

# Vulnerability and Reasonable Adjustments Policy

July 2024



<b>DOCUMENT CONTROL</b>			
<b>SUMMARY</b>			
This policy describes how Torus will work with vulnerable tenants and residents, so that customers can access and benefit from our services. It explains what we mean by the word 'vulnerable' and shows how people with vulnerabilities can access housing support.			
	<b>Name</b>	<b>Position</b>	<b>Date</b>
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All customer-facing colleagues in Housing, Assets, Torus Foundation, Torus Developments and HMS.			
<b>ASSOCIATED DOCUMENTS</b>			
Customer Experience Strategy 2024-2027			
All Torus customer-facing policies			
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**EXECUTIVE SUMMARY..... Error! Bookmark not defined.**

**1. Introduction ..... 4**

**2. Policy Statement..... 5**

**3. Implementation ..... 7**

**4. Consultation..... 10**

**5. Inclusion ..... 10**

**6. Monitoring and Review ..... 11**

**Appendix A – Common vulnerability factors ..... 12**

**Appendix B..... 14**

## Executive Summary

- This policy explains how Torus can help support tenants and residents who are vulnerable or are struggling to cope with exceptional life events.
- It applies to different service areas at Torus, including the Housing and Assets teams, as well as Torus Foundation, Torus Developments and HMS.
- All Torus colleagues who support tenants and residents should follow this policy when new services are designed and planned, and in their day-to-day activities. When a vulnerability is identified, we will aim to provide the most appropriate solutions to assist vulnerable people.
- Vulnerability is when:

A person or a household is experiencing difficulties with everyday living and require additional support to manage their tenancy and/or access Torus services.

- We will aim to record details of the tenant or resident's vulnerability on our housing management system as a 'Customer Alert'. The alerts will be regularly reviewed and updated – this recognises that vulnerability is not necessarily permanent and can change over time.
- Torus may keep information relating to vulnerabilities and protected characteristics to ensure colleagues understand a tenant or resident's individual needs. This information may be used to understand the numbers of tenants and residents with potential barriers to accessing services and to guide potential changes to services in the future.
- This policy shows how we may adapt services to support the needs of vulnerable people.
- Tenants and residents can ask for a reasonable adjustment by contacting the Torus Customer Hub or by speaking to a Torus colleague, such as a Housing Officer or Customer Liaison Officer.
- Each service area at Torus will consider how changes may be made to the way we normally deliver services to meet the individual needs of vulnerable tenants and residents. Adjustments may include:
  - Allowing longer for tenants and household members to get to the telephone or door
  - Arranging for more than one person to visit for appointments
  - Agreeing a nominated contact person (a carer, for example)
  - Explaining a letter in person or over the phone, rather than just sending it
  - Making sure a translator is available when vulnerable tenants need them
- Appendix 1 of this policy (pages 12 and 13) includes a list of the common factors that may indicate a tenant or resident is vulnerable.

**1. Introduction**

1.1 This policy describes how Torus works with vulnerable tenants and residents, so that customers can access and benefit from our services. It explains what we mean by the word ‘vulnerable’ and shows how we can help people with vulnerabilities access housing support.

1.2 Torus provides a significant amount of additional support for vulnerable tenants and residents, and for people facing exceptional circumstances who are struggling to manage their tenancy. To do this properly, we must be consistent. Every Torus colleague who supports tenants and residents needs to have the right information, understanding and tools to respond properly to vulnerable people’s needs. This policy explains how we will achieve this.

1.3 This policy describes:

- 1. How vulnerable tenants and residents may be identified
- 2. How we may make adjustments and support to vulnerable people
- 3. How the guidance may be used when developing and delivering services
- 4. The roles and responsibilities of different Torus teams
- 5. How we may make adjustments to our service delivery offer

1.4 This Vulnerability and Reasonable Adjustments Policy supports our Customer Experience Strategy aims, to help tenants and residents benefit from ‘positive, supportive interactions each time they contact us, built on respect, empathy and understanding’ and to understand tenants and their diverse needs.

1.5 This policy provides guidance for customer-facing activities. It should be used in conjunction with all tenancy and neighbourhood policies, and particularly with the following:

- Customer Alerts Procedure & Process
- Safeguarding Adults Policy, Procedure & Process
- Safeguarding Children Policy, Procedure & Process
- Domestic Abuse and Harmful Practices Policy, Procedure & Process
- ABC Respond+ Procedure & Process
- Allocations Policy & Processes
- Hoarding Policy & Processes
- Aid & Adaptations Policy & Process
- Repairs & Maintenance Policy & Processes
- Data Protection Policy & Process
- Tenant Voice Strategy & Processes
- Inclusion Strategy & Processes

This policy will be used to guide service delivery across all other customer policy areas when it is apparent that there is a vulnerability that needs to be considered.

1.6 The scope of this policy covers all service areas at Torus:

Torus (including both Housing and Assets)	✓
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Torus Foundation	✓
Torus Developments	✓
HMS	✓

It applies to anyone living in our:

General needs rented homes	✓
Supported and sheltered housing	✓
Rent to Buy, Leasehold and Shared Ownership homes	✓
Hostels and temporary accommodation	✓

## 2. Policy Statement

- 2.1 This part of the policy explains Torus' approach to vulnerability and reasonable adjustments in more detail. It sets out the principles that all Torus colleagues should follow so that we respond to the needs of vulnerable people when we:
1. design and plan new services
  2. conduct our day-to-day activities
- 2.2 Torus has a duty to help customers access services regardless of any protected characteristics they may have (such as age and disability). As a social landlord, we also know that people can be vulnerable for reasons that are not included in the Equality Act 2010. This policy sets out how we define vulnerability (2.6 to 2.10 below) and how we may adjust the way services are delivered to overcome barriers.
- 2.3 Our main objective is to help vulnerable tenants and residents to access services and support to manage their tenancy. To do this, all those who deliver services will be expected to:
1. Understand how Torus defines vulnerability;
  2. Use knowledge, empathy and professional curiosity to help identify vulnerability at points of contact;
  3. Aim to identify vulnerabilities at the earliest possible stage so that support measures can be put in place quickly;
  4. Record vulnerabilities in the housing management system ('customer alerts') and keep records up to date.
  5. Consider if services require adjustment to meet the needs of vulnerable tenants and residents;
  6. Consider vulnerabilities when making decisions around tenancy management; and
  7. Make referrals to advice and support where needed, either to specialist Torus teams or statutory agencies and other external partners.
- 2.4 When a vulnerability is identified, we will aim to deliver the most appropriate, tailored solution so that vulnerable people are not put in a disadvantaged or dangerous situation. These changes are known as 'reasonable adjustments' (3.8 to 3.12 below).

- 2.5 We are committed to the principles of diversity and inclusion and aim to meet the needs and choices of people from all backgrounds and characteristics.

### **Defining vulnerability**

- 2.6 Everyone will experience moments of vulnerability in their lives, but this does not necessarily make someone vulnerable. For Torus, vulnerability is when:
- A person or a household is experiencing difficulties with everyday living that require additional support to manage their tenancy and/or access Torus services.
- 2.7 A vulnerability can be temporary or constant. For example, someone may become vulnerable for a period of time because of a bereavement, a mental health or domestic violence incident, or high levels of debt. Or they may be living with a long-term or permanent vulnerability (such as a physical or learning disability, or a severe illness).
- 2.8 The ability of a person to cope with everyday activities is the most important factor when considering vulnerability. This can guide the kind of support that is provided to help manage their tenancy.
- 2.9 Some of the most common characteristics, events and factors that influence a tenant or resident's vulnerability are shown in Appendix 1 (pages 12 and 13).
- 2.10 This policy focuses on residents who are vulnerable but have capacity to make their own decisions. If a resident has been assessed as lacking capacity to make decisions, we will work with their appointed legal representatives.

### **Roles and responsibilities**

- 2.11 The Group Housing Director is responsible for making sure this policy is effectively implemented across Torus Group's customer-facing service areas. This includes responding to any future changes to legislation, regulation and best practice.
- 2.12 The Group Housing Director is accountable for making sure the resources are in place (processes, teams and training for Torus colleagues) to implement this policy.
- 2.13 The Housing Services Directors are the leads for the day-to-day delivery of this policy.
- 2.14 The Group Directors for Assets, Torus Developments, Torus Foundation and HMS will support the Group Housing Director and Housing Services Directors to ensure Torus' approach to vulnerability is clear and consistent.
- 2.15 All colleagues who provide customer-facing services to tenants and residents are responsible for familiarising themselves with this policy and associated processes and procedures.
- 2.16 All customer-facing colleagues are responsible for considering tenant and resident vulnerabilities. This includes people working for Torus, Torus Foundation, Torus

Developments and HMS. Colleagues should use the knowledge gained by reading this policy and by completing relevant training and be professionally curious.

- 2.17 Ultimate responsibility for inputting, maintaining and managing customer alerts on the housing management system sits with the Neighbourhoods team in Housing.

### **3. Implementation**

#### **Identifying vulnerability**

- 3.1 A tenant or resident vulnerability may be identified in a number of ways:
1. a resident can inform us when they apply for a home or contact us during their tenancy. This is called 'self-referral' and can include application forms with a vulnerability checklist (for example, a Local Authority Housing Register, Homelessness Prevention Form or Disabled Facilities Grant);
  2. any Torus colleague who has contact with the tenant or resident, whether that is in person, over the phone, or through any other channel of communication;
  3. through a contractor, subcontractor or other external partner, who may see that someone requires additional support or note safeguarding concerns; and
  4. a referral from an external agency or organisation, such as Occupational Therapists, Care Managers or GPs.
- 3.2 Torus may hold information relating to vulnerabilities and protected characteristics. This data is used to understand the numbers of tenants and residents with potential barriers to accessing services and to guide potential changes to services in the future.
- 3.3 We will treat all information we receive in a private and confidential manner. We will only disclose information to specific third parties with the consent of the individual tenant or resident. The only exception to this is when we have a legal obligation to pass information to agencies such as the Police. More information on how we use data is available in our Data Protection Policy.

#### **Recording vulnerability**

- 3.4 Torus colleagues who identify a tenant or resident vulnerability will either (1) record this on our housing management system (currently Aareon QL) as a 'customer alert', or (2) pass on relevant details to the Neighbourhoods team, which is ultimately responsible for the management of customer alerts.

Records will include details of the vulnerability (Vulnerability Alert), specific communication or access needs (Communication Alert), and whether there is anyone with a delegated authority to speak to Torus on the resident's behalf (Authority to Act & Power of Attorney Alert). This could include a family member or a care or support worker.

Customer alerts should be checked before contacting tenants or residents. This can help ensure colleagues have advance knowledge of any additional factors that should be considered when delivering services.



Supporting procedures will be available for each customer alert. These will include details on how to add an alert, how often the alert should be reviewed and how to respond to each alert effectively.

- 3.5 The customer alert should provide details of the vulnerability (or vulnerabilities) and individual needs, as well as any reasonable adjustments that have been put in place.
- 3.6 Customer alerts may include concerns such as safeguarding, potential domestic abuse or anti-social behaviour. In these cases, colleagues should work in line with our relevant policies, procedures and processes, and ensure external agencies are involved immediately if Torus colleagues have a concern relating to safety or wellbeing.
- 3.7 Customer alerts provide guidance, but Torus colleagues should use their knowledge, experience and professional curiosity to support tenants and residents with vulnerabilities.

### **Reasonable Adjustments**

- 3.8 Under the Equality Act 2010, we have a legal duty to make reasonable adjustments. The Act protects anyone who accesses goods, facilities or services from discrimination on the basis of a 'protected characteristic'. The duty to make reasonable adjustments is owed to all disabled persons who want to access services.
- 3.9 A reasonable adjustment is a change to the way Torus normally delivers services to take account of individual needs. This can include a home adaptation, a change in how colleagues provide support, or a different way of communicating.
- 3.10 When deciding whether an adjustment is reasonable or not, we may consider how effective the adjustment would be in tackling any barriers to services, how practical it is to make the adjustment and the availability of resources to make sure we always get the adjustment right.
- 3.11 Reasonable adjustments may be tailored to specific needs and circumstances. This policy does not include a full list of adjustments for that reason, but some examples may include:
  - Adaptations in the home, such as grab bars, handrails and lever taps;
  - Different appointment times than standard hours;
  - Accessibility tools for people who have visual impairments or learning difficulties;
  - Providing information in alternative formats, such as large print; and
  - Using an agreed method of communication when contacting a tenant (such as email, phone or letter).

- 3.12 Tenants and residents can ask for a reasonable adjustment by contacting the Torus Customer Hub (by calling 0800 678 1894 or emailing [info@torus.co.uk](mailto:info@torus.co.uk)) or by speaking to a Torus colleague (such as a Housing Officer or Customer Liaison Officer).

### **Delivering services and supporting customers**

- 3.13 Each service area at Torus will consider what extra support, adjustments or changes to normal service provision are appropriate for vulnerable tenants and residents. This will vary between service areas, but may include things like:

- Allowing longer for tenants and household members to get to the telephone or door
- Arranging for more than one person to visit for appointments;
- Visits in person rather than a phone call;
- Making sure a translator is present when vulnerable tenants need them; and
- Arranging for aids and adaptations in the home, in line with our Aids & Adaptations Policy.

3.14 Managers and their teams should refer to this Vulnerability and Reasonable Adjustments Policy every time they design a service for tenants and residents to include vulnerability and reasonable adjustments. Some of the main service areas are shown below:

Allocations and lettings:

- We will consider information about an applicant's vulnerability when allocating homes to make sure our offer is right for the person and their family.
- New tenants will have the opportunity during the tenancy sign up to tell us about a vulnerability affecting them or someone in the household. We may make reasonable adjustments at that point or refer the new tenant to an external support agency for advice and support.

Aids and adaptations:

- All tenants can apply for an adaptation to their home. We will assess requests individually, based on the needs of the tenant and household members, as well as if the home can be adapted and the cost of the adaptation.
- The Aids and Adaptations Policy explains the process in further detail.

Communications:

- We may ask tenants about their communications needs during the tenancy sign up and regular intervals after that. This is because tenant needs can change over time.
- We would normally expect tenants and residents to plan so they can communicate effectively with Torus, but we will aim to offer support to someone with an identified vulnerability.
- Adjustments may include large print and audio, a British Sign Language interpreter, letters sent out on different coloured paper or alternative formats such as Easy Read. We will also aim to speak to, call or write to people who are not able to communicate online (via the website or by email).

Home repairs:

- Vulnerable people may find it more difficult to ask for and cope with repair appointments if something goes wrong in their home.
- When a tenant contacts Torus to request a repair, we will consult the 'customer alerts' to confirm if there are any vulnerabilities or support needs.
- We will aim to take vulnerability into account and make adjustments so that we complete a tenant's home repair in a way that meets the needs of the household.

Arrears:

- All tenants need to pay their rent on time and let us know if they are struggling to keep their rent balance up to date.

- People who have vulnerabilities may well have difficulties with managing their money and we will aim to support tenants who do fall into rent arrears. This will include money advice services and agreeing realistic plans to catch up on rent payments.
- We will need to take enforcement action against tenancy breaches, but we will aim to offer support and strive to agree adjustments first. Enforcement action is always the last resort.

Anti-social behaviour, domestic abuse and safeguarding:

- We aim to tackle anti-social behaviour and promote safer neighbourhoods in partnership with external agencies such as the police and local council. Anti-social behaviour can interfere with the comfort and wellbeing of other people and groups living nearby, which is why our Anti-social Behaviour Policy focuses on delivering effective prevention, support and enforcement activities.
- People may act in an anti-social way due to behaviours relating to a vulnerability. This is why we will consider both the wellbeing of the vulnerable person and the broader safety and wellbeing of neighbouring residents.
- Our aim is to support people who are victimised or taken advantage of, including cases of domestic abuse, hate crime and harassment.

Tenant support:

- All support provided by Torus teams to tenants and residents begins by understanding the individual and their individual needs. It is important for all colleagues providing support in this way to identify and respond to potential vulnerability.
- We will aim to support vulnerable tenants and residents directly or signpost the tenant or resident to the right external agencies for specialist help.

## **4. Consultation**

- 4.1 This policy has been designed in partnership with tenants and residents. In the first drafting stages, tenants on the Diversity and Inclusion Panel were asked to contribute to the Equality Impact Assessment (EIA). That EIA forms the basis for this policy.
- 4.2 The Policy Consultation Panel has reviewed the full draft of this policy. This includes every tenant and resident who has said they want to be involved in consultations and members of our Facebook group 'Torus Talk'.
- 4.3 The Landlord Operations Committee (LOC) at Torus, which comprises tenants, Torus leadership and external partners, has reviewed [and approved] this policy.
- 4.4 Service areas that have contributed to this policy include Housing, Assets, Torus Foundation, Torus Developments and HMS.

## **5. Inclusion**

- 5.1 Torus is committed to cultivating an inclusive environment where every individual is valued, respected, and empowered. We embrace diversity and recognise that inclusion drives creativity, innovation, and business excellence.

- 5.2 Discrimination, harassment, and bias have no place in our company. We strive to promote a culture of respect, understanding, and equal opportunity for all.
- 5.3 Under the Equality Act 2010, Torus are considered as exercising a public function in the provision of its services. Torus will be compliant with all aspects of Equality, Diversity and Inclusion legislation.
- 5.4 Torus' approach will aim to embed inclusion in service delivery, policies and procedures and will comply with legislation.
- 5.5 An Inclusive Torus has fair policies and practices in place and enables a diverse range of people to come together effectively.
- 5.6 The protected characteristics (age, disability, gender re-assignment, marriage & civil partnership, race, religion or belief, sex and sexual orientation) do not necessarily define all people with a protected characteristic as 'vulnerable'. For the purposes of this policy, we will give due consideration to any protected characteristics in deciding any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination.

## **6. Monitoring and Review**

- 6.1 This policy replaces the 12-month interim Vulnerability and Reasonable Adjustments Policy that was approved in September 2023.
- 6.2 We will monitor the impact and performance of this policy every six months. Monitoring will focus on how the customer alerts are performing, backed by regular review processes. Compliance with this policy will be monitored by periodic reviews of case records by the relevant team manager.
- 6.3 This policy will be reviewed every three years by the Housing Services Director, or in line with changing business need.

**Appendix A – Common vulnerability factors**

This section lists the groups of people who are more likely to be vulnerable.

The categories listed below do not show every possible factor to think about when considering if a tenant or resident is vulnerable. The number of factors that could make a person vulnerable is too large to be useful within the scope of this policy. Professional curiosity should be used if a Torus colleague thinks a person may well be vulnerable.

Vulnerability is when a person or a household is experiencing difficulties with everyday living that require additional support to manage their tenancy and/or access Torus services.

The list below shows three different categories of potential vulnerability:

1. Underlying characteristics
2. Ability to manage and engage
3. Exceptional life events

<b>Underlying characteristics</b>
People in this category of vulnerability are more likely to be vulnerable, but they may not need additional support or any reasonable adjustments.
Older people (particularly people 75 years or older)
People with a physical or sensory disability
Care leavers
Single parents under 21 years old
Refugees and asylum seekers
Carers
Families with disabled children
Ex armed forces personnel
Ex offenders
People living with a life-limiting illness or condition
<b>Ability to manage and engage</b>
People in this category may find it harder to access Torus services, so reasonable adjustments may be required.
People with a learning disability
People with limited mobility or frailty
Mental illness
Autism Spectrum Disorder (such as Asberger’s Syndrome)
People living with chronic and debilitating health conditions
Addiction and/or serious substance or alcohol abuse
Low levels of literacy
Low or no English language skills, and no support from family
Digital exclusion (unable to interact with Torus online or via email)

<b>Exceptional life events</b>
People in this category may not have any constant vulnerabilities, but they may have a temporary vulnerability as a result of trauma. They may find it difficult to cope on a daily basis, so reasonable adjustments may be required.
Severe illness
Victims of domestic abuse
Victims of anti-social behaviour or neighbour harassment or abuse
Victim of sexual or racist abuse or any other hate crime
Pregnant women
People who become unemployed
People with recent experience of homelessness or repeated homelessness
Bereavement following the death of a partner, child or other close relationship
Moving from supported housing to independent living
Families with children excluded from school
Divorce or relationship breakdown
Serious rent arrears or other debt problems and unable to meet basic needs (for example, fuel or food poverty)
Recently released from prison

## **Appendix B**

EQUALITY IMPACT ASSESSMENT IS SAVED INTERNALLY ON THE GROUP SHAREPOINT. AVAILIBLE UPON REQUEST EXTERNALLY.