

Vulnerability and Reasonable Adjustments Policy

September 2023 CUS-POL-15-01

0.	DOCUMENT CONTROL
0.1	SUMMARY
	The subject of this document is the Vulnerability and Reasonable Adjustments
	Policy

0.2 DOCUMENT INFORMATION

Role	Name/Position	Date
Regional Director	Gaynor Johnson	8/9/2023
Document Reference	CUS-POL-15-01	

0.3 DOCUMENT STATUS HISTORY

Version	Date	Section	Reason for Update	
1	08/09/2023		New Policy	
0.4 DOCUMENT REVIEW DATE				
Review Date September 2024				
Responsible Officer	Gaynor John	iynor Johnson		
0.5 DISTRIBUTION				
Name	Title	Title		

Contents

1. Introduction	3
2. Objectives and scope	3
3. Defining vulnerability	. 4
4. Identifying vulnerability	5
5. Acting on vulnerability	5
6. Vulnerability and reasonable adjustments	6
7. About this policy	6
8. Supporting policies, procedures, and processes	. 7

Vulnerability and Reasonable Adjustments Policy

1. Introduction

Torus recognises that some customers and residents may be vulnerable for a number of reasons. We believe in the principle of accessibility for all and are committed to supporting customers who are experiencing vulnerabilities, both to access Torus services and to get the support they need to sustain their tenancies.

Torus provides a range of additional support for vulnerable people and those facing exceptional circumstances. We understand that, to do this properly, we need to be consistent in our approach and to make sure that every Torus colleague who works with vulnerable residents has the information and tools to provide appropriate support.

2. Objectives and scope

Being vulnerable does not reduce a tenant's responsibility to fulfil the conditions of their Tenancy Agreement. However, we recognise that some tenants will require additional support in meeting their obligations.

This policy provides guidance in relation to vulnerability and explains the approach we will take when providing accommodation and services to vulnerable customers and residents.

Throughout this policy, the term 'customers and residents' refers to Torus tenants (sole/joint), leaseholders/shared owners, and household members.

The objectives of this policy are to:

- Provide a high-quality service that always considers vulnerability when making decisions.
- Ensure Torus homes and housing management services both recognise the potential effects of vulnerability and provide a responsive service that takes vulnerability into account, limiting instances of tenancy failure.
- Assist vulnerable customers and residents in accessing additional services that they may need in an approachable, responsive, and consistent way, and to report issues.
- Identify potentially vulnerable people at an early stage to enable preventative action and targeted support.
- Ensure vulnerabilities are recorded in an effective and appropriate way and keep this up to date.
- Make safeguarding referrals whenever needed.

- Provide consistent and clear information to enable customers and residents to understand Torus policies and procedures, and who to contact to answer queries; and
- Support the development of sustainable communities by delivering tailored support services to vulnerable customers, either directly or via a suitably recognised third party organisation.

This policy focuses on residents who are vulnerable but have capacity to make their own decisions. If a resident has been assessed as lacking, or is believed to lack, capacity to make decisions, we will work with their appointed legal representatives.

3. Defining vulnerability

For Torus, a vulnerable customer is:

Someone who is experiencing difficulties with everyday living, making them unable to remain independent, unable to manage their tenancy without additional support and/or potentially disadvantaged when accessing Torus services.

It is not possible to list every situation or circumstance where a customer could be vulnerable, nor whether the vulnerability is temporary or permanent. However, the table (shown below) provides an overview of important vulnerability drivers, with examples of potential vulnerability indicators shown under each one:

Table: the four drivers of vulnerability

Health	Life events	Resilience	Capability
Physical disability	Bereavement	High levels of debt	Unable to manage finances
Severe or long-term illness	Domestic abuse (including economic control)	Inadequate or erratic income	Low levels of literacy or numeracy skills
Hearing or visual impairment	Experience of anti- social behaviour or neighbour harassment	Food poverty	Language barriers
Mental health condition or disability	Relationship breakdown		Poor or non-existent digital skills
Addiction or substance misuse	Caring responsibilities		Learning difficulties
	Change in circumstances (for example, leaving		No or low access to help and support

Health	Life events	Resilience	Capability
	care, seeking asylum or protection from human trafficking or modern slavery)		

This definition recognises that vulnerability can be a changeable state and may be influenced by multiple factors and experiences, for example, age, disability, bereavement, mental health, domestic violence, and poor financial health.

It is the interaction of these factors that determines how vulnerable a person is at any point in time and how much additional support they may require to sustain their tenancy.

4. Identifying vulnerability

Vulnerability can be identified in a number of ways:

- Application forms that include a vulnerability checklist for example, a Local Authority Housing Register, Homelessness Prevention Form, Disabled Facilities Grant, and private sector leasing scheme.
- During the initial tenancy sign-up or during other home visits for example, noting instances of anti-social behavior, harassment, or domestic violence, hoarding self-neglect or mental health issues.
- Over the phone.
- Notification from relatives, neighbours or friends.
- During daily calls or weekly visits for tenants.
- If a contractor has concerns that someone may require some extra support or there are safeguarding concerns; and
- Notifications from professionals, such as Occupational Therapists, Care Managers or GPs.

5. Acting on vulnerability

When a customer or resident is identified as vulnerable, we will:

- Record the nature of the vulnerability securely on our housing management system, together with 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.
- Check the system to note any vulnerabilities when any future contact with the customer or resident is made, to ensure we always act in an appropriate way in response to the type of vulnerability.

- Respect privacy at all times and follow our procedures to ensure that appropriate safeguarding is in place.
- Liaise with relevant advice and support agencies that may also be working with the customer or resident to resolve any housing issues, including making any necessary safeguarding referrals.
- Carry out vulnerability assessments if someone other than a member of staff has identified a vulnerability. This may be phone conversation or visit by the Housing Team and will identify support requirements and, if appropriate, refer the customer or resident to relevant external organisations; and
- Undertake regular reviews to make sure the information we have is up to date and accurate.

6. Vulnerability and reasonable adjustments

When we identify a customer or resident with vulnerabilities, and where reasonable adjustments are required, the support we offer can include:

- Providing information in other formats in agreement with the customer to ensure we always use the most appropriate means of communication for example, translations, interpreters, or signers, as well as audio recordings, Braille, and large-print documents.
- Allowing more time for the customer to get to the telephone or door.
- Considering vulnerability in our repairs offer and prioritising residents with health or vulnerability issues.
- Working with customers to put direct debits in place for housing benefit/Universal Credit payments, which would be paid directly to Torus.
- Considering the needs of household members in the event of a tenant's death, including potential to grant discretionary succession where there are vulnerability issues;
- Actively working with Local Authorities to support the provision of aids and adaptations in the home through existing funding arrangements.
- Supporting customers and residents to prevent or reduce debt, manage their money, and maximise incomes through referrals to our charitable arm, Torus Foundation.

7. About this policy

This is a 12-month interim Vulnerability and Reasonable Adjustments Policy. Development of a full, three-year policy will commence in early 2024, beginning with a comprehensive Equality Impact Assessment.

It is expected that the full policy will replace this version in September 2024 and that a Torus Inclusion Policy will sit alongside Vulnerability and Reasonable Adjustments at that point.

8. Supporting policies, procedures, and processes

This policy should be read in conjunction with the following documents:

- Adaptations Policy
- ASB Respond+ Procedure
- Data Protection Policy
- Domestic Abuse and Harmful Practices Policy
- Safeguarding Strategy
- Safeguarding Adults Policy
- Safeguarding Children Policy

Additionally, the following policies are in development and should be referred to once launched:

- Allocation Policy
- Customer Alerts Policy