement of proceedings. If we are aware the tenant has difficulty reading or understanding information, we must take reasonable steps to ensure that we have communicated appropriately and that the tenant understands any information we have given.

- Providing an aids and adaptations service to support tenants to live independently in their own home as long as possible.
- Providing pictorial information for people with a learning disability, such as a pictorial tenancy agreement.
- Understanding any health issues that may require repairs to be prioritised more quickly.
- Involving customers when developing new process and policies.
- Ensuring customers can nominate a third party to help manage their tenancy.
- In supported living properties, liaising regularly with tenants and their support providers to ensure their needs are met.
- Providing documents or correspondence in larger print or in a specific colour contrast to aid those with visual impairments or dyslexia.
- Allowing extra time for responses or providing alternative means of communication such as email or telephone for those with communication difficulties.
- Providing sign language interpretation or other communication support.

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- Where reasonable, ensuring physical access to buildings or facilities, including ramps, lifts, and accessible toilets.

4.13 The Group is committed to ensure that when providing services it does not place a specific person with disabilities at a disadvantage. The Equality Act 2010 calls on organisations to take such steps as is reasonable to have to take to avoid the disadvantage. This is to ensure that individuals receive the same quality and level of service as someone without a disability, where this is possible.

4.14 Adjustments only have to be made if it's reasonable to do so. What is a reasonable adjustment will be factored in with considerations including:

- disability;
- how practicable the changes are;
- if the change would overcome the disadvantage customers and other disabled people experience;
- how much money and resources are available;
- the cost of making the changes;
- if any changes have already been made

4.15 The Group will try and be proactive, without waiting for a specific request. This is particularly important with hidden disabilities when an individual may feel unable to volunteer their need for a reasonable adjustment until asked.

Requesting a reasonable adjustments

4.16 Customers can request that we make reasonable adjustments in the following ways:

- in person
- in writing for example by email, by post, text
- by telephone
- by a family member/support provider/third party when we have been given permission to do so; and or
- a member of staff may suggest for one to be made, when they are aware it will support the customer needs.

4.17 We will not assume what reasonable adjustments a disabled person may need, but we will consider any request and discuss this with the person to agree any possible changes.

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4.18 The Group will assess requests for reasonable adjustments on a case-by-case basis, taking into account factors such as the nature of the adjustment, the cost and practicality of making the adjustment, and the availability of resources. The Group will aim to agree on reasonable adjustments with a minimum of delay and implement them in a timely way. If the Group cannot agree to make an adjustment, it will provide a clear explanation of why it is not possible and suggest alternative adjustments or extra support available.

Communicating with our customers

4.19 We will advertise and communicate about our services using a variety of platforms to engage with our customers in a way which meets their needs. This includes via social media, our website, email/text, hard copy, large print, and pictorial communications where we are requested to do so.

4.20 We will provide translations, interpreters, signers, Braille or large print documents to meet identified needs as appropriate. We also recognise the role of carers, advocates, and personal representatives, and where appropriate, shall take their views into account when consulting vulnerable customers on issues which affect them.

4.21 In line with the Group's Data Protection policies any request by a person will be recorded on internal systems and will be used to meet the person's specific needs (each time they contact the relevant service) throughout.

Communicating with our Contractors

4.22 Safeguarding is a standard agenda item on contract meetings and this is included in contract management training. As part of procurement, contractors will be asked for their policies on equality and diversity, safeguarding, and modern slavery.

Implementation

5.0 This Policy will be made available to all colleagues. This will be reinforced with training and management supervision of all employees involved in dealing with vulnerable customers.

Consultation

6.0 This Policy has been reviewed by internal stakeholders such as the Safeguarding Review Group, Operational Leadership Team, EDI Working

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Group and Senior Leadership Team. This policy has also been shared and agreed with the Tenant Voice on xxx.

Review

- 7.0 This Policy will be reviewed every three years unless changes to internal policies or legislation require a review to be carried out sooner.

Equality impact assessment

- 8.0 An Equality Impact Assessment has been produced for safeguarding all customers and the development of this policy helps to ensure services can be tailored as may be required for people with protected characteristics as defined in the Equality Act. This is available on request.
- 8.1 All staff receive Equality and Diversity training on joining the Group and are responsible for ensuring that the Equality and Diversity policy is incorporated into all work activities and all dealings with customers and colleagues. The Equality and Diversity policy is available on the website or on request.

Appendices

- 9.1 Appendix 1- Examples of people who might be vulnerable and where the Group may need to adapt service delivery

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Appendix 1

Examples of people who *might* be vulnerable and where the Group may need to adapt service delivery

Examples include, but are not limited to:

- people with a physical, sensory, or learning disability
- people with mental health issues
- people who are seriously ill
- people experiencing domestic abuse
- older people
- single parent families
- pregnant women (especially teenagers)
- unemployed people
- former members of the armed forces
- people leaving care
- ex-offenders
- people who are considered to be financially excluded
- people with substance abuse problems
- people who have difficulties understanding, speaking, or reading English

During a resident's customer journey with Progress Housing Group, indicators or points of vulnerability might include:

- homelessness / repeat homelessness
- people in supported housing
- hospitalisation
- periods following discharge from hospital or other institutional care
- people who are in supported housing who refuse to access the support offered
- periods of sustained illness at home
- bereavement / divorce / relationship breakdown
- period of change from supported accommodation to independent living
- evidence of neighbour harassment or abuse toward the individual or household
- evidence of anti-social behaviour by the individual or household

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unemployment / reduction in hours