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Reasonable Adjustments Policy

A Sovereign Network Homes Policy

October 2023

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1. Policy summary

The summary provides easy access to the key points in this Policy. However, we would suggest that if you wanted a full understanding of the policy that you read the whole of the policy.

Sovereign Network Homes recognises that some customers will require additional support in accessing our services and in meeting their tenancy obligations. We aim to help our customers to sustain their tenancies/licences/leases, e.g., paying the rent and service charges and not to cause nuisance behaviour.

This policy aims to consider how we may make reasonable adjustments for vulnerable customers to access our services, however, it is not intended to deliver a faster service. More information on how we decide whether to make a reasonable adjustment is covered under Section 5 of this policy.

Vulnerability is considered in this policy for those people with a physical or mental health disability or those with additional needs.

2. Introduction

Sovereign Network Homes recognises that some customers may need services adjusted due to a physical or mental health disability or an additional need to make services more accessible and enable them to sustain their tenancies. These needs may put them at risk of losing their home, or in situations where, without support or intervention, may increase their risk of abuse or neglect.

This policy covers our tenants, shared owners, and leaseholders.

3 Aims and Objectives

3.1 The policy covers how we and our contractors identify customers who are vulnerable and the support we can provide. (See Appendix 1)

3.2 The objectives are intended to:

- Consider when to make reasonable adjustments to our services
- Ensure we comply with all legal and regulatory requirements and standards.
- Ensure safeguards are in place to protect vulnerable people when they face legal action.
- Ensure our services are accessible by advertising and communicating

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about our services using a variety of platforms.

- Ensuring vulnerabilities are recorded on either our NEC or Customer Hub system and that colleagues and contractors use this data to reasonably adjust the service the customer receives
- Ensure that staff use this policy and apply its principles when developing strategies, policies, procedures, and services.

4 Policy Statement

4.1 This policy sets out Sovereign Network Homes approach to the identifying, assessing, and recording of vulnerable customers and their needs in order to reasonably adjust our services. Appendix 1 details how we may identify when a reasonable adjustment is required.

4.2 This policy is the responsibility of all staff, managers, and board members. It is important they are aware of how vulnerability may act as a barrier in terms of customers accessing and receiving services, and to identify how and when their own area or function may be improved to meet the needs of vulnerable customers.

4.3 All staff are responsible for flagging up customer vulnerabilities, and either updating our Housing Management System or arranging for a colleague to do so. All staff are responsible for determining whether a reasonable adjustment should be made to meet the needs of the customer, more information is contained in Section 5 of this Policy. Guidance on how to update our Housing Management System is included under Appendix 1.

5 How to determine what a reasonable adjustment is?

The Equality and Human Rights Commission, advises when deciding whether to make a reasonable adjustment, to enable a service to become more accessible to a customer, you should consider:

- The practicability of the adjustment to the service
- The cost of the adjustment to Sovereign Network Group
- The availability of our resources

6 What happens where a person is identified as vulnerable and requiring a reasonable adjustment.

6.1 We will:

- Consider making adjustments or our services using the criteria within Section 5 of this Policy. Examples of adjustments can include:

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- providing a letter in large print or translating a key legal document,
 - Translating a tenancy agreement for a new customer, whose main language is not English
 - Using the services of an interpreter to support a customer in key area's affecting their tenancy, for example rent arrears through Language Line [Document Preview - Language Line Translation service - Accessing an interpreter \(networkhomes.org.uk\)](#)
 - Allowing time for a customer to answer the door due to mobility needs
- Review and update our Housing Management system for those who have completed an Authority for Sovereign Network Homes To Represent Form.
 - Update our Housing Management systems with details of their vulnerability including how we could provide the service to meet their needs
 - Provide opportunities for vulnerable customers to engage with us so we can assist them in providing a service. For example, to report Anti-Social Behaviour to us where the report relates to a protected characteristic, under the Equality Act 2010.
 - Provide an aids and adaptations service as per our Aids and Adaptations Policy.
 - Support customers affected by hoarding under our Hoarding Policy.
 - Provide support to customers as per our Safeguarding Policy
 - Complete vulnerability surveys when we alter a fire evacuation strategy, to enable us to consider and respond to needs
 - Ensure that vulnerabilities identified either by a contractor or recorded as part of a damp and mould inspection are updated on our Housing Management System.

7 What happens where a customer might lack mental capacity?

7.1 In line with the Mental Capacity (Amendment) Act 2019 - [Mental Capacity \(Amendment\) Act 2019 \(legislation.gov.uk\)](#) and Mental Capacity Act 2005, Sovereign Network Homes will liaise with those who have legal authority to act on behalf of our customers who lack capacity. This can include:

- A Lasting Power of Attorney.
- Deputyship Order from the Court of Protection.
- Litigation friend appointed in court proceedings.
- Independent Mental Capacity Advocate commissioned by the Local Authority.
- Appointee appointed by the DWP to manage their benefits.

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- Where we have a completed Representative Consent Form from the customer.
- Where we suspect a customer lacks mental capacity, we will make a referral to adult care services to enable them to complete an assessment.

8 Responsibilities

8.1 The responsibility of ensuring this policy is adhered to will be the responsibility of the Executive Leadership Team, with direct day-to-day activities delegated to the Executive Director of Customer Services.

9 Training

9.1 Sovereign Network Homes delivers safeguarding, data protection and equality, diversity and inclusion training to all staff. This training enables all to recognise potential signs of vulnerability such as:

- Anti-social behaviour because of mental health issues, being a victim of anti-social behaviour, perhaps due to disability, ethnicity, or sexual orientation.
- Repeated failure to respond to correspondence, answer the door, or erratic rent payments.

9.2 Provide reasonable adjustment training to all customer facing colleagues to enable them to be clear when to record, how and where record and how to adjust a service.

10 Related Documents

10.1 All policies and procedures within Sovereign Network Homes will be relevant to this policy and include:

- Customer Care Policy
- Antisocial Behaviour Policy
- Equality, Diversity and Inclusion Policy
- Data Protection and Compliance Policy
- Income Collection policy
- Complaints and Service Recovery Policy
- Complaints Policy and Procedure for Consumer Credit Activities
- Safeguarding Policy and Procedure
- Mental Health Liaison Policy
- Disabled Adaptations Policy
- Repairs Policy
- Responsible Lending Policy
- Hoarding Policy, Procedure and Toolkit

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- Representative Consent Form
- Charitable Fund Policy and Procedure
- Compensation Policy
- Fire Safety Policy
- Vulnerable Persons Procedure
- Damp and Mould Policy and Procedure

11 Legislation and Regulation

11.1 The legislation listed in this policy is not an exhaustive list but includes:

- Governance & Financial Viability Standard
- The Tenancy Standard
- The Tenant Involvement and Empowerment Standard

11.2 The legislation listed within this policy was considered at the time of the development of this policy, but subsequent primary and secondary legislation, case law and regulatory or other requirements will be considered, and the policy reviewed and adopted in accordance with the requirements set out therein, even should such subsequent legislation not be explicitly listed within this policy. Any queries relating to the applicable legislation should be directed to the policy author.

- Data Protection Act 2018
- Equality Act 2010
- Mental Capacity Act 2005
- Mental Capacity (Amendment) Act 2019
- Care Act 2014
- Mental Health Act 1983
- Human Rights Act 1988
- Safeguarding Vulnerable Persons Act 2006
- Equality and Human Rights Commission advice on workplace adjustments

12 Complaints

Any customer or other stakeholder who is dissatisfied with how we have worked with them regarding their vulnerabilities, is able to submit a complaint using our Complaints process, this can be found on our Intranet and website. Once our Complaints process has been exhausted, and if they remain dissatisfied, then they can contact the Housing Ombudsman Service.

13 Equality, Diversity and Inclusion

We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.

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14 Review

All policies should be reviewed every three years as a minimum, or sooner if there is a specific legislative, regulatory, or service requirement or change in guidance, law, or practice.

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Appendix 1

We have captured the ways in which we can identify and reasonable adjust our services

Nomination stage:

- Nominees for housing are assessed in terms of their capability to hold and sustain a tenancy and to determine any support that will be required. Sovereign Network Homes may decline a nomination where (amongst other reasons) we consider the proposed tenant will be unable to sustain a tenancy as a result of a care or support plan not being in place or available. In the unlikely event this happens, we will communicate with the relevant Local Authority.

Viewing and Sign Up:

- Necessary arrangements will be put in place for the viewing (e.g., where the customer has a support worker, they are invited to attend, or translation/signing services are arranged). A checklist will be completed which may highlight vulnerability issues that had not previously been identified.
- Viewings are always accompanied as a further means of identifying vulnerability and assessing suitability of the property offered.
- During initial signup or during other home visits.
- Customer-facing staff (e.g., in Customer Services, Housing Management, Support Services, Income, Customer Involvement, Estates Services and Asset Management) during their routine contact with customers.
- Six weekly New Tenant Contact - this can be completed either by phone or in person.

Risk Assessment Forms:

- These are completed as part of Sovereign Network Homes policies and procedures for dealing with anti-social behaviour, domestic abuse, and harassment and hate crime and will seek to identify where either the victim or the perpetrator is vulnerable.

Proportionality Form:

- This form is required to be completed by officers and provided to the legal team on referral for any legal action; this will identify any known vulnerabilities which will be considered by the legal team.

Health and Safety Assessments and Home Visits for any risk assessment:

- When staff or contractors complete Risk Assessments and Housing, Health and Safety ratings of hazards or potential hazards, vulnerability will be taken into account.

Home Visits:

- As per our Safeguarding Policy and Procedure, colleagues and contractors working on behalf of Sovereign Network Homes have the responsibility to report back any

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customer vulnerabilities they notice when visiting a customer in their own home.

- Raising of concerns from other Agencies (for example GP, Police, Probation Service and Advocacy Agencies).
- Where we receive a notification regarding a customer vulnerability, we will commence a safeguarding review as per our Safeguarding Policy.

NEC Housing Management System:

Customer vulnerabilities identified to us should be recorded on our NEC system. To add vulnerabilities, please use this link - [NEC Housing Adding Notes .pdf \(sharepoint.com\)](#)

They can also be recorded on Customer Hub and become visible on NEC within 24 hours.

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